

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

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

Section I: Efforts to Reach Regulatory Goals

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

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

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

Answer Yes

b. Cluster GS-11 to SES (PWD)

Answer Yes

Based on the utilization analysis of the DHS workforce by grade clusters, DHS has triggers for both clusters in the permanent workforce when compared to the 12 percent regulatory onboard goal. In FY 2018, PWDs participated at a rate of 8.73 percent in the GS-1 to GS-10 grades, and a rate of 11.55 percent in the GS-11 to SES grade clusters. While both rates are lower than expected, PWDs in the GS-11 to SES grade cluster, increased significantly, resulting in nearly 1.5 percent increase when compared to FY 17.

*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 grade clusters, DHS has triggers for both clusters in the permanent workforce when compared to the 2percent regulatory onboard goal. In FY 2018, PWTDs participated at a rate of 1.29 percent in the GS-1 to GS-10 grades, and a rate of 1.27 percent in the GS-11 to SES grade clusters. While both rates are lower than expected, there was a notable increased for PWTDs in the GS-11 to SES grade cluster, when compared to FY 17.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	62798	5506	8.77	836	1.33
Grades GS-11 to SES	123186	13728	11.14	1510	1.23

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

Annual hiring goals were established for individuals with disabilities, targeted disabilities and Schedule A hires and are formally announced on an annual basis from the DHS OCHCO to all DHS Components via the Human Capital Leadership Council (HCLC).

The HCLC is 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 via human resources, EEO, and Diversity practitioners and hiring officials. DHS set a 12 percent hiring goal 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 occupations; and a 1.5 percent hiring goal for Schedule A hires, also excluding law enforcement and transportation security officer occupations. In FY18, 10.4 percent of new hires were PWDs, and 1.7 percent were PWTs in non-law enforcement related 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 FY18 with PWDs representing 10.45 percent of the total workforce and PWTs representing 2.4 percent (when excluding both Law Enforcement and Transportation Security Officer occupations), both increases from FY17 (9.9 percent and 2.1 percent, respectively). In addition, Schedule A hires constituted 1.6 percent of all new hires in non-law enforcement related and non-TSO positions, exceeding the goal and increasing by 35 percent from FY17.

Section II: Model Disability Program

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

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

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

Answer Yes

CRCL's Equal Employment Opportunity and Diversity Division, has a full-time Departmental Disability Employment Program Manager who is responsible for implementing and maturing the DHS Disability Employment Program. Also at the departmental level, (OCHCO's Strategic Recruitment Diversity and Inclusion (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, Operations Warfighter Program, and 508 Program.

- 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 PWT	123	9	28	Laura Davis Disability Employment Program Manager laura.davis@hq.dhs.gov
Answering questions from the public about hiring authorities that take disability into account	132	9	29	Laura Davis Disability Employment Program Manager laura.davis@hq.dhs.gov
Processing reasonable accommodation requests from applicants and employees	18	0	25	Laura Davis Disability Employment Program Manager laura.davis@hq.dhs.gov
Section 508 Compliance	60	0	0	Cynthia Clinton-Brown Executive Director cynthia.clinton-brown@hq.dhs.gov

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Architectural Barriers Act Compliance	0	0	0	Karl Johnson Executive Director
Special Emphasis Program for PWD and PWTB	0	0	0	Laura Davis Disability Employment Program Manager laura.davis@hq.dhs.gov

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

Answer Yes

DHS CRCL/EEOD provided continuous training and guidance to all responsible staff to ensure they have the most up-to-date information and resources to 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. All Components have been provided with guidance and resources to assist with the development and/or revisions for processing reasonable accommodation requests, including requests for Personal Assistance Services as required by EEOC’s Final Rule implementing Section 501 of the Rehabilitation Act. As a result, DHS (at the Department level), U.S. Coast Guard, the Transportation Security Administration, and U.S. Secret Service have all submitted either draft or final revised procedures to EEOC for review and approval, pursuant to Executive Order 13164 during the reporting period. CRCL will continue to monitor the status and progress with the remaining Components in meeting this requirement.

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 No

Upon review of each Component’s response to compliance indicator and associated measures outlined in the Agency Self-Assessment, under B.4: The agency has sufficient budget and staffing to support the success of its EEO program, two of the nine Components have identified deficiencies impacting successful implementation of the disability program during the reporting period. CRCL will continue to monitor and provide technical assistance as needed to remove the noted deficiencies. In support of meeting this measure, CRCL continued efforts during FY 2018, 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. During FY 18, CRCL has been working in collaboration with OAST in the development of an enhanced ACMS reporting tool to include new reporting features consistent with EEOC’s reporting and record keeping requirements outlined in Section 501 of the Rehabilitation Act.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	A.2.b.3. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.
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Brief Description of Program Deficiency	C.2.a.6. Do the agency’s training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR § 1614.203(d)(2)]
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Brief Description of Program Deficiency	C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR §1614.203(d)(3)]
Brief Description of Program Deficiency	C.2.b.2. Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]
Brief Description of Program Deficiency	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.
Brief Description of Program Deficiency	C.2.c. Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR §1614.203(d)(6)]
Brief Description of Program Deficiency	C.2.c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.
Brief Description of Program Deficiency	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]
Brief Description of Program Deficiency	D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]
Brief Description of Program Deficiency	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.
Brief Description of Program Deficiency	E.4.b. Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]

Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

The Corporate Recruitment Council (CRC) conducts this activity and the Recruitment Outreach Marketing Matrix (ROMM) monitors it. The CRC, comprising recruiting personnel from DHS Components also assists in implementing the Strategic Outreach and Recruitment Plan (SOAR). In FY 2018, the CRC continued to maintain a Top 25 list of recruiting events to attend. From this list, OCHCO identified a priority subset for department-wide coordination focusing on DHS mission critical occupations (predominantly law enforcement). Specifically, as it pertains to individuals with disabilities and targeted disabilities, Strategic Recruitment Diversity and Inclusion: • Provided two employment information sessions about WRP, Pathways programs, how to apply through USAJOBS, and federal resume tips at Gallaudet University in March and September 2018. • Attended National

Geospatial-Intelligence Agency's (NGA) Persons with Disabilities Showcase and Recruitment Hiring Event to benchmark ideas for recruiting and hiring PWDs/PWTDs. • Attended Gallaudet University's career fair in October 2018. • Promoted the Top 5 recruiting events for PWD/PWTDs on a monthly basis to the CRC) to ensure component attendance. The events include colleges/universities, career fairs, and recruitment events. • Collaborating with USSS to provide a WRP lunch and learn session in November 2018 for U.S. Secret Service hiring managers and recruiters to regarding the use of the WRP program for internships or permanent jobs. • DHS maintains 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, National Technical Institute for the Deaf and Bender Disability Virtual Career Fair. • DHS attended over 290 recruiting events in over 25 states to attract candidates who identified as PWD/PWTD.

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)) To increase and promote the use of these hiring authorities, goals were established. In FY 2018, DHS hired 225 individuals with disabilities utilizing the Schedule A Hiring Authority, representing 1.6 percent of new hires excluding Law Enforcement and Transportation Security Officer occupations, exceeding the FY 2018 goal of 1.5 percent. Using the 30 Percent or More Disabled Veterans hiring authority, DHS hired an additional 1,346 individuals using authorities that take disability into account, representing 5.2% 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 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 are responsible for 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. During FY 2018, DHS initiated benchmarking efforts with other Federal agencies and drafted standard operating procedures focusing on sound strategies and best practices on utilizing Schedule A for employment, retention, and career development opportunities. 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 further revise this training course by 2020.

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, as well as recruiting and outreach events for disabled veterans through Operation Warfighter and Wounded Warrior programs. In FY 2018, DHS initiated a coordinated effort with all Components to update and revitalize the use of a consolidated listserv of over 2,300 contacts with organizations that assist individuals with disabilities including veterans with disabilities in securing and maintaining employment. DHS plans to finalize the list by the end of the first quarter in FY 2019 to support disability program outreach and recruitment efforts.

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 Yes

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

During FY 2018, DHS nearly reached the 12 percent hiring goal for PWD with over 2,043 new hires, representing 11.03, a slight decrease from 12.04 percent of all new hires reported in FY 2017. DHS did not reach the 2 percent hiring goal for PWTD. PWTD represented 1.03 percent of all new hires, which falls below the 2 percent hiring goal. When excluding law enforcement and transportation security officer occupations, the percentage increases to 1.7 percent for PWTD. Disability workforce data includes employees who self-identify as having a disability and employees appointed under Schedule A and 30 percent or more Disabled Veterans who do not otherwise identify as having a disability.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	0				
% of Qualified Applicants	70410	3.94	0.00	1.85	0.00
% of New Hires	14928	4.37	0.00	0.64	0.00

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

a. New Hires for MCO (PWD) Answer Yes

b. New Hires for MCO (PWTD) Answer Yes

Based on a review of B7 Applications and Hires which represents AFD and hires from all DHS Components, with the exception of FEMA, including only those who self-identify, triggers exist for the following occupations of the nine (9) priority mission-critical occupations for PWD and PWTD: PWD: 1802 - Compliance Inspection and Support: Qualified 4.41 percent; Selections 4.07 percent 1895 - Customs and Border Protection: Qualified 1.62 percent; Selections 0.96 percent 1896 - Border Patrol Agent: Qualified 2.04 percent; Selections 0.61 percent PWTD: 1802 - Compliance Inspection and Support: Qualified 2.22 percent; Selections 0.49 percent 1895 - Customs and Border Protection: Qualified 0.81 percent; Selections 0.00 percent 1896 - Border Patrol Agent: Qualified 0.94 percent; Selections 0.20 percent 1811 - Criminal Investigator: Qualified 0.86 percent; Selections 0.00 percent 2210 - Information Technology Management: Qualified 2.32 percent; Selections 1.26 percent All of the above mission-critical occupations listed above, with the exception of 2210, have physical and or medical requirements that cause lower than expected selection rates for both PWD and PWTD.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	
0083FEDERAL POLICE OFFICER	8809	1.09	0.03	0.41	0.00
0089EMERGENCY MANAGEMENT	195	8.21	6.15	3.08	1.03
1801GEN INSPECTION, INVESTIGATIVE ENFORCEMENT, & COMPLIANCE	59089	1.08	0.19	0.50	0.05
1802COMPLIANCE INSPECTION & SUPPORT	232899	0.49	0.20	0.25	0.02
1811CRIMINAL INVESTIGATORS	15054	1.00	0.03	0.47	0.00
1881CUSTOMS AND BORDER PROTECTION INTERDICTION	25	0.00	4.00	0.00	0.00
1895CUSTOMS & BORDER PROTECTION OFFICERS	4007	0.40	0.25	0.20	0.00
1896BORDER PATROL AGENTS	9435	0.53	0.06	0.24	0.02
2210INFORMATION TECHNOLOGY SPECIALISTS	12537	5.39	0.30	2.37	0.03

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

a. Qualified Applicants for MCO (PWD)

Answer N/A

b. Qualified Applicants for MCO (PWTD)

Answer N/A

Relevant applicant pool data is not available. Identifying which current DHS employees would qualify for a job series they are not currently in is a difficult undertaking. The Human Capital offices do not adjudicate applicant qualifications until an applicant applies for a specific position, 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. Based on this, we are not attempting to tabulate relevant applicant pools for this reporting cycle.

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

a. Promotions for MCO (PWD)

Answer Yes

b. Promotions for MCO (PWTD)

Answer Yes

Based on a review of B9 Selections for Internal Competitive Promotions for Major Occupations, which represents AFD and selections from all DHS Components, with the exception of FEMA, triggers exist for the following occupations for PWD and PWTDs when comparing the qualified applicant pool to the number of selections for promotions: PWD 1802- Compliance Inspection and Support: Qualified 7.80 percent; Selections 4.36 percent PWTD 1802 - Compliance Inspection and Support: Qualified 4.45 percent; Selections 0.63 percent 2210 - Information Technology Management: Qualified 3.74 percent; Selections 2.89 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. In FY 2019, DHS will explore the feasibility of creating a mentoring program focused on individuals with disabilities. Until then, coordinated efforts will be implemented to encourage employees with disabilities to participate in existing DHS advancement programs.

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 education goals. In FY 2018, 31 employees participated in the Department of Defense Senior Service School master's degree programs. DHS also nominates employees to attend the Center for Homeland Defense and Security (CHDS) Masters and Executive Leaders Programs. DHS promotes the use of the OPM's Federal Academic Alliance programs where employees can take advantage of various discounts from more than 15 different colleges/universities. DHS employees have, or will have, access to training/career development courses by a variety of means: • DHS's Senior Executive Service Candidate Development Program (SES CDP), advertised both internally and externally to DHS; • 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. • 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. DHS continues to use the Pathways Program, the Federal Government's primary entrance point for students and recent graduates. In FY 2018, DHS hired 346 Pathways student interns, 71 recent graduates, and 11 Presidential Management Fellows, totaling 428 Pathways Program participants. Of these, 26.7 percent identified as PWD and 1.40 percent were PWTD. (Note: PMF is not represented in the chart below, as DHS reports the data separately from the other Pathways programs.) The DHS Mentoring Program is a formal program that provides enriching experiences through reciprocal relationships and opportunities for personal and professional growth while sharing knowledge, leveraging skills, and cultivating talent. The DHS Mentoring Program is open to all DHS federal employees. The Mentoring Announcement is sent out by DHS Management to all DHS employees 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 and areas of improvement. The Mentoring Connection contract which coordinates the program has been extended until March 31, 2019. In FY 2018, the DHS Mentoring programs coordinated 272 mentoring/mentee partnerships.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Coaching Programs						
Training Programs						
Detail Programs						
Internship Programs		346		15.0		1.15
Fellowship Programs		71		26.7		1.4
Mentoring Programs		266		10.5		2.2
Other Career Development Programs	592	31	3.21	0.0	1.52	0.0

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

a. Applicants (PWD)

Answer N/A

b. Selections (PWD)

Answer 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 2018, 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 were selected at rates significantly above those expected in the reported, with the exception of the DHS Headquarters Mentoring Program and the SES Candidate Development Program (CDP). DHS will continue to include encouraging language in all career development programs to increase the participation of PWDs.

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

a. Applicants (PWTD)

Answer N/A

b. Selections (PWTD)

Answer 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 2018, 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 PWTD to the 2 percent goal, PWTDs are not participating at rates expected in the programs outlined above, with the exception of the DHS Headquarters Mentoring program, where they exceeded the 2% goal.

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 (PWD) and PWTD (PWTD) are not receiving awards at the expected rates when compared to the corresponding inclusion rate. DHS-wide, this was identified for the following categories: PWD Benchmark Cash awards 1 – \$500: PWD Inclusion Rate: 18.73% IWOD Inclusion Rate: 21.88% Cash awards \$500+: PWD Inclusion Rate: 52.76% IWOD Inclusion Rate: 62.50% PWTD Benchmark Cash awards \$500+: PWTD Inclusion Rate: 48.88% IWOD Inclusion Rate: 62.50%

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards: 1-9 hours : Total Time-Off Awards Given	21317	10.45	69.90	1.50	8.96
Time-Off Awards: 9+ hours : Total Time-Off Awards Given	53448	12.47	84.18	1.37	11.10

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$100 - \$500: Total Cash Awards Given	45038	8.18	91.82	1.35	6.83
Cash Awards: \$501+: Total Cash Awards Given	107406	9.67	90.33	1.09	8.57

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 (PWD) and PWTD (PWTD) are exceeding the inclusion rate benchmark for quality step increases (QSIs). QSI Awards PWD Inclusion Rate: 1.15% PWTD Inclusion Rate: 1.25% Benchmark IWOD Inclusion Rate: 0.80%

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Quality Step Increases (QSI): Total QSIs Awarded	1484	15.23	84.77	2.02	13.21
Performance Based Pay Increase	0	0.00	0.00	0.00	0.00

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 2018.

D. PROMOTIONS

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

a. SES

i. Qualified Internal Applicants (PWD)	Answer	N/A
ii. Internal Selections (PWD)	Answer	N/A
b. Grade GS-15		
i. Qualified Internal Applicants (PWD)	Answer	Yes
ii. Internal Selections (PWD)	Answer	Yes
c. Grade GS-14		
i. Qualified Internal Applicants (PWD)	Answer	Yes
ii. Internal Selections (PWD)	Answer	Yes
d. Grade GS-13		
i. Qualified Internal Applicants (PWD)	Answer	Yes
ii. Internal Selections (PWD)	Answer	Yes

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 (PWD) participation rates within the Qualified Internal Applicants and Selections indicate triggers. DHS SES positions were all announced and open to the public during FY 2018. 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 (PWD) were lower than expected. PWD SES Selections: 9.59% PWD Relevant Applicant Pool: 13.00%

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

a. SES		
i. Qualified Internal Applicants (PWTD)	Answer	N/A
ii. Internal Selections (PWTD)	Answer	N/A
b. Grade GS-15		
i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	Yes
c. Grade GS-14		
i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	No
d. Grade GS-13		
i. Qualified Internal Applicants (PWTD)	Answer	No
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 participation rates within the Qualified Internal Applicants indicate no triggers for Grades GS-13 through GS-15. However, data revealed a trigger for Internal Selections of PWTD for GS-15. DHS SES positions were all announced and open to the public during FY 2018. 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 were lower than expected. PWTD SES Selections: 0.00% PWTD 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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWD)	Answer	Yes
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 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 (PWD) 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 4.88% Not Available 12% New Hires to GS-15 21.53% Not Available 12% New Hires to GS-14 20.70% Not Available 12% New Hires to GS-13 26.67% Not Available 12% With the exception of new hires for SES, all other senior grades (GS-15 through GS-13) increased when compared to FY 2017.

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

a. New Hires to SES (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	No

DHS was unable to analyze new hires for PWTD (PWTD), 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 (PWTD) exceeded the 2 percent goal for all senior grades with the exception of GS-14. Hires Qualified Applicant Pool Regulatory Goal New Hires to SES 2.44% Not Available 2% New Hires to GS-15 2.08% Not Available 2% New Hires to GS-14 1.96% Not Available 2% New Hires to GS-13 2.22% Not Available 2% The percentage of hires in Grades GS-13 and GS-14, increased when compared to FY 2017.

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

a. Executives

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

- | | | |
|--|--------|-----|
| ii. Internal Selections (PWD) | Answer | Yes |
| b. Managers | | |
| i. Qualified Internal Applicants (PWD) | Answer | N/A |
| ii. Internal Selections (PWD) | Answer | No |
| c. Supervisors | | |
| i. Qualified Internal Applicants (PWD) | Answer | N/A |
| ii. Internal Selections (PWD) | Answer | Yes |

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 Supervisors (First-Level Grades 12 and Below positions. No trigger was identified for Manager (Mid-Level Grades 13-14) positions. PWD Executive Selections: 8.92% PWD Relevant Applicant Pool: 13.35% PWD Manager Selections: 9.54% PWD Relevant Applicant Pool: 9.37% PWD Supervisor Selections: 4.37% PWD Relevant Applicant Pool: 13.94%

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

- | | | |
|---|--------|-----|
| a. Executives | | |
| i. Qualified Internal Applicants (PWTB) | Answer | N/A |
| ii. Internal Selections (PWTB) | Answer | Yes |
| b. Managers | | |
| i. Qualified Internal Applicants (PWTB) | Answer | N/A |
| ii. Internal Selections (PWTB) | Answer | Yes |
| c. Supervisors | | |
| i. Qualified Internal Applicants (PWTB) | Answer | N/A |
| ii. Internal Selections (PWTB) | Answer | Yes |

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 all supervisory positions. PWTB Executive Selections: 0.70% PWTB Relevant Applicant Pool: 1.47% PWTB Manager Selections: 0.74% PWTB Relevant Applicant Pool: 0.97% PWTB Supervisor Selections: 0.14% PWTB Relevant Applicant Pool: 1.74%

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

- | | | |
|------------------------------------|--------|----|
| a. New Hires for Executives (PWD) | Answer | No |
| b. New Hires for Managers (PWD) | Answer | No |
| c. New Hires for Supervisors (PWD) | Answer | No |

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 12 percent goal as an alternative comparator, no triggers were identified for hires to supervisory positions for PWD (PWD). PWD Executive Selections: 18.94% PWD Regulatory Goal: 12.00% PWD Manager Selections: 37.04% PWD Regulatory Goal: 12.00% PWD Supervisor Selections: 32.35% PWD Regulatory Goal: 12.00%

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

- | | | |
|-------------------------------------|--------|----|
| a. New Hires for Executives (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 2 percent goal as an alternative comparator, no triggers were identified for hires to supervisory positions for PWTD (PWTD). PWTD Executive Selections: 2.27% PWD Regulatory Goal: 2.00% PWTD Manager Selections: 2.22% PWD Regulatory Goal: 2.00% PWTD Supervisor Selections: 5.88% PWD Regulatory Goal: 2.00%

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer No

During FY 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 2 years of service, and 4 were converted by other means. Overall DHS experienced an increase in conversions when compared to FY 2017. DHS will continue to educate supervisors and monitor progress on a quarterly basis.

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 | Yes |

Based on a review of MD-715 Table B14: Separations by Type of Separation - Distribution by Disability, PWD are exceeding the inclusion rate benchmark for voluntary and involuntary separations. Voluntary Separations PWD (PWD) Inclusion Rate: 7.60% Benchmark PWOD (IWOD) Inclusion Rate: 5.95% Involuntary Separations PWD (PWD) Inclusion Rate: 0.89% Benchmark PWOD (IWOD) Inclusion Rate: 0.66%

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permenant Workforce	188225	10.46	89.54
Total Separations	14324	11.67	88.33
Voluntary Separations	12712	11.76	88.24
Involuntary Separations	1612	10.92	89.08

3. Using the inclusion rate as the benchmark, did the percentage of PWD 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, PWTDS are exceeding the inclusion rate benchmark for both voluntary and involuntary separations. Voluntary Separations PWTD (PWTD) Inclusion Rate: 7.99% Benchmark PWTD (IWOD) Inclusion Rate: 5.95% Involuntary Separations PWTD (PWTD) Inclusion Rate: 1.41% Benchmark PWOD (IWOD) Inclusion Rate: 0.66%

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permenant Workforce	188225	1.28	98.72
Total Separations	14324	1.58	98.42
Voluntary Separations	12712	1.51	98.49
Involuntary Separations	1612	2.11	97.89

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 the DHS Department exit surveys completed during FY 2018, which includes all Components with the exception of TSA and USSS, approximately 18% percent of all employees voluntarily separating indicated their primary reason for leaving, resulting in 1,506 responses. Of those responses, 215 or 14.28% 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, Moving to Another DHS Component, or Other included: Supervision/Management –11.63% Advancement Opportunities – 11.63% Personal/Family Related – 8.84% The top reasons mentioned above are the same as PWOD. When comparing leaving based on health-related reasons, PWD indicated health-related reasons as the primary reason 5.58% of the time compared to 1.82% for individuals without disabilities. Further review revealed a 4.18% 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: Advancement Opportunities – 11.11% Supervision/Management –11.11% Geographic Location and Salary Pay (tied) – 9.52% Health related reasons were indicated by 6.35% of the PWTD respondents.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

DHS Accessibility Website address: <https://www.dhs.gov/accessibility> During FY 2018, DHS updated both its web page for accessibility and internal page (<http://dhsconnect.dhs.gov/pages/accessibility.aspx>) for consistency to include a description of rights and how to file a Section 508 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.

DHS Accessibility Website address: <https://www.dhs.gov/accessibility> During FY 2018, DHS updated both its web page for accessibility and internal page (<http://dhsconnect.dhs.gov/pages/accessibility.aspx>) for consistency to include a description of rights and how to file a complaint under the Architectural Barrier Act.

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 2018, CRCL collaborated with OAST 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. In additional CRCL stood-up a working group comprising representatives from CRCL Compliance, CRCL Anti-Discrimination Group, OAST, and Components to draft standard operating procedures for processing 508 complaints. DHS anticipates completing and implementing the new procedures by the end of the second quarter in FY 2019.

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 2018, the overall average time frame for processing initial requests for reasonable accommodations was approximately 39 days. The average number of days reported by DHS Components for FY 2018 are as follows: CBP: 108 Days USCIS: 19 Days HQ: 44 Days FEMA: 15 Days ICE: 68 Days TSA: 29 Days USCG: 16 Days USSS: 10 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 2018 was thirty nine (39) days. All DHS Components provide reasonable accommodation training to managers and supervisors on a regular basis. Additionally, consistent with the new requirements outline in EEOC's Final Rule implementing revisions to Section 501 of the Rehabilitation Act of 1973, DHS and its Components have been working on revised reasonable accommodation and personal assistance service procedures. DHS and three of the nine Components (USCS, TSA, and USSS) submitted revised procedures to EEOC as required for review during FY 2018. In support of DHS's reasonable accommodation program, CRCL has been collaborating with OAST on the development of an enhanced Accessibility Compliance Management System, to manage, track and report on all reasonable accommodation requests. DHS plans to deploy the new system by second quarter of FY 2019. The new system will have a built in reporting capability to produce all reporting requirements consistent with Section 501 and Executive Order 13164. 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. CRCL will develop a plan in FY 2019 to revise the training module by 2020. In FY 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. Procedures were submitted to EEOC on May 15, 2017 as required. DHS continues to partner with the Department of Defense (DoD), Computer/Electronic Accommodation Program (CAP) to provide assistive technology accommodation solutions. During FY 2018, CAP

provided 283 accommodations to 126 employees, totaling \$89,857.11 in cost savings to DHS.

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

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

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

In FY 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. This guidance is now posted to DHS's public facing webpage at the following URL: <https://www.dhs.gov/reasonable-accommodations-dhs>. In FY 2018 DHS drafted revisions to its existing Reasonable Accommodation procedures to include PAS. The initial draft was submitted to EEOC via the raprocedures@eeoc.gov mailbox on September 28, 2018, for review as required. DHS received feedback and incorporated recommendations. The final is pending senior level review and approval. DHS anticipates issuing final procedures by the end of second quarter of FY 2019.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer No

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

Answer Yes

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

During FY 2018, DHS had a lower percentage of PWDs who filed a formal EEO Complaint (15.15%) alleging harassment, as compared to the government-wide average of 18.05%. DHS had 63 settlement agreements and one finding alleging harassment (hostile work environment) based on disability status during FY 2018. A summary of the corrective measures taken are as follows: Finding # 1: 1. Post notice for 180 consecutive days. 2. Conduct eight hours of EEO training. 3. Consider disciplinary action against the supervisor. 4. Provide the opportunity to submit a request for attorney's fees.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer No

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

Answer Yes

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

During FY 2018, DHS had a lower percentage of PWDs who filed a formal EEO Complaint (8.02%) alleging failure to provide a reasonable accommodation compared to the government-wide average of 12.50%. The percentage of these complaints decreased by nearly 1.50% when compared to FY 2017. DHS had 48 settlement agreements and two findings alleging failure to provide a reasonable accommodation based on disability status during FY 2018. A summary of the corrective measures taken are as follows: Finding # 1: (same as Finding # 1 for Harassment above) 1. Post notice for 180 consecutive days. 2. Conduct eight hours of EEO training. 3. Consider disciplinary action against the supervisor. 4. Provide the opportunity to submit a request for attorney's fees. Finding #2: Within 60 days after the date of the AJ Decision 1. Pay \$3,395.07 in pecuniary compensatory damages 2. Pay \$10,000.00 in non-pecuniary compensatory damages. 3. Pay \$38,550.78 in attorney's fees and costs.

Section VIII: Identification and Removal of Barriers

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

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

Answer Yes

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

Answer Yes

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

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Individuals with disabilities and targeted disabilities are receiving recognition and awards at rates lower than expected when compared to individuals without disabilities.							
STATEMENT OF BARRIER GROUPS:	Barrier Group People with Disabilities People with Targeted Disabilities							
BARRIER ANALYSIS: Provide a description of the steps taken and data analyzed to determine cause of the condition.								
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	To be determined							
Objective	Collaborate with OCHCO to review recognition and awards policy, practices and procedures, and determine next steps. <table border="1" data-bbox="483 978 1505 1115"> <tr> <td>Date Objective Initiated</td> <td>Sep 30, 2017</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2019</td> </tr> </table>				Date Objective Initiated	Sep 30, 2017	Target Date For Completion Of Objective	Sep 30, 2019
Date Objective Initiated	Sep 30, 2017							
Target Date For Completion Of Objective	Sep 30, 2019							
Responsible Officials	Veronica Venture Deputy Officer & Director of Equal Employment Opportunity and Diversity Angela Bailey Chief Human Capital Officer							
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	09/30/2019					
Fiscal Year 2017 2018	Accomplishments Newly established. During FY 2018 CRCL identified initial data sources and policies and procedures at the departmental level to begin review. As initiated 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							

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	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 (USASTaffing/Cognos, Monster Government Solutions, and Learning Management Systems).							
STATEMENT OF BARRIER GROUPS:	Barrier Group People with Disabilities People with Targeted Disabilities							
BARRIER ANALYSIS: Provide a description of the steps taken and data analyzed to determine cause of the condition.								
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	To be determined							
Objective	Acquire accurate and reliable applicant flow data to analyze, monitor and inform program enhancements to increase representation of PWD and PWTD in all programs and hires. <table border="1" data-bbox="483 976 1502 1121"> <tr> <td>Date Objective Initiated</td> <td>Sep 30, 2017</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2020</td> </tr> </table>				Date Objective Initiated	Sep 30, 2017	Target Date For Completion Of Objective	Sep 30, 2020
Date Objective Initiated	Sep 30, 2017							
Target Date For Completion Of Objective	Sep 30, 2020							
Responsible Officials	Veronica Venture Deputy Officer & Director of Equal Employment Opportunity and Diversity Angela Bailey Chief Human Capital Officer							
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
2018	<p>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.</p> <p>CRCL participates in monthly calls with OPM regarding applicant flow data and continues to work with OCHCO IT to integrate applicant flow data from OPM and Monster Government Solutions into a central data warehouse. Until the data flows to the central data warehouse, CRCL will continue to extract applicant flow data from OPM's USASTaffing system and obtain data directly or via data calls for DHS Components that use Monster Government Solutions.</p> <p>Coordinate with OCHCO to develop AFD framework for the SES Career Development Program, Pathways Program, and mentoring programs at the DHS level.</p> <p>In FY 2018, DHS reported participation and applicant flow counts and percentages for the SES Career Development Program, which is the only program managed at the Department level that leads to promotion without further competition. The SES Career Development Program was announced in USAJobs and USASTaffing was used to track applications, qualification, referral, and selection. 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. In FY 2019, DHS plans to identify the solution set for follow-on capability, including reporting capability, such as that required for MD-715.</p> <p>CRCL is working with OCHCO IT to obtain training and developmental opportunity participant data by diversity categories from PALMS and the central data warehouse. These systems are under development and diversity data will be added when feasible. Until the diversity data is available directly from PALMS and the central data warehouse, CRCL will continue to work with OCHCO to extract and manually determine the diversity status of developmental program participants.</p>

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Lower than expected conversion rates of eligible Schedule A employees into competitive service.							
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> People with Disabilities People with Targeted Disabilities							
BARRIER ANALYSIS: Provide a description of the steps taken and data analyzed to determine cause of the condition.								
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	To be determined							
Objective	Increase conversion rates of eligible Schedule A employees. <table border="1" data-bbox="487 951 1502 1094"> <tr> <td>Date Objective Initiated</td> <td>Sep 30, 2017</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2018</td> </tr> </table>				Date Objective Initiated	Sep 30, 2017	Target Date For Completion Of Objective	Sep 30, 2018
Date Objective Initiated	Sep 30, 2017							
Target Date For Completion Of Objective	Sep 30, 2018							
Responsible Officials	Veronica Venture Deputy Officer CRCL & Director Equal Employment Opportunity and Diversity Angela Bailey Chief Human Capital Officer							
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	09/30/2018					
01/30/2018	Monitoring Schedule A Conversions on a quarterly basis.	Yes		12/12/2018				
09/30/2018	Coordinate efforts with OCHCO to develop DHS Schedule A policy and procedures.	Yes	09/30/2019					

Fiscal Year	Accomplishments
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 2 years of service, and 4 were converted by other means. Overall DHS experienced an increase in conversions when compared to 101, or 53%, %, during FY 2017.</p> <p>Review and analyze current policies and procedures for excepted service appointments.</p> <p>CRCL, in coordination with OCHCO/SRDI, began reviewing existing policies and procedures at the Department level during FY 2018. As a result, we identified several excepted service policies, and found that procedures for Schedule A, 5 CFR 213.3102(u), for hiring people with severe physical disabilities, psychiatric disabilities, and intellectual disabilities, are not included.</p> <p>Monitoring Schedule A Conversions on a quarterly basis.</p> <p>CRCL has developed a Schedule A reporting and tracking tool to monitor DHS' Schedule A workforce by Components. The tracking tool provides a summary review of Schedule A employees by:</p> <ul style="list-style-type: none"> • Total Eligible • Total Converted <ul style="list-style-type: none"> o Conversions to career or career conditional after 24 months o Conversions to career or career conditional before 24 months o Conversion Other o Separated before conversion • Total Separations • Eligible not Converted • No Longer Eligible at end of FY 2018 (but was eligible at some point in the given year) • Not Eligible for Conversion <p>CRCL shares updated summary reports with all Components through the Disability Employment Advisory Council, which includes Component level Disability Program Managers and Selective Placement Program Coordinators. Upon request, CRCL provides detailed reports to support follow-up actions at the Component level as appropriate.</p> <p>This activity is complete. CRCL will continue to provide reports and monitor on a quarterly basis as a standard practice.</p> <p>Coordinate efforts with OCHCO to develop DHS Schedule A policy and procedures.</p> <p>CRCL and SRDI began efforts to benchmark other Federal agencies to identify best practices. As a result, SRDI has drafted a proposed standard operating procedure which is currently in the review process.</p>

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Higher than expected separation rates for individuals with disabilities.							
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> People with Disabilities People with Targeted Disabilities							
BARRIER ANALYSIS: Provide a description of the steps taken and data analyzed to determine cause of the condition.								
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	To be determined							
Objective	Increase retention rates of individuals with disabilities and targeted disabilities. <table border="1" data-bbox="487 951 1503 1098"> <tr> <td>Date Objective Initiated</td> <td>Sep 30, 2017</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2020</td> </tr> </table>				Date Objective Initiated	Sep 30, 2017	Target Date For Completion Of Objective	Sep 30, 2020
Date Objective Initiated	Sep 30, 2017							
Target Date For Completion Of Objective	Sep 30, 2020							
Responsible Officials	Veronica Venture Deputy Officer CRCL & Director Equal Employment Opportunity and Diversity Angela Bailey Chief Human Capital Officer							
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	01/30/2020					
01/30/2018	Monitor separations on a quarterly basis by disability distribution.	Yes		10/16/2018				
06/30/2018	Collaborate with OCHCO to explore feasibility of implementing new retention programs specifically for PWD and PWTD.	Yes	09/30/2020					
09/30/2020	Conduct study on reasonable accommodation requests and procedures for delayed and denied accommodations to identify any potential correlation to high separations.	Yes	09/14/2018					

Fiscal Year	Accomplishments
2018	<p>Upon review PWD continue to separate voluntarily and involuntarily at a higher rate when compared to employees without disabilities. The overall percentage of separations for PWD increased from 10.05 percent in FY 2017 to 11.67 percent in FY 2018. Similarly, PWTD experienced an increase for involuntary separations from 1.36 percent in FY 2017 to 2.11% in FY 2018, while voluntary separations for PWTD decreased from 1.62 percent in FY 2017 to 1.51 percent in FY 2018.</p> <p>Review and analyze exit surveys to identify barriers to retention.</p> <p>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 14.28% percent of the respondents indicated they had 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 are the same for respondents without disabilities, including:</p> <p>Supervision/Management –11.63% Advancement Opportunities – 11.63% Personal/Family Related – 8.84%</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% of the time compared to 1.82% for respondents without disabilities.</p> <p>In September 2018, DHS OCHCO convened an exit survey working group due to the low participation rates overall. The working group is led by the DHS Engagement Team Lead, within the Chief Learning and Engagement Office, OCHCO and consists of representatives from all DHS Components to include representation from CRCL. The initial goal of the working group was to review current DHS Exit Survey and Component Exit Survey and provide recommended changes to the DHS survey that will improve participation and usefulness of data and review off boarding practices related to exit survey in order to determine best practices for improving participation. CRCL representatives will ensure consideration of disability related questions are included in the final submission of established core questions. The working group plans to achieve the goals outlined above and begin implementation by April 2019.</p> <p>The target date for completion on this activity will be extended for two years to allow for DHS to obtain reliable data to determine why employees with disabilities are leaving at a higher rate than employees without disabilities based on the inclusion benchmark.</p> <p>Monitor separations on a quarterly basis by disability distribution.</p> <p>CRCL developed a quarterly dashboard to monitor workforce demographics, which includes separations by disability. CRCL will continue to monitor separations on a quarterly basis as a standard practice.</p> <p>Explore feasibility of implementing new retention programs specifically for PWD and PWTD.</p> <p>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 all Components to 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 DHS to support our affirmative employment obligations.</p>

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Lower than expected participation for individuals with disability (PWD) and targeted disabilities (PWTD) when compared to the regulatory goals of 12 percent for PWD and 2 percent for PWTD in grade clusters GS 1 – 10 and GS 11 – SES.					
STATEMENT OF BARRIER GROUPS:	Barrier Group People with Disabilities People with Targeted Disabilities					
BARRIER ANALYSIS: Provide a description of the steps taken and data analyzed to determine cause of the condition.						
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	To be determined					
Objective	Increase workforce participation rates of PWD and PWTD at all grade levels. <table border="1" data-bbox="487 945 1495 1100"> <tr> <td>Date Objective Initiated</td> <td>Sep 30, 2017</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Oct 30, 2020</td> </tr> </table>		Date Objective Initiated	Sep 30, 2017	Target Date For Completion Of Objective	Oct 30, 2020
Date Objective Initiated	Sep 30, 2017					
Target Date For Completion Of Objective	Oct 30, 2020					
Responsible Officials	Cynthia Clinton-Brown Executive Director, OAST Angela Bailey Chief Human Capital Officer Veronica Venture Deputy Officer CRCL & Director for Equal Employment Opportunity and Diversity					

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 PWD and PWTD and socialize throughout DHS.	Yes		12/27/2017
09/30/2018	Update DHS Disability training module for managers and HR Professionals (Employment of People with Disability: A Roadmap to Success Training	Yes	10/30/2020	
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		03/08/2018
09/30/2018	Collaborate with OCHCO to revise DHS standard language on all vacancy announcements to encourage applicants with disabilities to apply, and to clearly explain Schedule A process and requesting reasonable accommodations.	Yes	09/30/2019	
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		09/30/2018
03/30/2018	Implement and post Affirmative Action plan for Individuals with Disabilities to the DHS website internally and externally.	Yes	07/19/2018	07/19/2018
09/30/2020	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	09/14/2018	
04/01/2019	Develop a bi-annual reports to monitor Components progress toward increasing participation of PWD and PWTD within Mission Critical Occupations.	Yes	09/14/2018	
09/30/2018	Revise Reasonable Accommodation procedures and include procedures for providing Personal Assistance Services.	Yes	10/01/2019	

Fiscal Year	Accomplishments
2017	Newly established.
2018	<p>Hiring Goals:</p> <p>During FY 2018, DHS set a 12 percent hiring goal for Persons with Disabilities (PWD) at all grade levels; a 2 percent hiring goal for Persons with Targeted Disabilities (PWTD) at all grade levels, excluding law enforcement and transportation security officer occupations; and a 1.5 percent hiring goal for Schedule A hires, also 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 related and non-TSO positions. While the Department did not meet the new hire goals listed above in these two areas, it should be noted that DHS ended FY 2018 with PWDs representing 10.5 percent of the total workforce and PWTDs representing 2.4 percent, both increases from FY 2017 (9.9 percent and 2.1 percent, respectively). In addition, Schedule A hires constituted 1.6 percent of all new hires in non-law enforcement related and non-TSO positions, exceeding the goal and increasing by 35 percent from FY 2017.</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 Component. 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>Disability Training:</p> <p>The Roadmap to Success training was updated during FY 2017 and FY 2018 to include the provision of the Final Rule covering Section 501 of the Rehabilitation Act, as well as other necessary revisions and updated resources. DHS plans to revise this training course by FY 2020.</p> <p>Mid-Year Reporting Requirements:</p> <p>CRCL issued a revised mid-year reporting requirement to all DHS Components to assist with monitoring and tracking progress in obtaining 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 compiled all Component responses and reported out the collective status of EEO programs and provided additional technical guidance where necessary.</p> <p>Revise DHS Standard Language on All Vacancy Announcements:</p> <p>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>Revise Reasonable Accommodation and Personal Assistance Services Procedures:</p> <p>During FY 2018, CRCL drafted revised reasonable accommodation procedures to include procedures for processing personal assistance services consistent with the new obligations outlined in Section 501 of the Rehabilitation Act. As a result, DHS (Departmental), U.S. Coast Guard, the Transportation Security Administration, and U.S. Secret Service have all submitted either draft or final revised procedures to EEOC for review and approval pursuant to Executive Order 13164, during the reporting period. CRCL will continue to monitor and track the status and progress with the remaining Components in meeting this requirement. DHS's procedures require all updated reasonable accommodation procedures to be submitted to CRCL for review prior to submission to EEOC.</p> <p>Develop and post notice of rights under Section 508 and the Architectural Barriers Act on the internal and external websites.</p> <p>During FY 2018, DHS updated both its web page for accessibility and internal connect page (http://dhsconnect.dhs.gov/pages/accessibility.aspx) for consistency to include a description of rights and how to file a complaint under Section 508 complaint.</p> <p>Implement and post FY 2017 Affirmative Action Report and FY 2018 Plan</p> <p>As required, DHS posted its FY 2017 Affirmative Action Report and FY 2018 Plan on DHS' website at the following location. www.dhs.gov/reports-office-civil-rights-and-civil-liberties. CRCL continues to collaborate with OCHCO and Components to ensure effective implementation on a regular basis.</p>

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

Lower than Expected Participation Rates for IWD and IWTD: Nothing to report. Recognition and Awards at lower than expected rates for IWD and IWTD: N/A - DHS began planned activities during FY 2018 and concluded that additional time is necessary to effectively conduct a thorough review. Unavailability of applicant flow data to analyze participation rates for IWD and IWTDs in career development and promotions: Planned activities proceeding on schedule. Lower than expected conversion rates of eligible Schedule A employees: DHS began planned activities during FY 2018, and concluded that additional time is necessary to effectively conduct a thorough review. Higher than expected separation rates for IWD: Exit Surveys – Low response rate and reliable data. CRCL will continue to serve on the working group and provide recommendations and technical guidance.

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

Lower than Expected Participation Rates for IWD and IWTD: To be determined. Recognition and Awards at lower than expected rates for IWD and IWTD: To be determined. Unavailability of applicant flow data to analyze participation rates for IWD and IWTDs in career development and promotions: Planned activities proceeding on schedule. Lower than expected conversion rates of eligible Schedule A employees: To be determined. Higher than expected separation rates for IWD: To be determined.

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.

Lower than Expected Participation Rates for IWD and IWTD: DHS will continue to examine and conduct barrier analysis in collaboration with OCHCO and Components. Until a barrier(s) has been identified, DHS will also continue to focus on the planned activities outlined above. Recognition and Awards at lower than expected rates for IWD and IWTD: DHS has modified the target date for completion to 09/30/2019. Unavailability of applicant flow data to analyze participation rates for IWD and IWTDs in career development and promotions: No planned activities have been completed; planned activities are anticipated to address the barriers. Lower than expected conversion rates of eligible Schedule A employees: DHS has modified the target date for completion to 09/30/2019. Higher than expected separation rates for IWD: DHS has modified the target date for completion to 01/30/2020.