

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

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

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

Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 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% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

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

Answer: Yes

b. Cluster GS-11 to SES (PWD)

Answer: Yes

Based on the utilization analysis of the DHS workforce by disability grouping, PWDs are participating at a rate of 8.79 percent in the GS-1 to GS-10 grades, and a rate of 10.24 percent in the GS-11 to SES grade clusters. Both rates are lower than expected, when compared to the 12 percent regulatory onboard goal.

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

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

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

Answer: Yes

b. Cluster GS-11 to SES (PWTD)

Answer: Yes

Based on the utilization analysis of the DHS workforce by disability grouping, PWTDs (IWTD) are participating at a rate of 1.43 percent in the GS-1 to GS-10 grades, and at a rate of 1.18 percent in the GS-11 to SES grade clusters, which is lower than expected, when compared to the 2 percent onboard regulatory goal.

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

Annual hiring goals for individuals with disabilities and targeted disabilities are formally announced in conjunction with the Veterans hiring goals on an annual basis from the DHS OCHCO to all DHS Components via the Human Capital Leadership Council (HCLC), which is composed of the senior human capital officials in OCHCO, the DHS Components, and other lines of business. The goals are further communicated to the

Components' EEO and Diversity officials and staff, to be socialized and implemented throughout the Components with human resources, EEO, and Diversity practitioners and hiring officials.

Section II: Model Disability Program

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

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

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

Answer: Yes

CRCL's, Equal Employment Opportunity and Diversity Division, has a full-time Departmental Disability Employment Program Manager who is responsible for implementing and maturing the DHS Disability Employment Program. Also at the DHS level, (OCHCO's SRDI) has two assigned employees to support disability recruitment, career development, and retention programs across DHS. All DHS Components have identified personnel for the following programs: Selective Placement Program, Disability Employment Program, Reasonable Accommodation Program, and the Operations Warfighter Program.

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	123	9	28	See full report for list of responsible officials.
Answering questions from the public about hiring authorities that take disability into account	132	9	29	See full report for list of responsible officials.
Processing reasonable accommodation requests from applicants and employees	18	0	25	See full report for list of responsible officials.
Section 508 Compliance	62	0	0	See full report for list of responsible officials.
Architectural Barriers Act Compliance	110	0	0	See full report for list of responsible officials.
Special Emphasis Program for PWD and PWTD	8	0	0	See full report for list of responsible officials.

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

Answer: Yes

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

- Leading Quarterly Disability Employment Advisory Council meetings covering ongoing program guidance, updates, and sharing of best practices across DHS Components.
 - Participation in the Federal Exchange on Employment & Disability (FEED), 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.
- Developed and delivered DHS Selective Placement Program Coordinator training to all identified Selective Placement Program Coordinators and Disability Program Managers.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer: Yes

Eight of the nine DHS Components responded Yes.

Additionally, in support of meeting this measure, CRCL continued efforts during FY 2017, to encourage all DHS Components to utilize the Accessibility Compliance Management System (ACMS) to manage and track reasonable accommodations. As of January 2018, six out of nine Components are successfully using ACMS.

Section III: Program Deficiencies in the Disability Program

In Part G of its FY 2017 MD-715 report, the agency identified the following program deficiencies involving its disability program:

Program Deficiencies	Agency Comments
Have the procedures for reasonable accommodation for individuals with disabilities been made readily available/accessible to all employees by disseminating such procedures during orientation of new employees and by making such procedures available on the World Wide Web or Internet?	HQ has not met this measure.
Are 90% of accommodation requests processed within the frame set forth in the agency procedures for reasonable accommodation?	CBP and ICE have not met this measure.

Program Deficiencies	Agency Comments
Does the agency review disability accommodation decisions/actions to ensure compliance with its written procedures and analyze the information tracked for trends, problems, etc.?	FEMA and HQ have not met this measure.

Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

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

DHS implemented a CRC, comprising recruiting personnel from DHS Components and led by OCHCO, Strategic Recruitment, Diversity and Inclusion to identify and monitor disability recruiting programs and resources. The Recruitment Outreach Marketing Matrix (ROMM) is used to monitor all DHS activities. The CRC also assists with the implementation of the Strategic Outreach and Recruitment Plan (SOAR). In FY 2017, the CRC continued to maintain a Top 25 list of recruiting events to attend. From this list, OCHCO identified a priority subset for DHS-wide coordination, focusing on DHS mission-critical occupations (predominantly law enforcement). In FY 2017, DHS participated in 91 events targeting veterans with disabilities and 14 events targeting individuals with disabilities (IWD) and targeted disabilities (IWTD). Events targeting IWD and IWTD included:

- Illinois Vocational Rehabilitation, Chicago, IL
- Minnesota Vocational Rehabilitation Agency, Saint Paul, MN
- Rotary Career Fair, Bellingham, WA
- Snohomish Career Fair, Marysville, WA
- Non-Competitive Hiring Fair, St. Paul, MN
- Advancement Via Individual Determination Classes, San Antonio, TX
- Gallaudet University Spring Career Fair, Washington, DC (multiple Component attendance)
- Employment Opportunity Information Sessions at Gallaudet, Washington, DC
- International Technology & Persons with Disabilities Conference, San Diego, CA
- Bender Disability Virtual Career Fair, Virtual
- Schedule A Targeted Hiring Event, Lyndhurst, NJ

Additionally, DHS conducted the following activities:

- Provided two information sessions for three classes in February 2017 and September 2017 at Gallaudet University to discuss objectives with college students including the Workforce Recruitment Program (WRP), the Pathways program, how to apply non-competitive jobs via USAJOBS, how to obtain a Schedule A letter from medical professionals or rehabilitation offices, and professionalism.

- In support of the DOL's Workforce Recruitment Program, conducted approximately 40 telephone interviews with students from the National Technology Institute of the Deaf, Touro Law School, and the University of San Francisco. As WRP recruiters, candidate profiles were developed, as well as recommendations for further referral for the WRP 2018 database.

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:

- 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))

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 both the Schedule A appointing authority, and the 30 percent or More Disabled Veteran authority. Component Selective Placement Program Coordinators and Veterans Employment Program Managers handle coordination of applicants who qualify under non-competitive authorities.

The Department recognizes that while it has an established policy on administering the employment of veterans, it does not currently have a policy covering the Schedule A Appointment Authority for Individuals with Disabilities. DHS will continue to explore the feasibility of developing a DHS Schedule A policy during FY 2018.

For detailed procedures on how DHS Components are handling and processing applicants eligible under both Schedule A and the 30 percent or More Disabled Veteran authority, please refer to each Component's MD-715 report.

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

Answer: Yes

DHS developed training for all hiring managers and human resources professionals entitled, "Employment of People with Disabilities: A Roadmap to Success," which includes information on Schedule A hiring authority as well as Veterans hiring authorities that take disability into account. The training is mandatory and must be taken sixty (60) days from employment and every two years thereafter.

The Roadmap to Success training was updated during FY 2017 to include the provision of the Final Rule covering Section 501 of the Rehabilitation Act, as well as other necessary revisions. DHS plans to revise this training course over the next two years.

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.

The CRC coordinated participation in recruiting events at Gallaudet University, California State Northridge, the National Technical Institute for the Deaf, the Bender Virtual Career Fair, and recruiting and outreach events for disabled veterans through Operation Warfighter and Wounded Warrior programs. A pilot non-paid internship program was also initiated during the summer in FY 2017, with CRCL and the Maryland Department of Rehabilitation Services, resulting in three offers of full-time employment. DHS plans to expand and encourage Component participation to increase employment opportunities throughout DHS.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

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

b. New Hires for Permanent Workforce (PWTD) Answer: Yes

During FY 2017, DHS exceeded the 12 percent hiring goal for IWD, representing 12.04 percent of all new hires. DHS did not reach the 2 percent hiring goal for IWTD. IWTD represented 1.14 percent of all new hires, which falls below the 2 percent hiring goal.

Disability workforce data includes employees who self-identify as having a disability and employees appointed under Schedule A and 30 percent or more Disabled

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) Answer: No

b. New Hires for MCO (PWTD) Answer: Yes

Based on a review of B7 Applications and Hires which represents AFD and hires for Components (CBP, HQ, ICE, USCIS, and FEMA) that are using USA Staffing Cognos, triggers exist for the following occupations of the 10 Major Occupational Classifications for IWTDs:

1802-Compliance Inspection and Support: Qualified 1.54 percent; Selections 0.69 percent

1895-Customs and Border Protection: Qualified 0.51 percent; Selections 0.00 percent

1896-Border Patrol Agent: Qualified 0.73 percent; Selections 0.00 percent

0343-Management and Program Analysis: Qualified 2.35 percent; Selections 1.98 percent

2210-Information Technology Management: Qualified 1.16 percent; Selections 0.90 percent

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) Answer: No

b. Qualified Applicants for MCO (PWTD) Answer: No

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, and the applicant may qualify based on experience obtained prior to entry into their current job series, or into DHS. DHS has not attempted to develop an estimate for job series-relevant applicant pools to date. In FY 2018, DHS will work to determine whether there is a way to develop the relevant internal applicant pool percentages for each series.

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) Answer: Yes

b. Promotions for MCO (PWTD) Answer: Yes

Based on a review of B9 Selections for Internal Competitive Promotions for Major Occupations, which represents AFD and selections for Components (CBP, HQ, ICE, USCIS, and FEMA) that are using USA Staffing Cognos, triggers exist for the following occupations for IWD and IWTDs when comparing the qualified applicant pool to the number of selections for promotions:

IWD

1896-Border Patrol Agent: Qualified 2.98 percent; Selections 2.30 percent

IWTD

1801-General Inspection, Investigation, & Compliance: Qualified 3.56 percent; Selections 1.95 percent

1895-Customs and Border Protection: Qualified 1.69 percent; Selections 0.06 percent

1896-Border Patrol Agent: Qualified 1.53 percent; Selections 0.31 percent

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

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

A. ADVANCEMENT PROGRAM PLAN

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

All managers and supervisors are encouraged to promote the career development of all employees, including individuals with disabilities and individuals with targeted disabilities.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

DHS hosted the Third Annual DHS Education Fair on September 21, 2017 in Washington, D.C., which included over 30 colleges and universities offering information on degrees and certifications available to DHS employees and family members. 225 employees and family members attended in person, and 100 employees participated by webinar. DHS Components continue to promote participation in their training and career development and academic programs through their internal Component websites and employee communications channels. Additionally, DHS employees have access to training/career development courses such as DHS's Senior Executive Service Candidate Development Program. DHS, in partnership with SkillSoft, offers approximately 20,000 online learning resources. Employees can use these online resources as quick references, practical job aids to gain in-depth knowledge, or skill practice. These resources are mapped to support competencies, job roles, or blended learning offerings.

The DHS Mentoring Program is a formal program that provides enriching experiences through reciprocal relationships and opportunities for personal and professional growth while sharing knowledge, leveraging skills, and cultivating talent. The DHS Mentoring Program is open to all DHS federal employees. The Undersecretary for Management announces mentoring opportunities and provides training to mentors. Types of mentoring include: Speed Mentoring, Flash Mentoring, Situational Mentoring, Reverse Mentoring, Group Mentoring, and Peer Mentoring. The program is evaluated, and feedback is provided on its successes, along with areas requiring improvement. The OCHCO Strategic Learning Development and Engagement Division is exercising option year four (2017-2018) of the Mentoring Connection contract. In FY 2017, the DHS Mentoring programs coordinated over ninety (90) mentoring/mentee partnerships.

2. 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 applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

a. Applicants (PWD)

Answer: No

b. Selections (PWD)

Answer: No

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 2017, AFD data were not available to conduct an analysis of the applicants and selections for development programs identified above by the required benchmarks. However, when comparing the number of selections for PWD to the 12 percent goal, PWD (IWD) were selected at rates significantly below those expected in the reported mentoring programs and the SES CDP program.

3. Do triggers exist for PWTD 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)

Answer: No

b. Selections (PWTD)

Answer: No

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 2017, AFD data were not available to conduct an analysis of the applicants and selections for development programs identified above by the required benchmarks. When comparing the number of selections for PWTDs (IWTD) to the 2 percent goal, PWTDs (IWTD) are exceeding in all programs with the exception of the Pathways-Recent Graduates program.

C. AWARDS

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

a. Awards, Bonuses, & Incentives (PWD)

Answer: Yes

b. Awards, Bonuses, & Incentives (PWTD)

Answer: Yes

Based on a review of MD-715 Table B13: Employee Recognition and Awards - Distribution by Disability, PWD (IWD) and PWTD (IWTD) are not receiving awards at the expected rates when compared to the corresponding inclusion rate. DHS-wide, this was identified for the following categories:

IWD		Benchmark
1-9 hours:	IWD Inclusion Rate: 26.87%	IWOD Inclusion Rate:
34.52%		
Cash awards 1 – \$500:	IWD Inclusion Rate: 21.65%	IWOD Inclusion Rate:
26.63%		
Cash awards \$500 +:	IWD Inclusion Rate: 50.41%	IWOD Inclusion Rate:
59.85%		
IWTD		Benchmark
1-9 hours:	Inclusion Rate: 34.03%	IWOD Inclusion Rate:
34.52%		
9+ hours:	Inclusion Rate: 25.40%	IWOD Inclusion Rate:
26.49%		
Cash awards \$500 +:	Inclusion Rate: 47.37%	IWOD Inclusion Rate:
59.85%		

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

a. Pay Increases (PWD)

Answer: No

b. Pay Increases (PWTD)

Answer: No

Based on a review of MD-715 Table B13: Employee Recognition and Awards - Distribution by Disability, PWDs (IWD) and PWTD (IWTD) are exceeding the inclusion rate benchmark for quality step increase (QSIs).

QSI Awards	IWD Inclusion Rate:	1.16%
	IWTD Inclusion Rate:	1.53%
Benchmark	IWOD Inclusion Rate:	0.74%

Further review indicates 4 out of 9 Components have triggers in this award category.

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

a. Other Types of Recognition (PWD) Answer: N/A

b. Other Types of Recognition (PWTD) Answer: N/A

DHS did not have any other types of recognition programs during FY 17.

D. PROMOTIONS

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

a. SES

i. Qualified Internal Applicants (PWD) Answer: No

ii. Internal Selections (PWD) Answer: No

b. Grade GS-15

i. Qualified Internal Applicants (PWD) Answer: Yes

ii. Internal Selections (PWD) Answer: No

c. Grade GS-14

i. Qualified Internal Applicants (PWD) Answer: Yes

ii. Internal Selections (PWD) Answer: No

d. Grade GS-13

i. Qualified Internal Applicants (PWD) Answer: Yes

ii. Internal Selections (PWD) Answer: No

Based on a review of MD-715 Table B11: Internal Selections for Senior Level Positions (GS 13, 14, 15, and SES) - Distribution by Disability, PWD (IWD) participation rates within the Qualified Internal Applicants indicate triggers for Grades GS-13 through GS-15. However, data shows rates for these selections exceeded their corresponding qualified applicant percentages, indicating no trigger for internal selections.

DHS SES positions were all announced and open to the public during FY 2017. DHS is unable to determine the percentage of qualified internal applicants by disability

distribution, due to limited applicant flow data available. However, when comparing the percentage of SES selections to the relevant applicant pool as an alternative comparator, selections for PWD (IWD) were lower than expected.

IWD SES Selections: 3.57% IWD Relevant Applicant Pool: 12.00%

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

a. SES

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

b. Grade GS-15

i. Qualified Internal Applicants (PWTD) Answer: Yes

ii. Internal Selections (PWTD) Answer: No

c. Grade GS-14

i. Qualified Internal Applicants (PWTD) Answer: Yes

ii. Internal Selections (PWTD) Answer: No

d. Grade GS-13

i. Qualified Internal Applicants (PWTD) Answer: Yes

ii. Internal Selections (PWTD) Answer: No

Based on a review of MD-715 Table B11: Internal Selections for Senior Level Positions (GS 13, 14, 15, and SES) - Distribution by Disability, PWTD (IWTD) participation rates within the Qualified Internal Applicants indicate triggers for Grades GS-13 through GS-15. However, as with IWD, data reveal rates for these selections exceeded their corresponding qualified applicant percentages, indicating no trigger for internal selections.

DHS SES positions were all announced and open to the public during FY 2017. DHS is unable to determine, due to limited applicant flow data available, the percentage of qualified internal applicants by disability distribution. However, when comparing the percentage of SES selections to the relevant applicant pool as an alternative comparator, selections for PWTD (IWTD) were lower than expected.

IWTD SES Selections: 0.00% IWTD Relevant Applicant Pool: 1.00%

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

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

DHS was unable to analyze new hires for PWD (IWD), as compared to the required benchmark using applicant flow data.

However, based on a review of MD-715 Table B8: New Hires by Type of Appointment, filtered down by hires for Senior Level Positions (GS 13, 14, 15, and SES) - Distribution by Disability, PWD (IWD) exceeded the 12 percent goal for all grades with the exception of SES new hires.

	Hires	Qualified Applicant Pool	
Regulatory Goal			
New Hires to SES	9.52%	Not Available	12%
New Hires to GS-15	20.73%	Not Available	12%
New Hires to GS-14	20.41%	Not Available	12%
New Hires to GS-13	21.00%	Not Available	12%

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) | Answer: No |
| b. New Hires to GS-15 (PWTD) | Answer: No |
| c. New Hires to GS-14 (PWTD) | Answer: Yes |
| d. New Hires to GS-13 (PWTD) | Answer: Yes |

DHS was unable to analyze new hires for PWTD (IWTD), as compared to the required benchmark using applicant flow data.

However, based on a review of MD-715 Table B8: New Hires by Type of Appointment, filtered down by hires for Senior Level Positions (GS 13, 14, 15, and SES) - Distribution by Disability, PWTD (IWTD) exceeded the 2 percent goal for grades GS 15 and SES. While the percentages of new hires for GS-13 and GS-14 were notable, DHS did not meet the 2 percent goal.

	Hires	Qualified Applicant Pool	
Regulatory Goal			
New Hires to SES	4.76%	Not Available	2%
New Hires to GS-15	2.59%	Not Available	2%
New Hires to GS-14	1.54%	Not Available	2%
New Hires to GS-13	1.98%	Not Available	2%

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 (PWD) | Answer: No |
| ii. Internal Selections (PWD) | Answer: Yes |

b. Managers

- | | |
|--|-------------|
| i. Qualified Internal Applicants (PWD) | Answer: No |
| ii. Internal Selections (PWD) | Answer: Yes |

c. Supervisors

- | | |
|--|------------|
| i. Qualified Internal Applicants (PWD) | Answer: No |
| ii. Internal Selections (PWD) | Answer: No |

Due to the limited availability of applicant flow data, DHS is unable to identify the participation rates by disability distribution for qualified internal applicants. When reviewing the internal selections, and using the relevant applicant pool as an alternative comparator, triggers were identified for promotions to Executive (GS 15 and above) and Manager (Mid-Level Grades 13-14) positions. No trigger was identified for Supervisors (First-Level Grades 12 and Below) positions.

PWD (IWD) Executive Selections: 2.58%
Pool: 9.00%

PWD (IWD) Relevant Applicant

PWD (IWD) Manager Selections: 7.58%
Pool: 10.00%

PWD (IWD) Relevant Applicant

6. Does your agency have a trigger involving PWTD 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 (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

b. Managers

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

c. Supervisors

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

Due to the limited availability of applicant flow data, DHS is unable to identify the participation rates by disability distribution for qualified internal applicants. When reviewing the internal selections and using the relevant applicant pool as an alternative comparator, no triggers were identified for promotions to supervisory positions.

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

a. New Hires for Executives (PWD) Answer: No

b. New Hires for Managers (PWD) Answer: No

c. New Hires for Supervisors (PWD) Answer: No

Due to the limited availability of applicant flow data, DHS is unable to identify the participation rates by disability distribution for qualified applicants. When reviewing the new hires and using the relevant applicant pool as an alternative comparator, no triggers were identified for hires to supervisory positions for PWD (IWD).

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

a. New Hires for Executives (PWTD) Answer: No

b. New Hires for Managers (PWTD) Answer: No

c. New Hires for Supervisors (PWTD) Answer: No

Due to the limited availability of applicant flow data, DHS is unable to identify the participation rates by disability distribution for qualified applicants. When reviewing

the new hires and using the relevant applicant pool as an alternative comparator, no triggers were identified for hires to supervisory positions for PWTD (IWTD).

Section VI: 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.

Answer: No

During FY 2017, DHS converted a total of 101 of 189 eligible Schedule A employees (Permanent and Temporary) to the Competitive Service, representing 53 percent conversion rate.
DHS will continue to educate supervisors and monitor progress.
Based on DHS Component-level reporting, three out of nine Components indicated no trigger.

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

a. Voluntary Separations (PWD)

Answer: Yes

b. Involuntary Separations (PWD)

Answer: No

Based on a review of MD-715 Table B14: Separations by Type of Separation - Distribution by Disability, IWD are exceeding the inclusion rate benchmark for voluntary separations.

Voluntary Separations	PWD (IWD) Inclusion Rate:	6.75%
Benchmark	PWOD (IWOD) Inclusion Rate:	5.71%

Further review indicates four out of nine DHS Components have triggers in both voluntary and involuntary separations.

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

a. Voluntary Separations (PWTD)

Answer: Yes

b. Involuntary Separations (PWTD)

Answer: Yes

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

Voluntary Separations	PWTD (IWTD) Inclusion Rate:	8.16%
Benchmark	PWTD (IWOD) Inclusion Rate:	5.71%

Involuntary Separations PWTD (IWTD) Inclusion Rate: 0.93%
 Benchmark PWOD (IWOD) Inclusion Rate: 0.73%
 Further review indicates four out of nine DHS Components have triggers in voluntary separations, and two out of nine indicate triggers for involuntary separations.

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

Based on a limited analysis of the DHS exit survey data, which includes all Components with the exception of TSA and USSS, approximately 12 percent of all employees separating completed the exit survey during the first and second quarters of FY 2017 resulting in a total of 3611 response. Of those responses, only 398 or 11 percent of the respondents, indicated they had a disability.

Of the respondents who indicated they had a disability, the top three reasons for leaving other than retirement included:

Supervision/Management – 11.3%

Personal/Family Related – 9.6%

Advancement Opportunities – 9.3%

The top reasons mentioned above are the same as PWOD (IWOD), with the exception of moving to another DHS Component/Office at 10.1%.

When comparing the response rates for leaving based on health-related reasons, PWD (IWD) had an 8% response rate compared to a 1.1% response rate for IWODs. Further review revealed a 3% response rate for employees indicating they had a targeted disability.

Of the respondents who indicated they had a targeted disability, the top three reasons for leaving included:

Supervision/Management – 13.8%

Salary/Pay – 11.0%

Personal/Family Related and Work Environment – tied at 9.2%

Advancement opportunities and health related reasons are next at 8.3%.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

DHS Accessibility Website address: <https://www.dhs.gov/accessibility>

The DHS web page for accessibility does not currently include a description of how to file a Section 508 complaint. However, the page does provide an option for the user to submit an automated comment to describe the user's accessibility issue and offers the user an option to provide recommendations to improve accessibility.

DHS CRCL will collaborate with the Office of Accessible Systems and Technology to update the page to include a notice of rights under Section 508, including a

description of how to file a complaint during FY 2018. Currently, Section 508 complaints from the public are processed under Section 504, and complaints from employees can be processed using the EEO Complaint Process or procedures under Section 504. Links to both procedures are provided below:

Filing an EEO Complaint: <https://www.dhs.gov/filing-equal-employment-opportunity-eeo-complaint>

Disability Access in the Department of Homeland Security (Section 504)
<https://www.dhs.gov/disability-access-department-homeland-security>.

All DHS Components maintain an accessibility webpage:

CBP:	http://www.cbp.gov/site-policy-notice/accessibility
USCIS:	https://www.uscis.gov/website-policies/accessibility
HQ:	https://www.dhs.gov/accessibility
OIG:	https://www.oig.dhs.gov/accessibility
FEMA:	https://www.fema.gov/accessibility
FLETC:	https://www.fletc.gov/accessibility-statement
ICE:	https://www.ice.gov/site-policies
USCG:	http://www.overview.uscg.mil/access/
TSA:	https://www.tsa.gov/accessibility
USSS:	https://www.secretservice.gov/section508/

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.

DHS currently has the following procedure covering rights under the Architectural Barriers Act:

https://www.dhs.gov/sites/default/files/publications/dhs-instruction-nondiscrimination-individuals-disabilities_03-07-15.pdf

Additionally, DHS employs Disability Access Coordinators at each Component to coordinate and provide support for compliance with Section 504.

In FY 2018, CRCL will coordinate DHS efforts with the DHS Office of the Chief Readiness Support Officer and Office of Facilities and Operational Support (OCRSO/FOS), to develop language required by Section 501, then socialize and implement the process throughout the Components.

The United States Access Board enforces the Architectural Barriers Act (ABA). Complainants may file an ABA complaint with the Access Board using an Online ABA Complaint Form or by e-mail, fax, or mail (please see the contact information below). For more information on how to file an ABA complaint, visit the Access Board's Complaint Form page.

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.

DHS issued the policy and procedures for Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-Employment). Directive

Number 065-01 outlines DHS' policy and Instruction Number 065-01-001 provides implementing its instruction. This policy requires all Components to identify Disability Access Coordinators and requires each Component to conduct a self-evaluation of DHS programs and activities to ensure accessibility.

As previously stated, CRCL will collaborate with OAST, OCRSO/FOS, and DHS Components to implement standardized language to meet the requirements for posting notices on the internal and external websites that define the rights of individuals with disabilities under Section 508 and the ABA.

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 2017, the overall average time frame for processing initial requests for reasonable accommodations was approximately 20 days.

The average number of days reported by DHS Components for FY 2017 are as follows:

CBP: 41.7 Days
 USCIS: 17 Days
 HQ: 21 Days
 FEMA: 2.5 Days
 ICE: 24.37 Days
 TSA: 35 Days
 USCG: 16.41 Days
 USSS: 11.65 Days

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

DHS is committed to providing effective reasonable accommodations to employees and applicants with disabilities. The overall average processing time for reasonable accommodation requests during FY 2017 was eighteen (18) days.

DHS developed the Employment of People with Disabilities: Roadmap to Success training in 2008, updated the materials in 2012, and more recently during FY 2017 to include the provision of the final rule implementing Section 501 of the Rehabilitation Act of 1973. All supervisors, hiring officials and human capital professionals are required to complete the training within sixty (60) days of appointment and every two years after appointment. All Components use the DHS training module.

In 2016, CRCL issued DHS Instruction Number 259-01-002, Procedures for Conducting a Department-Wide Search for a Reassignment as a Reasonable Accommodation of Last Resort. This Instruction outlines the procedures used to conduct a DHS-wide search for a position that will be used in a reassignment that is a reasonable accommodation of last resort. During FY 2017, to support the implementation of the Instruction, CRCL partnered with OCHCO, then developed and

delivered training to all Component-level Reasonable Accommodation Coordinators and human capital points of contact.

DHS continues to partner with the Department of Defense (DoD), Computer/Electronic Accommodation Program (CAP) to provide assistive technology accommodation solutions. During FY 2017, CAP provided 357 accommodations to 148 employees, totaling \$126,658.90 in cost savings to 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 personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

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

In FY 2017, DHS posted an updated notice to CRCL Connect Page, covering the requirement to provide personal assistance services (PAS). The language reads: Consistent with the EEOC's guidance until further notice, requests for Personal Assistance Service (PAS) will be processed under reasonable accommodations procedures. In addition, a link to the EEOC guidance on providing PAS was also added.

DHS plans to revise existing Reasonable Accommodation procedures during FY 2018, to include PAS.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer: Yes

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

Answer: Yes

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

DHS had two findings alleging harassment based on disability status during FY 2017. A summary of the corrective measures taken are as follows:

Finding # 1:

1. Post notice for 120 consecutive days.
2. Within 60 days of the date the decision is final, pay \$500 in non-pecuniary compensatory damages.
3. Provide training to the two EEO Specialists who processed the complaint.

Finding # 2:

1. Within 60 days of date of decision, provide at least three hours of training to the three named supervisors.
2. Within 90 days of date the decision becomes final, consider taking disciplinary action against the coworker and supervisor. Report who considered the disciplinary action, what factors were considered, and what action was taken. If no action is taken, report the reasons why.
3. Entitled to compensatory damages.
 - a. On September 9, 2017, a FAD awarded \$25,000 in non-pecuniary compensatory damages.
4. Entitled to attorney's fees and costs.
 - a. On September 9, 2017, a FAD awarded no attorney's fees.
5. Post notice for 60 days.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer: No

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

Answer: Yes

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

DHS had two findings alleging failure to provide a reasonable accommodation based on disability status during FY 2017. A summary of the corrective measures taken are as follows:

Finding # 1: (same as Finding # 1 for Harassment above)

1. Post notice for 120 consecutive days.
2. Within 60 days of the date the decision is final, pay \$500 in non-pecuniary compensatory damages.
3. Provide training to the two EEO Specialists who processed the complaint.

Finding #2:

1. Within 60 days of receipt of the decision, provide EEO training for the HR Specialist with a focus on the correct procedures and processing of reasonable accommodations.
2. Determine back pay from June 9, 2016 to January 26, 2017.
3. Within 90 days of date decision becomes final, consider taking disciplinary action against the HR Specialist. Report who considered the disciplinary action, what factors were considered, and what action was taken. If no action is taken, report the reasons why.
4. \$7,500 in non-pecuniary compensatory damages.

- | | |
|----|--|
| 5. | \$13,195 in attorney's fees and \$317.70 in costs. |
| 6. | Post notice for 60 days. |

Section VIII: Identification and Removal of Barriers

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

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

Answer: Yes

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

Answer: Yes

- 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.

Trigger 1	Lower than expected participation for individuals with disability (IWD) and targeted disabilities (IWTD) when compared to the regulatory goals of 12 percent for IWD and 2 percent for IWTD in grade clusters GS 1 – 10 and GS 11 – SES.	
Barrier(s)		
Objective(s)	Increase workforce participation rates of IWD and IWTD at all grade levels.	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
CRCL, OCHCO, OAST		Yes
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
No		No
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	
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	

Sources of Data		Sources Reviewed? (Yes or No)	Identify Information Collected		
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)	
12/30/2017	Issue Annual Hiring Goals for IWD and IWTD and socialize throughout DHS.	Yes			
09/30/2018	Update DHS Disability training module for managers and HR Professionals (Employment of People with Disability: A Roadmap to Success Training)	Yes			
03/30/2018	Develop mid-year reporting requirements to monitor Component progress with implementing the revised rule on Section 501 of the Rehabilitation Act.	Yes			
09/30/2018	Collaborate with OCHCO to revise DHS standard language on all vacancy announcements to encourage applicants with disabilities to apply, and to clearly explain Schedule A process and requesting reasonable accommodations.	Yes			
09/30/2018	Revise Reasonable Accommodation procedures and include procedures for providing Personal Assistance Services.	Yes			
09/30/2018	Develop and post notice of rights for employees and applicants under Section 508 of the Rehabilitation Act and the Architectural Barriers Act on the internal and external websites.	Yes			
03/30/2018	Implement and post Affirmative Action plan for Individuals with Disabilities to the DHS website internally and externally.	Yes			
Fiscal Year	Accomplishments				

Trigger 2	Individuals with disabilities and targeted disabilities are receiving recognition and awards at rates lower than expected when compared to individuals without disabilities.
Barrier(s)	
Objective(s)	Collaborate with OCHCO to review recognition and awards policy, practices and procedures, and determine next steps.

Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)		
CRCL, OCHCO		Yes		
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)		
No		No		
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected		
Workforce Data Tables	Yes			
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)	No			
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		
Fiscal Year	Accomplishments			

Trigger 3	Unavailability of applicant flow data by disability distribution to effectively analyze percentage of qualified applicants for career development opportunities, promotions and new hires. Limited access to Applicant Flow data using current systems (USA Staffing/Cognos, Monster Government Solutions, and Learning Management Systems).
Barrier(s)	
Objective(s)	Acquire accurate and reliable applicant flow data to analyze, monitor and inform program enhancements to increase representation of IWD and IWTD in all programs and hires.

Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)		
CRCL, OCHCO, SRDI, OCHCO Reports and Analysis		Yes		
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)		
No		No		
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected		
Workforce Data Tables	No			
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)	No			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	CRCL and OCHCO will work with OPM and Monster Government Solutions to modify data collection and reporting capabilities to match MD-715 data reporting requirements.	Yes		
09/30/2019	Coordinate with OCHCO to develop AFD framework for the SES Career Development Program, Pathways Program, and mentoring programs at the DHS level.	Yes		
Fiscal Year	Accomplishments			

Trigger 4	Lower than expected conversion rates of eligible Schedule A employees into competitive service.
Barrier(s)	
Objective(s)	Increase conversion rates of eligible Schedule A employees.

Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)		
CRCL, OCHCO		Yes		
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)		
No		No		
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected		
Workforce Data Tables	Yes			
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)	No			
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	Review and analyze current policies and procedures for excepted service appointments.	Yes		
01/30/2018	Monitoring Schedule A Conversions on a quarterly basis.	Yes		
09/30/2018	Coordinate efforts with OCHCO to develop DHS Schedule A policy and procedures.	Yes		
Fiscal Year	Accomplishments			

Trigger 5	Higher than expected separation rates for individuals with disabilities.
Barrier(s)	
Objective(s)	Increase retention rates of individuals with disabilities and targeted disabilities.
Responsible Official(s)	Performance Standards Address the Plan? (Yes or No)

Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)		
CRCL, OCHCO		Yes		
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)		
No		No		
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected		
Workforce Data Tables	Yes			
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)	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.	Yes		
01/30/2018	Monitor separations on a quarterly basis by disability distribution.	Yes		
06/30/2018	Collaborate with OCHCO to explore feasibility of implementing new retention programs specifically for IWD and IWTB.	Yes		
Fiscal Year	Accomplishments			

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

Activities are new for FY17.

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

Activites are new for FY17.

6. 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.

Activities are new for FY17.