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

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

Section I: Efforts to Reach Regulatory Goals

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

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

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

    b. Cluster GS-11 to SES (PWD)   Answer   No

Based on the utilization analysis of the DHS workforce by grade clusters, DHS has a trigger for the GS-1 to GS-10 cluster in the permanent workforce when compared to the 12 percent regulatory onboard goal. A slight increase was reported in FY 2020 in the GS-1 to GS-10 grade cluster representing 9.37 percent compared to FY 2019 participation rate of 8.99 percent. DHS continues to exceed the 12 percent goal in the GS-11 to SES grade cluster, representing 13.08 percent compared to 12.27 percent in FY 2019.

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*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 continues to have triggers for both grade clusters in the permanent workforce when compared to the 2 percent regulatory onboard goal. In FY 2020, PWTDs participated at a rate of 1.24 percent in the GS-1 to GS-10 and 1.26 percent in the GS-11 to SES grade clusters.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical Goal	--	12%		2%	
Grades GS-1 to GS-10	16835	3593	21.34	478	2.84
Grades GS-11 to SES	108768	14105	12.97	1373	1.26

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

Numerical hiring goals are established for individuals with disabilities, targeted disabilities, and Schedule A hires, which are formally announced on an annual basis from the DHS OCHCO to all DHS Components via the Human Capital Leadership Council (HCLC). The HCLC is comprised of the senior human capital officials in OCHCO, the DHS Components, and other lines of

business. 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, Diversity practitioners, and hiring officials. During FY 2020, DHS continued to maintain 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 during FY 2020. In FY 2020, 14.75 percent of all (permanent/temporary) new hires were PWDs, and 1.30 percent were PWTDs. When excluding law enforcement related and TSO positions, the percentage of PWTD new hires represented 1.77 percent, nearly meeting the 2 percent goal. In addition, Schedule A hires constituted 3.40 percent of all new hires in non-law enforcement related and non-TSO positions, exceeding the DHS goal for the second year in a row, representing a percent increase of 50 percent compared to FY 2019 (2.25 percent).

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

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. Additionally, at the department level, OCHCO's Strategic Recruitment Diversity and Inclusion (SRDI) team has assigned two employees to support disability recruitment, career development, and retention programs across DHS. All DHS Components have identified personnel to support the following programs: Selective Placement Program, Disability Employment Program, Reasonable Accommodation Program, Operation Warfighter Program, and Section 508 Program. Each Component maintains responsibility for servicing its workforce. Total Full Time Equivalent Employees (FTEs) are included in the counts provided in the following table.

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	
Architectural Barriers Act Compliance	53	1	0	Karl Johnson Executive Director
Processing applications from PWD and PWTD	100	10	28	Laura Davis Dept. Disability Employment Program Manager laura.davis@hq.dhs.gov
Answering questions from the public about hiring authorities that take disability into account	103	11	24	Laura Davis Departmental Disability Employment Program Manager laura.davis@hq.dhs.gov
Processing reasonable accommodation requests from applicants and employees	30	4	74	Laura Davis (Departmental) Darlene Avery (HQ)

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Section 508 Compliance	51	1	16	Cynthia Clinton-Brown Executive Director cynthia.clinton-brown@hq.dhs.gov
Special Emphasis Program for PWD and PWTD	10	1	103	Laura Davis Departmental 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.

<div align="center">Answer   Yes</div>

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 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.

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.

<div align="center">Answer   Yes</div>

Upon review of each Component's response to compliance indicators 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", some deficiencies were observed. CBP, FEMA, ICE, FLETC, and USCG reported certain deficiencies with the following Measures: B.4.a.1; B.4.a.2; B.4.a.5; b.4.a.7; B.4.a.8; B.4.a.9; and B.4.b. CRCL will continue to provide guidance and support to assist Components in addressing reported deficiencies. In support of this measure, CRCL encouraged all DHS Components to utilize the Accessibility Compliance Management System (ACMS) to manage and track reasonable accommodations during FY 2020. CRCL and Component level subject matter experts continued to collaborate with OAST on the development and overall architectural design of an enhanced Accessibility Compliance Management System (ACMS 2.0). ACMS 2.0, an enterprise-wide system, available to all Components, manages, tracks, and reports all reasonable accommodation requests, including those for PAS. After DHS deployed the new system in FY 2019, reports of system issues and additional enhancements were identified and addressed in FY 2019 continuing through FY 2020. OAST and CRCL established a new workflow process to address issues and requests for enhancements. System updates were routinely conducted. The new system has a built-in reporting capability to meet all reporting and record keeping requirements mandated by 29 C.F.R § 1614.203(d)(5) and Executive Order 13164.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]		
Objective	At the Department level, monitor Component activities and progress in correcting EEO program deficiencies. Take actions, such as sharing best practices, to assist Components in addressing deficiencies.		
Target Date	Sep 30, 2019		
Completion Date			
Planned Activities	*Target Date*	*Completion Date*	*Planned Activity*
	Jul 31, 2019		Data call to all Components for mid-year update on all Part G measures and progress made on deficiencies
	Jul 31, 2019		CRCL/DMS staff meet one-on-one with each Component EEO function and review program deficiencies, actions, accomplishments, and plans
	Dec 1, 2019		Data call to all Components for end-year Parts G, H and J, including progress made on deficiencies (Part H); Consolidate into Department Part G and compare to prior fiscal year Part G
Accomplishments	*Fiscal Year*	*Accomplishment*	
	2020	Since these are ongoing, annual activities, DHS updated the Modified dates to 2021 although all three activities were completed for the FY 2020 reporting year. The data call to all Components for the mid-year update on Part G measures was issued on 5/12/2020 and compiled by CRCL/DMS staff. CRCL/DMS staff conducted one-on-one meetings with each Component EEO function and review program deficiencies, actions, accomplishments, and plans. The data call to all Components for end-year Parts G, H, and J was issued and the Component Part G input was consolidated into this departmental MD-715 report (see Executive Summary).	
	2019	Since these are ongoing annual activities, DHS updated the Modified dates to 2020 although all three activities were completed for the FY 2019 reporting year. Issued data call to all Components for mid-year update on all Part G measures; tabulated results; presented results to all Components at CRCL/DMS Component Quarterly Meeting; facilitated discussion of how to address common unmet measures. Conducted one-on-one meetings with Components to review program deficiencies, actions, accomplishments, and plans. Issued data call to all Components for end-year Parts G and H, including progress made on deficiencies (Part H); Consolidate into Department Part G and compare to prior fiscal year Part G.	
	2018	Issued data call to all Components for mid-year update on all Part G measures; tabulated results; presented results to all Components at CRCL/DMS Component Quarterly Meeting; facilitated discussion of how to address common unmet measures. Conducted one-on-one meetings with Components to review program deficiencies, actions, accomplishments, and plans. Issued data call to all Components for end-year Parts G and H, including progress made on deficiencies (Part H); Consolidate into Department Part G and compare to prior fiscal year Part G.	

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.

Brief Description of Program Deficiency	B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]

Brief Description of Program Deficiency	B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]

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.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.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]

Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

In FY 2020, the Strategic Marketing, Outreach, and Recruitment Engagement (SMORE) enterprise system was launched for Department-wide use. Since SMORE's Go-Live on October 1, 2019, it has simplified the way OCHCO reports and analyzes recruitment activities. Over 19,000 Master Events have been imported into SMORE, allowing analysis to also be performed on historical data. The SMORE system is supplemented by two additional SharePoint sites (Recruiter's Portal and Joint Hiring Event Portal) which provides maximum data captured across the Department. SMORE Power BI reports provide live results and complex visualizations with the capability to drill down further into the data. There are three dynamic and complex main dashboards which

provide 20 unique dashboards documenting our recruitment and outreach efforts across the Department. The DHS Corporate Recruitment Council (CRC) brings together key recruiting personnel from across DHS. The Council develops a "Top 25" list annually of recruiting and outreach events that target diverse populations. These events include those focused on law enforcement, which represent approximately 40 percent of the positions at DHS. During FY 2020, the CRC developed process improvements/ enhancements for the SMORE, adjusted recruitment strategies as a result of COVID-19 and discussed research insights on how to attract females to our mission critical occupations. An updated memoranda of understanding (MOU) template has been developed by OCHCO and CRCL to expand the outreach and recruitment of students and recent graduates from institutions of higher education. The MOU will also be used to establish relationships with higher education associations and minority servicing institutions, focusing on DHS opportunities, including, but not limited to, internships, fellowships, temporary and permanent federal employment. DHS is committed to creating and maintaining a workplace culture that embraces inclusive diversity as a critical business imperative that cultivates a high-performing organization. DHS has both Department-wide and Component-level Employee Associations (EAs) that are recognized to advance inclusive diversity and improve communication between employees and management across the Department. An EA is an organization comprised of members who have a common set of interests and goals who partner with the agency to achieve mission-related and human capital goals. In FY 2020, the Department distributed the "DHS is Hiring" spread-the-word brochures to EAs to enhance outreach to their members and targeted constituents to bolster awareness and participation in the hiring initiative. Examples of DHS-wide EAs include the DHS Asian American and Pacific Islander Network; DHS Employee Network; DHS PRIDE; Homeland Security Employee Association; DHS Deaf and Hard of Hearing Association; and the Middle Eastern Law Enforcement Officers Association. DHS continues to use the Pathways Programs; the Federal Government's primary entrance point for students and recent graduates. In FY 2020, DHS hired 275 Pathways student interns, 181 recent graduates, and 15 Presidential Management Fellows, totaling 471 Pathways Programs participants. Of these, 40.7 percent identified as members of a minority racial or ethnic group, 54.1 percent were women, 6.5 percent were Individuals with Disabilities, and 2.1 percent were Individuals with Targeted Disabilities. Since FY 2018, DHS has had a goal for Schedule A Hires that states Schedule A hires should comprise 1.5 percent of all new hires within each grade level in non-law enforcement related and non-Transportation Security Officer (TSO) positions. In an annual IWD and IWTD Hiring Goal memo to the Department, DHS promotes the use of Schedule A Hiring Authority through the Workforce Recruitment Program (WRP) and the OPM Shared List of People with Disabilities (Bender List). In FY 2020, Schedule A hires comprised 3.4 percent of all new hires in non-law enforcement related and non-TSO positions, with an increase of 0.4 percent when compared to the 3.0 percent of Schedule A hires in FY 2019. Specifically, as it pertains to individuals with disabilities and targeted disabilities, DHS: • Attended over 36 recruiting events during FY 2019 in over 25 states to attract candidates who identified as a PWD/PWTD. • Participated in the EOP Career Expo for People with Disabilities in November 2019. DHS Recruiters, HR Staff, and Hiring Managers interacted with over 350 potential candidates with Schedule A eligibility and 30% or more Disabled Veterans covering Department-wide missions and available job opportunities. In addition to collecting resumes from potential candidates, several onsite interviews were conducted. Many candidates were encouraged to apply for current online job opportunities. • Participated in the Virtual Ability Job Fair in July 2020. DHS Recruiters interacted with 25 potential candidates with Schedule A eligibility. The Ability organization provided a database of resumes for DHS Components to review. DHS, along with other participants, faced technical challenges in this virtual environment. The Department will explore using a virtual platform that offers the ability to sponsor large-scale Department-wide recruiting events with representation and participation of its Operational Components and Headquarters offices and directorates. • DHS hosted two "DHS is Hiring" webinars in November 2019 and July 2020, with a targeted audience of individuals with disabilities and individuals with targeted disabilities. The webinars covered department- wide missions, DHS career opportunities, Schedule A, and 30% or more Disabled Veterans preference hiring authorities. There were also segments on effective resume writing and how to create a profile on OPM's USAJOBS. Both webinars had over 1,000 registrants, with 500 participants using the Adobe Connect platform with 300 participating via an audio conference bridge. • DHS provided a briefing on "Neurodiversity in the Workplace" during the Strategic Recruitment Diversity and Inclusion Council meeting to highlight the MITRE/Melwood program. This program offers support to qualified neurodivergent candidates for internship opportunities. As a result, DHS Federal Protective Service (FPS) is currently participating in the pilot program to recruit and hire neurodivergent interns. DHS CRCL and OCHCO SRDI supported FPS in identifying accommodation requirements for advance planning and coordination. • In support of the Workforce Recruitment Program, DHS conducted phone interviews with students from the National Technology Institute of the Deaf, for the third year in a row, resulting in the ranking and rating of potential WRP candidates for both private and public sector employment opportunities. • DHS continues to maintain strategic partnerships with national disability advocacy groups and provides Components with recruitment resources for individuals with disabilities/ individuals with targeted disabilities. DHS attended recruiting events at Gallaudet University, California State Northridge, and National Technical Institute for the Deaf. • Supported and promoted the Department of Defense Operation Warfighter Program.

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)) o TSA has its own distinct non-competitive appointment authority for hiring individuals with disabilities, that is comparable with the Schedule A Hiring Authority (HCM POLICY NO. 300-28), To increase and promote the use of these hiring authorities, goals are established annually. In FY 2020, DHS hired 281 individuals with disabilities utilizing the Schedule A Hiring Authority, representing 3.40 percent of new hires excluding Law Enforcement and Transportation Security Officer occupations, significantly exceeding the FY 2020 goal of 1.5 percent. Using the 30 Percent or More Disabled Veterans hiring authority, DHS hired an additional 599 individuals using authorities that take disability into account, representing 4.2 percent of all new hires.

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

Each DHS Component utilizes both the Schedule A appointing authority (or equivalent for TSA) 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 in efforts of drafting standard operating procedures (SOPs) until a policy can be considered. The SOP will focus on sound strategies and best practices for utilizing the Schedule A appointment authority for employment, retention, and career development opportunities. DHS plans to finalize, socialize and implement the final Department-wide SOP by 2021. Please refer to each Component's MD 715 report for its procedures on processing applicants under Schedule A and the 30 percent or More Disabled Veteran Authority.

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

Answer   Yes

DHS developed training for all hiring managers and human resources professionals entitled, "Employment of People with Disabilities: A Roadmap to Success." The training includes information on Schedule A hiring authority as well as Veterans hiring authorities with disability-related criteria. The training is mandatory and must be taken within sixty (60) days from onboarding and every two years thereafter. The Roadmap to Success training was updated during FY 2017 to include the provision of the Final Rule amending 29 C.F.R § 1614.203(d)(5), as well as other necessary revisions. DHS, CRCL awarded funding to develop the new curriculum which is scheduled to replace this training course by 2021. Each Component provides a variety of training covering disability employment and reasonable accommodations to its employees. Please refer to each Component's MD 715 report for more details.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

DHS Components continue to explore different avenues for reaching candidates with targeted disabilities. Feedback on targeted disability hiring and recruitment events continued to be captured within the SMORE, providing valuable information on the overall experience and success of each event, including attracting the right talent. This information also assists with benchmarking with similar activities providing a means to strengthen the Department's efforts to enhance outreach to applicants with disabilities and targeted disabilities. DHS also uses a consolidated disability organization listserv representing more than 550 organizations to conduct targeted recruiting. The Department's goal is to attract individuals with disabilities including those who are veterans. The listserv is maintained and updated on a regular basis as new organizations are identified, and partnerships are established. DHS used the listserv to promote participation in various recruitment activities and in Department-hosted webinars.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

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

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

During FY 2020, DHS hired 2,040 PWDs, representing 14.28 percent of all permanent hires, an increase from 10.97 percent of the hires reported in FY 2019. PWTD represented 1.20 percent of all permanent hires. When excluding law enforcement and transportation security officer (TSO) occupations, DHS met the 2 percent hiring goal for PWTD, representing 2.00 percent. Schedule A hires comprised 3.4% of all new hires in non-law enforcement and non-TSO positions, an increase of 0.4% compared to the 3.0% of Schedule A hires in FY 2019. Disability workforce data includes (1) employees who self-identify as having a disability, (2) employees appointed under Schedule A, and (3) 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	84419	3.45	0.00	1.71	0.00
% of Qualified Applicants	44497	4.16	0.00	1.95	0.00
% of New Hires	9504	5.00	0.00	0.70	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

A review of B6 New Hires by MCO, representing AFD from USA Staffing/Cognos and Monster Government Solutions and actual hires data from the National Finance Center via AXIS for all DHS Components was conducted. As a result, triggers existed for the following occupations out of the nine (9) DHS priority mission-critical occupations for PWD and PWTD: PWD: Two out of nine MCOs 1896 - Border Patrol Agent: 1.33 percent were Qualified compared to 0.75 percent for Selections 1811 - Criminal Investigator: 6.29 percent were Qualified compared to 2.26 percent for Selections PWTD: Seven out of nine MCOs 1802 - Compliance Inspection and Support: 1.29 percent were Qualified compared to .89 percent for Selections 1895 - Customs and Border Protection Officer: .51 percent were Qualified compared to .05 percent for Selections 1896 - Border Patrol Agent: .63 percent were Qualified compared to .08 percent for Selections 1811 - Criminal Investigator: 2.80 percent were Qualified compared to .38 percent for Selections 2210 - Information Technology Management: 3.34 percent were Qualified compared to 1.46 percent for Selections 0089 - Emergency Management Specialist: 4.92 percent were Qualified compared to 1.19 percent for Selections All the mission-critical occupations listed above, except for 2210 and 0089, have physical and or medical requirements. These physical and or medical requirements cause lower than expected selection rates for PWTD when compared to the qualified applicant pool. Note: Due to OPM restrictions on access to job applicant flow data, applicant flow data is only available for job announcements that are closed and fully audited. Because of this rule, certain MCO AFD was not available.

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	0	0.00	0.00	0.00	0.00
0089EMERGENCY MANAGEMENT	0	0.00	0.00	0.00	0.00
1801GEN INSPECTION, INVESTIGATIVE ENFORCEMENT, & COMPLIANCE	0	0.00	0.00	0.00	0.00
1802COMPLIANCE INSPECTION & SUPPORT	0	0.00	0.00	0.00	0.00
1811CRIMINAL INVESTIGATORS	0	0.00	0.00	0.00	0.00
1881CUSTOMS AND BORDER PROTECTION INTERDICTION	0	0.00	0.00	0.00	0.00
1895CUSTOMS & BORDER PROTECTION OFFICERS	0	0.00	0.00	0.00	0.00
1896BORDER PATROL AGENTS	0	0.00	0.00	0.00	0.00
2210INFORMATION TECHNOLOGY SPECIALISTS	0	0.00	0.00	0.00	0.00

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

　　　　a. Qualified Applicants for MCO (PWD)　　　　　　　　Answer　　N/A

　　　　b. Qualified Applicants for MCO (PWTD)　　　　　　　Answer　　N/A

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

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

　　　　a. Promotions for MCO (PWD)　　　　　　　　　　　Answer　　Yes

　　　　b. Promotions for MCO (PWTD)　　　　　　　　　　Answer　　Yes

A review of B6 Internal Competitive Promotions by MCO was conducted. The applicant flow data was derived from USA Staffing/ Cognos and Monster Government Solutions along with the actual hires data from the National Finance Center via AXIS for all DHS Components. Triggers exist for the following occupations for PWDs and PWTDs when comparing the qualified applicant pool to the number of selections for promotions: PWDs: Two out of Nine MCOs 0083 – Law Enforcement: Qualified 6.82 percent; Selections 5.88 percent 1802- Compliance Inspection and Support: Qualified 8.28 percent; Selections 4.67 percent PWTDs: Seven out of Nine MCOs 0083 – Law Enforcement: Qualified 4.55 percent; Selections 0.00 percent 0089 - Emergency Management Specialist: Qualified 6.07 percent; Selections 2.40 percent 1801 - General Inspection, Investigation & Compliance: Qualified 2.33 percent; Selections 1.98 percent 1802 - Compliance Inspection and Support: Qualified 4.93 percent; Selections 0.67 percent 1895 - Customs and Border Protection Officer: Qualified 0.84 percent; Selections 0.16 percent 1896 - Border Patrol Agent: Qualified .61 percent; Selections .19 percent 210 - Information Technology Management: Qualified 4.81 percent; Selections 1.65 percent

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

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

A. ADVANCEMENT PROGRAM PLAN

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

All managers and supervisors are encouraged to promote the career development of all employees, including individuals with disabilities and individuals with targeted disabilities. CRCL continued to promote opportunities through its Disability Employment Advisory Council. CRCL requested that each Component Disability Program Manager share and encourage its employees with disabilities to participate in career development and advancement programs. In FY 2020, CRCL launched the DHS Disability Mentoring Program Pilot. The program announcement and application process were advertised on DHS Connect, the Department's intranet site, and distributed across DHS Components. As a result, 36 employees, 18 mentor-mentee pairs (mentee/mentors), from across the department were matched to participate in the six-month pilot. CRCL successfully collaborated with other DHS offices and Components in the development and deployment of the pilot program. The DHS Disability Mentoring Program is led and managed by the CRCL Equal Employment Opportunity Division's Diversity Management Section.

B. CAREER DEVELOPMENT OPPORTUNITES

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

The Department continues to offer various ways for employees to further their educational goals. In FY 2020, 21 employees participated in the U.S. Department of Defense Senior Service School Master's Degree programs. DHS also nominates employees to attend the Center for Homeland Defense and Security (CHDS) Master's and Executive Leaders Programs. DHS routinely promotes the use of the U.S. Office of Personnel Management's Federal Academic Alliance which provides current Federal employees with the opportunity to pursue post-secondary education at reduced tuition rates. Federal employees can take advantage of this program at their own pace to pursue or enhance their higher academic education at 15 different colleges and universities. DHS employees have, or will have, access to training/career development courses by a variety of means: • DHS's Senior Executive Service Candidate Development Program (SES CDP), was advertised both internally and externally to DHS. Advertising for the SES CDP occurs via email, the DHS website, and other avenues of communication. DHS will continue its outreach efforts to help ensure a diverse applicant pool for this program. DHS is also developing an SES Outreach Plan that will outline strategies to increase diversity in the SES cadre. In FY 2021 and beyond, DHS will advertise the SES CDP through its Employee Associations and OCHCO's Strategic Recruitment, Diversity and Inclusion Council. • DHS, in partnership with SkillSoft, offers nearly 40,000 online learning resources that can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are aligned to support competencies, job roles, or blended learning offerings. • The DHS Leader Development Program establishes required and optional development activities throughout the year for new and seasoned leaders at all levels across DHS. DHS continues to use the Pathways Program the Federal government's primary entrance point for students and recent graduates. In FY 2020, DHS hired 275 Pathways student interns, 181 recent graduates, and 15 Presidential Management Fellows, totaling 471 Pathways participants. Of these, 40.7 percent identified as members of a racial minority or ethnic group, and 54.1

percent were women. Of these, 6.5 percent identified as PWDs and 2.1 percent were PWTDs. • The DHS Mentoring Program is a formal program that provides enriching experiences through reciprocal relationships and opportunities for personal and professional growth while sharing knowledge, leveraging skills, and cultivating talent. The DHS Mentoring Program is open to all DHS federal employees. The mentoring announcement is sent by the DHS Management Directorate to all DHS employees. Training is provided to mentor applicants. The types of mentoring offered include: Speed Mentoring, Flash Mentoring, Situational Mentoring, Reverse Mentoring, Group Mentoring, and Peer Mentoring. The program is evaluated with feedback provided on its successes and areas of improvement. In FY 2020, the DHS Mentoring programs consisted of 497 mentees. Of the participants, 6.2 percent self-identified as having a disability, with 2.3 percent self-identifying as having a targeted disability. • The newly established DHS Disability Mentoring program pilot launched in FY 2020 was developed to provide valuable career developmental opportunities for both mentors and mentees with disabilities. It also provides participants with the opportunity to learn from and network with colleagues across DHS. Participants are matched across the department, providing a forum to gain insight and perspective on the various career opportunities DHS has to offer. During FY 2020, CRCL selected 36 participants out of 47 applicants. Of the 36 mentee/mentor participants, 27.78 percent self-identified as having a disability, with 16.67 percent self-identifying as having a targeted disability. After further review, 94.44 percent of the mentee participants self-identified as having a disability, with 56 percent self-identifying as having a targeted disability. Mentor applicants were not required to self-identify as having a disability.

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 (%)
Detail Programs						
Coaching Programs						
Training Programs						
Internship Programs		275		6.5		2.1
Fellowship Programs		181		6.0		4.4
Mentoring Programs		515		11.46		4.47
Other Career Development Programs	538	45	2.79	0	.74	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, except for the SES CDP program, are not available at the Department level. DHS CRCL will continue to coordinate efforts with OCHCO and OPM to acquire access to applicant flow data as identified in the planned activities. DHS achieved full operational capability for its talent management system (referred to as the Performance and Learning Management System, or PALMS) at six of the nine DHS Components in August 2017. OCHCO exempted FEMA, TSA, and USCG from adopting PALMS. DHS continues to identify the solution set for follow-on capability, including reporting capability such as that required for MD-715. • DHS completed its collection of training course completion data from all Components in November 2019. In FY 2021, DHS will begin using this data with other data sets to determine its ability to produce the MD-715 report. • DHS will continue to identify qualifying career development programs and courses that support those programs. Using data from its talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes, DHS will continue to produce a report that complies with MD-715. • DHS will continue to include encouraging language in all career development programs to increase the participation of PWDs.

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 2020, AFD data was 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 PWDs to the 12 percent goal and PWTDs to the 2 percent goal, neither group participated at rates expected in the programs outlined above.

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

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Based on a review of MD-715 Table B9-1: Employee Recognition and Awards - Distribution by Disability, PWDs (IWDs) and PWTDs (IWTDs) are not receiving awards at the expected rates when compared to the corresponding inclusion rate of PWODs (self-reported as no disability) in three of the thirteen (13) categories, including: PWDs Benchmark Time-Off Awards 11 – 20 Hours PWDs Inclusion Rate: 15.47% IWODs Inclusion Rate: 19.60% Cash awards $100 – $500: PWDs Inclusion Rate: 25.46% IWODs Inclusion Rate: 38.71% Cash awards $1,000 – $1,999: PWDs Inclusion Rate: 28.50% IWODs Inclusion Rate: 35.82% PWTDs Benchmark Time-Off Awards 11 – 20 Hours PWTDs Inclusion Rate: 12.24% IWODs Inclusion Rate: 19.60% Cash awards $100 – $500: PWTDs Inclusion Rate: 32.66% IWODs Inclusion Rate: 38.71% Cash awards $1,000 – $1,999 PWTDs Inclusion Rate: 24.80% IWODs Inclusion Rate: 35.82%

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	20309	13.51	9.10	18.07	12.97
Time-Off Awards 1 - 10 Hours: Total Hours	160576	101.99	72.83	135.59	97.96
Time-Off Awards 1 - 10 Hours: Average Hours	7.91	0.03	0.01	0.31	0.00
Time-Off Awards 11 - 20 hours: Awards Given	36457	15.47	19.60	12.24	15.86
Time-Off Awards 11 - 20 Hours: Total Hours	547795	241.06	293.77	196.73	246.37
Time-Off Awards 11 - 20 Hours: Average Hours	15.03	0.07	0.01	0.66	0.00
Time-Off Awards 21 - 30 hours: Awards Given	16645	9.06	9.08	7.28	9.27
Time-Off Awards 21 - 30 Hours: Total Hours	409376.5	223.47	223.27	176.85	229.06
Time-Off Awards 21 - 30 Hours: Average Hours	24.59	0.11	0.02	1.00	0.00
Time-Off Awards 31 - 40 hours: Awards Given	6906	9.35	2.86	11.91	9.04
Time-Off Awards 31 - 40 Hours: Total Hours	252560	352.38	102.96	453.29	340.29

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 31 - 40 Hours: Average Hours	36.57	0.17	0.02	1.57	0.00
Time-Off Awards 41 or more Hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: $501 - $999: Awards Given	30535	19.80	16.09	18.81	19.92
Cash Awards: $501 - $999: Total Amount	21748760.82	13765.04	11524.09	12664.11	13896.95
Cash Awards: $501 - $999: Average Amount	712.26	3.07	0.46	27.83	0.11
Cash Awards: $1000 - $1999: Awards Given	63291	28.50	35.82	24.80	28.94
Cash Awards: $1000 - $1999: Total Amount	97780423.57	40348.50	55999.31	35140.00	40972.58
Cash Awards: $1000 - $1999: Average Amount	1544.93	6.26	1.01	58.57	0.00
Cash Awards: $2000 - $2999: Awards Given	18137	10.93	9.82	11.58	10.85
Cash Awards: $2000 - $2999: Total Amount	43094532.46	26149.49	23293.59	27913.92	25938.08
Cash Awards: $2000 - $2999: Average Amount	2376.06	10.59	1.53	99.69	-0.09
Cash Awards: $3000 - $3999: Awards Given	9302	5.61	5.06	6.82	5.46
Cash Awards: $3000 - $3999: Total Amount	32098994.04	19377.30	17463.88	23755.52	18852.71
Cash Awards: $3000 - $3999: Average Amount	3450.76	15.28	2.23	143.97	-0.14
Cash Awards: $4000 - $4999: Awards Given	1704	1.45	0.86	1.28	1.47
Cash Awards: $4000 - $4999: Total Amount	7502497.97	6461.65	3752.86	5845.21	6535.51
Cash Awards: $4000 - $4999: Average Amount	4402.87	19.70	2.84	188.56	-0.53
Cash Awards: $5000 or more: Awards Given	563	0.51	0.27	0.54	0.51
Cash Awards: $5000 or more: Total Amount	3220333.12	2806.95	1565.32	2860.78	2800.50
Cash Awards: $5000 or more: Average Amount	5719.95	24.41	3.74	220.06	0.97

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 B9-1: Employee Recognition and Awards - Distribution by Disability, PWDs and PWTDs are

exceeding the inclusion rate benchmark for quality step increases (QSIs).

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	5586	2.95	2.97	2.60	2.99

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 2020.

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   No

        b. Grade GS-15

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

            ii. Internal Selections (PWD)   Answer   No

        c. Grade GS-14

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

            ii. Internal Selections (PWD)   Answer   No

        d. Grade GS-13

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

            ii. Internal Selections (PWD)   Answer   No

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

Grade: SES: 0.00% N/A GS-15: 4.54% N/A GS-14: 4.38% N/A GS-13: 3.46% N/A No triggers were identified for selections of PWDs within the senior grade levels. PWDs exceeded participation across all senior grades as identified below: Selections by Senior Grade: Qualified Internal Applicants by Senior Grade: SES: 10.00% 0.00% GS-15: 5.93% 4.54% GS-14: 5.21% 4.38% GS-13: 6.19% 3.46%

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   Yes

   b. Grade GS-15

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

       ii. Internal Selections (PWTD)   Answer   Yes

   c. Grade GS-14

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

       ii. Internal Selections (PWTD)   Answer   Yes

   d. Grade GS-13

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

       ii. Internal Selections (PWTD)   Answer   No

Relevant applicant pool data is not available. Internal announcements often have an area of consideration that is broader than the announcing agency. There may be a government-wide effort to expand the applicant pool and recruit the best talent into the agency. As a result, the current DHS workforce or a subset of it (employees in an MCO, employees at next lower grade level, and so forth) is not a relevant applicant pool. Identifying which current DHS employees would qualify for a job series they are not currently in is a difficult undertaking. Human Capital offices do not adjudicate applicant qualifications until an applicant applies for a specific position. The applicant may qualify based on experience obtained prior to entry into their current job series or DHS. DHS has not attempted to develop estimated relevant applicant pools to date. Consistent with prior practice, DHS will not attempt to tabulate relevant applicant pools for this reporting cycle. Qualified Internal Applicants by Senior Grade: Relevant Applicant Pool by Senior Grade: SES: 0.00% N/A GS-15: 2.09% N/A GS-14: 1.81% N/A GS-13: 1.62% N/A Slight triggers were identified for selections of PWTDs at the GS-15, GS-14, and GS-13 levels when comparing the participation rate of selections to the percentage of qualified internal applicants by senior grade levels. PWTDs exceeded participation at the SES level as identified below: Selections by Senior Grade: Qualified Internal Applicants by Senior Grade: SES: 0.91% 0.00% GS-15: 1.19% 2.09% GS-14: 1.09% 1.81% GS-13: 1.20% 1.62%

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

Based on a review of MD 715 B7-1 Senior Grade Level (New Hires), DHS identified a trigger for PWD new hires at the SES level when compared to the qualified applicant pool. Hires Qualified Applicant Pool New Hires to SES 7.41% 8.93% New Hires to GS-15 16.17% 6.68% New Hires to GS-14 9.94% 7.08% New Hires to GS-13 15.21% 7.56%

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   Yes

    c. New Hires to GS-14 (PWTD)   Answer   Yes

    d. New Hires to GS-13 (PWTD)   Answer   Yes

Based on a review of MD 715 B7-1 Senior Grade Level (New Hires), DHS identified triggers for PWTD at all senior grade levels (SES, GS-15, GS-14, and GS-13). Hires Qualified Applicant Pool New Hires to SES 0.00% 3.77% New Hires to GS-15 2.40% 3.19% New Hires to GS-14 0.93% 3.49% New Hires to GS-13 2.29% 3.20%

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   Yes

    c. Supervisors

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

        ii. Internal Selections (PWD)   Answer   Yes

Relevant applicant pool data is not available. Internal announcements often have an area of consideration that is broader than the announcing agency. There may be a government-wide effort to expand the applicant pool and recruit the best talent into the agency. As a result, the current DHS workforce or a subset of it (employees in an MCO, employees at next lower grade level, and so forth) is not a relevant applicant pool. Identifying which current DHS employees would qualify for a job series they are not currently in is a difficult undertaking. Human Capital offices do not adjudicate applicant qualifications until an applicant applies for a specific position. The applicant may qualify based on experience obtained prior to entry into their current job series or DHS. DHS has not attempted to develop estimated relevant applicant pools to date. Consistent with prior practice, DHS will not attempt to tabulate relevant applicant pools for this reporting cycle. When reviewing the internal selections and comparing to the 12 percent goal as an alternative comparator, triggers were identified for PWDs in the Managers (GS-13 – GS-14) and Supervisors (First-Level Grade 12 and Below positions) categories. No trigger was identified for Executives (SES – GS-15) positions. PWD Executive Selections:

14.49% PWD Goal: 12.00% PWD Manager Selections: 10.64% PWD Goal: 12.00% PWD Supervisor Selections: 12.28% PWD Goal: 12.00%

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. 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 (PWTD)   Answer   N/A

        ii. Internal Selections (PWTD)   Answer   Yes

    b. Managers

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

        ii. Internal Selections (PWTD)   Answer   Yes

    c. Supervisors

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

        ii. Internal Selections (PWTD)   Answer   Yes

Relevant applicant pool data is not available. Internal announcements often have an area of consideration that is broader than the announcing agency. There may be a government-wide effort to expand the applicant pool and recruit the best talent into the agency. As a result, the current DHS workforce or a subset of it (employees in an MCO, employees at next lower grade level, and so forth) is not a relevant applicant pool. Identifying which current DHS employees would qualify for a job series they are not currently in is a difficult undertaking. Human Capital offices do not adjudicate applicant qualifications until an applicant applies for a specific position. The applicant may qualify based on experience obtained prior to entry into their current job series or DHS. DHS has not attempted to develop estimated relevant applicant pools to date. Consistent with prior practice, DHS will not attempt to tabulate relevant applicant pools for this reporting cycle. When reviewing the internal selections and comparing to the 2 percent goal as an alternative comparator, triggers were identified for PWTDs in all categories. PWTDs Executive Selections: 0.72% PWTDs Goal: 2% PWTDs Manager Selections: 0.66% PWTDs Goal: 2% PWTDs Supervisor Selections: 1.16% PWTDs Goal: 2%

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

      a. New Hires for Executives (PWD)   Answer   No

      b. New Hires for Managers (PWD)   Answer   No

      c. New Hires for Supervisors (PWD)   Answer   No

When reviewing the selections for PWDs compared to the qualified applicant pool benchmark, no triggers were identified. PWDs Executive Selections: 26.27% Qualified External Applicants: 6.91% PWDs Manager Selections: 31.15% Qualified External Applicants: 7.86% PWDs Supervisor Selections: 12.14% Qualified External Applicants: 9.09%

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   Yes

b. New Hires for Managers (PWTD)	Answer	Yes
c. New Hires for Supervisors (PWTD)	Answer	Yes

When reviewing the selections for PWTDs compared to the qualified applicant pool benchmark, triggers exist in all categories. PWTDs Executive Selections: 0.85% Qualified External Applicants: 3.27% PWTDs Manager Selections: 2.19% Qualified External Applicants: 3.13% PWTDs Supervisor Selections: 1.03% Qualified External Applicants: 4.96%

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.

<div align="right">Answer   No</div>

During FY 2020, DHS converted a total of 170 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 45.21 percent conversion rate. Of those converted, 146 were converted non-competitively after two years of satisfactory service, 19 converted to career or career conditional before two years of service, with five converted by other means. As a result of quarterly tracking and monitoring, DHS Components continued efforts to sustain and experience incremental increases in conversions for the last four years.

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

a. Voluntary Separations (PWD)	Answer	Yes
b. Involuntary Separations (PWD)	Answer	Yes

Based on a review of MD-715 Table B1: Total Workforce (Employee Losses) - Distribution by Disability, in DHS, PWDs are exceeding the inclusion rate benchmark for both voluntary and involuntary separations. Voluntary Separations: PWDs Inclusion Rate: 5.20% IWODs Inclusion Rate: 4.59% Involuntary Separations: PWDs Inclusion Rate: 3.48% IWODs Inclusion Rate: 1.94% For reporting purposes, resignation and retirement are counted as voluntary separations and reduction in force, removal, and other separations are counted as involuntary separations.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	10	0.00	0.01
Permanent Workforce: Removal	1373	0.73	0.64
Permanent Workforce: Resignation	5104	2.11	2.44
Permanent Workforce: Retirement	4170	2.58	1.88
Permanent Workforce: Other Separations	2941	2.40	1.25
Permanent Workforce: Total Separations	13598	7.82	6.21

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

a. Voluntary Separations (PWTD)	Answer	Yes

      b.Involuntary Separations (PWTD)   Answer   Yes

Based on a review of MD-715 Table B14: Separations by Type of Separation - Distribution by Disability, in DHS, PWTDs are exceeding the inclusion rate benchmark for both voluntary and involuntary separations. Voluntary Separations: PWTDs Inclusion Rate: 6.78% IWODs Inclusion Rate: 4.59% Involuntary Separations PWTDs Inclusion Rate: 3.10% IWODs Inclusion Rate: 1.94% For reporting purposes, resignations and retirement are counted as voluntary separations. Reductions in force, removal, and other separations are counted as involuntary separations.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	10	0.00	0.00
Permanent Workforce: Removal	1373	0.83	0.64
Permanent Workforce: Resignation	5104	1.92	2.41
Permanent Workforce: Retirement	4170	4.03	1.94
Permanent Workforce: Other Separations	2941	1.89	1.38
Permanent Workforce: Total Separations	13598	8.67	6.37

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

During FY 2020, the Department's DHS Exit Survey Program continued to transition. The program's transition involved coordination and consideration of both content and administration changes, and migration from one platform to another. The DHS Exit Survey results were based on exiting employees from HQ, OIG, USCG, FLETC, FEMA and USCIS. All other Components (USSS, TSA, CBP, ICE and CISA), continued to maintain their separate Component-specific exit survey programs during FY 2020. Components with separate exit survey programs provided results to the Department for coordination and reporting purposes. The consolidated FY 2020 DHS Exit Survey yielded a 25.53 percent response rate. Of the 2,840 employees separating from service, 725 took the exit survey. Aside from retirement, representing 226 respondents, the top three reasons separating non-SES employees listed for leaving DHS were: Advancement Opportunities (10.44 percent); Supervisor/Management (10.16 percent) and Personal/ Family Related (9.2 percent). Based on available data from the DHS Exit Survey, those self-reporting as PWD were 86, or 11.81 percent, of the total survey respondents. The top three categories cited as the reason for leaving were: Supervisor/Management (12.79 percent); Personal/Family Related (10.47 percent) and Health Related (9.30 percent). During FY 2020, an additional 34 respondents self-reported as an PWTD. This represented 4.67 percent of all respondents. Of the 35 respondents, excluding those who selected retirement as a primary factor for leaving, 14 responses were provided including: • Health Related (4) 11.76% • Supervisor/Management (3) 8.82% • Job Duties/Responsibilities (3) 8.82% DHS will continue to monitor these areas to identify any future trends. To assist in monitoring trends and possible triggers, DHS recommends that along with its decentralized exit survey program efforts, each Component (USSS, TSA, CBP, ICE and CISA) conduct an individualized assessment to identify any correlation to potential barriers for separating PWDs/PWTDs. While both versions of the DHS Exit Survey included responses to the newly established disability program related questions, it was insufficient to draw any conclusion. Data will be used as a baseline for future analysis.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

The DHS public facing website (https://www.dhs.gov/accessibility) notice explains Section 508 requirements to ensure Information and Communication Technology (ICT) is accessible to individuals with disabilities, including members of the public. A section on reporting accessibility issues and/or filing a formal complaint is also included. Specifically, the website provides: If you have feedback, questions, or concerns relating to the accessibility of any content that interferes with your ability to access the information on the Department of Homeland Security's website, please contact Website Issues for assistance. If you believe that the Information

and Communication Technology (ICT) used by the Department of Homeland Security does not comply with Section 508 of the Rehabilitation Act, you may file a 508 complaint by contacting Accessibility@hq.dhs.gov. To enable us to respond in a manner most helpful to you, please indicate the nature of your accessibility problem, the preferred format in which to receive the material, the web address (URL) of the material with which you are having difficulty, and your contact information. If you wish to file a civil rights and civil liberties complaint, please use the CRCL complaint submission process. If you believe that a physical facility that is designed, built, altered, or leased with Federal funds by the Department of Homeland Security does not comply with the Architectural Barriers Act (ABA), refer to the U.S. Access Board's website under ABA Enforcement – File a Complaint. Similarly, the DHS intranet site (http://dhsconnect.dhs.gov/pages/accessibility.aspx) provides the following statement: Accessibility The Department of Homeland Security is committed to providing accessible Information and Communication Technology (ICT) to individuals with disabilities, including members of the public and federal employees, by meeting or exceeding the requirements of Section 508 of the Rehabilitation Act of 1973. In addition, the Department is also committed to ensuring accessibility of our buildings and facilities as required by the Architectural Barriers Act, 42 U.S.C. 4151 through 4157. Section 508 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794d) Section 508 of the Rehabilitation Act of 1973, as amended requires agencies, during the procurement, development, maintenance, or use of ICT, to ensure that individuals with disabilities have access to and use of ICT information and data comparable to the access and use afforded to individuals without disabilities (i.e., "ICT accessibility"), unless an undue burden would be imposed on the agency. More information on Section 508 and the technical standards can be found at www.section508.gov. If you have feedback, questions, or concerns relating to the accessibility of any content that interferes with your ability to access the information on the Department of Homeland Security's website, please contact Website Issues for assistance. If you believe that the Information and Communication Technology (ICT) used by the Department of Homeland Security does not comply with Section 508 of the Rehabilitation Act, you may file a 508 complaint by contacting Accessibility@hq.dhs.gov. To enable us to respond in a manner most helpful to you, please indicate the nature of your accessibility problem, the preferred format in which to receive the material, the web address (URL) of the material with which you are having difficulty, and your contact information. Additional information regarding compliance with 508 requirements is available at the DHS Office of Accessible Systems and Technology. Architectural Barriers Act of 1968 (42 U.S.C. §§ 4151--57) The Architectural Barriers Act (ABA) requires access to facilities that are designed, built, altered, or leased with Federal funds. The Access Board is the federal agency responsible for enforcing the ABA. The Access Board's accessibility standards are available on their website at www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards, and information about filing a complaint may be found at www.access-board.gov/aba-enforcement/file-a-complaint.

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

The DHS public facing website (https://www.dhs.gov/accessibility) notice explains that if an individual believes that a physical facility designed, built, altered, or leased with Federal funds by the Department of Homeland Security does not comply with the Architectural Barriers Act (ABA), refer to the U.S. Access Board's website under ABA Enforcement – File a Complaint. Similarly, the DHS intranet site (http://dhsconnect.dhs.gov/pages/accessibility.aspx) provides the following statement: Architectural Barriers Act of 1968 (42 U.S.C. § 4151--57) The Architectural Barriers Act (ABA) requires access to facilities that are designed, built, altered, or leased with Federal funds. The U.S. Access Board is the federal agency responsible for enforcing the ABA. The Access Board's accessibility standards are available on their website at www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards, and information about filing a complaint may be found at www.access-board.gov/aba-enforcement/file-a-complaint.

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

During FY 2019, CRCL finalized the department-wide standard operating procedures for processing complaints of inaccessible ICT as required by Section 508 of the Rehabilitation Act. The new process and associated form are expected to be fully developed and implemented by the end of FY 2021, representing a slight delay. CRCL is in the process of completing the Paperwork Reduction Act process required before it deploys the new DHS Section 508 Technology Accessibility Issue Report Form.

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 2020, the overall average time frame for processing initial requests for reasonable accommodations was approximately 37.30 days. This does not include the average processing days for USCIS, FEMA, and TSA. The average number of days reported by DHS Components for FY 2020 are as follows: CBP: 56.72 Days USCIS: Unavailable – See Component report HQ: 31 Days FEMA: Unavailable – See Component report FLETC: 16.9 Days ICE: 38 Days TSA: Unavailable – See Component report USCG: 12.6 Days USSS: 7 Days

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

DHS is committed to providing effective reasonable accommodations to employees and applicants with disabilities. The overall average processing time for reasonable accommodation requests during FY 2020 was 37.30 days, reducing the average processing days by ten. Note: The average number of processing days does not include USCIS, TSA, or FEMA, as their data was unavailable at the time of reporting. During FY 2020, all DHS Components continued to provide reasonable accommodation training to managers and supervisors regularly. Consistent with the new requirements outlined in EEOC's Final Rule implementing revisions to 29 C.F.R. § 1614.203(d)(5), DHS and its Components continue efforts to finalize and implement their revised reasonable accommodation and personal assistance service procedures. In support of DHS's reasonable accommodation program, CRCL and Component-level subject matter experts continue to collaborate with OAST on the development and overall architectural design of an enhanced Accessibility Compliance Management System. The enhanced system will monitor trends and manage, track, and report on all reasonable accommodation requests, including requests for PAS. DHS deployed the new system during FY 2019. As a result, coordinated efforts continue to address unexpected system issues and enhancements. The new system will have a built-in reporting capability to produce all reporting and record keeping requirements consistent with 29 C.F.R. § 1614.203(d)(5) and Executive Order 13164. During FY 2020, CRCL awarded funding to OPM's USA Learning to develop a new training course to replace the DHS Employment of People with Disabilities: A Roadmap to Success. This training was the first of its kind in the Federal sector was soon followed by OPM's version A Roadmap to Success: Hiring, Retaining, and Including People with Disabilities. The new course is scheduled to be fully implemented and deployed on all DHS learning management systems by the end of FY 2021. The course, mandatory for all supervisors, hiring officials, human capital and EEO professionals, must be completed within sixty (60) days of onboarding and every two years after appointment. CRCL continued efforts to implement its revised reasonable accommodation procedures incorporating the provision of personal assistant services as an affirmative action obligation. The revised procedures are in the official DHS Directives System review process. The Department expects the review and implementation to be completed by mid-year, FY 2021. When final, DHS will submit its revised reasonable accommodation procedures to the EEOC. To educate its workforce about PAS, DHS will develop a communication strategy to socialize the RA/ PAS procedures to the workforce and the public, posting the procedures on its internal and external websites. Finally, DHS continued to partner with the Department of Defense (DoD), Computer/Electronic Accommodation Program (CAP) and the Job Accommodation Network to provide assistive technology accommodation solutions and expert consulting on disability accommodation solutions. During FY 2020, CAP provided 330 accommodations to 121 employees and conducted needs assessments for 13 employees. This resulted in a $91,258.13 cost savings to DHS. Due to a change in program scope, effective FY 2021, CAP will no longer provide assistive technology or adaptive equipment to non-DOD agencies.

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 its CRCL Connect Page, advising of its responsibility 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." A link to the EEOC guidance on providing PAS was also added. This Department issued guidance is now posted to DHS's public (internet) webpage at the following URL: https://www.dhs.gov/reasonable-accommodations-dhs. In FY 2018, DHS revised its existing Reasonable Accommodation procedures to include the provision of PAS. The initial draft was submitted to the EEOC for review as required and sent to its raprocedures@eeoc.gov mailbox on September 28, 2018. Feedback and recommendations received from the EEOC were incorporated. The revised procedures are in the official DHS Directives System with the review to be completed by mid- FY 2021. When final, DHS will submit its revised reasonable accommodation procedures to the EEOC. To educate its workforce about PAS, DHS will develop a communication strategy to socialize the RA/PAS procedures to the workforce and the public, posting the procedures on its internal and external websites.

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 2020, DHS had a lower percentage of PWDs who filed a formal EEO Complaint (19.1 percent) alleging harassment, as compared to the government-wide average of 20.82 percent. In FY 2020, DHS had 34 settlement agreements and eight findings alleging harassment based on disability. Corrective measures taken include: • Post notice • Conduct EEO training • Back Pay • Pay attorney's fees • Pay compensatory damages • Provide list of funded positions • Restoration of leave • Pay lost overtime hours • Remove documentation of discipline

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 2020, DHS had a lower percentage of PWDs who filed a formal EEO Complaint (9.81 percent) alleging failure to provide a reasonable accommodation compared to the government-wide average of 14.02 percent. DHS had 31 settlement agreements, a slight increase compared to FY 2019, with two findings of failure to provide a reasonable accommodation based on disability during FY 2020. Corrective measures taken included: • Post notice • Conduct EEO training • Expungement of termination • Placement in a position • Consider disciplinary action against the supervisor • Provide opportunity to submit a request for attorney's fees

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

Source of the Trigger:	Workforce Data (if so identify the table)
Specific Workforce Data Table:	Workforce Data Table - B1
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?	Trigger # 1: Lower than expected participation for individuals with disability (PWD) and targeted disabilities (PWTDs) when compared to the regulatory goals of 12 percent for PWD and 2 percent for PWTD in grade clusters GS-1 – GS-10 and GS-11 – SES.

STATEMENT OF BARRIER GROUPS:	*Barrier Group*
	People with Disabilities
	People with Targeted Disabilities

Barrier Analysis Process Completed?:	N
Barrier(s) Identified?:	N

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.	**Barrier Name**	**Description of Policy, Procedure, or Practice**
	Not Identified	N/A

			Objective(s) and Dates for EEO Plan		

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
10/01/2017	09/30/2021	Yes	10/30/2020		Increase workforce participation rates of PWDs and PWTDs at all grade levels.

	Responsible Official(s)	

Title	Name	Standards Address The Plan?
Departmental Disability Employment Program Manager	Laura Davis	Yes
Supervisory D&I Advisor, OCHCO	Ginny Berry	Yes
Executive Director	Cynthia Cliinton-Brown, OAST	Yes

	Planned Activities Toward Completion of Objective			

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/30/2017	Issue Annual Hiring Goals for PWDs and PWTDs and socialize throughout DHS.	Yes		12/27/2017

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

Report of Accomplishments	
Fiscal Year	**Accomplishment**
2018	Hiring Goals: During FY 2018, DHS set a 12 percent hiring goal for Persons with Disabilities (PWDs) at all grade levels; a 2 percent hiring goal for Persons with Targeted Disabilities (PWTDs) at all grade levels, excluding law enforcement and transportation security officer occupations; and a 1.5 percent hiring goal for Schedule A hires excluding law enforcement and transportation security officer occupations. As a result of these goals, 10.4 percent of new hires were PWDs and 1.7 percent were PWTDs in non-law enforcement and non-TSO positions. While the Department did not meet the new hire goals listed above in these two areas, it should be noted that DHS ended FY 2018 with PWDs representing 10.5 percent of the total workforce and PWTDs representing 2.4 percent, both increases from FY 2017 (9.9 percent and 2.1 percent, respectively). In addition, Schedule A hires constituted 1.6 percent of all new hires in non-law enforcement related and non-TSO positions, exceeding the goal and increasing by 35 percent from FY 2017. To support and expand DHS's outreach and recruitment, SRDI, in coordination with CRCL, began compiling a listserv of all disability organizations that will be maintained and distributed on an annual basis to all DHS Components. The listserv will be finalized in FY 2019 for distribution and will include disability organizations such as America Job Centers, Veteran's Vocational Rehabilitation and Employment Program, Centers for Independent Living and Employment Network providers. Disability Training: The Roadmap to Success training was updated during FY 2017 and FY 2018 to include the provision of amended 29 C.F.R 1614. § 1614.203(d)(5), as well as other necessary revisions and updated resources. DHS plans to revise this training course by FY 2020. Mid-Year Reporting Requirements: CRCL issued a revised mid-year reporting requirement to all DHS Components to assist with monitoring and tracking progress in establishing a Model EEO Program. The revised reporting format was modeled after the revised Part G Agency Self-Assessment, essential element program measures and trigger identification based on Part J Special Program Plan for the Recruitment, Hiring, Advancement and Retention of Persons with Disabilities. CRCL reviewed and combined all Component responses then reported on EEO programs in a composite document providing additional technical guidance where necessary. Revise DHS Standard Language on All Vacancy Announcements: CRCL initiated coordination efforts with OCHCO Policy and Programs with the recommendation of adding standard language to vacancy announcements to encourage persons with disabilities to apply. During FY 2018, DHS updated template language that is still under review by OPM. DHS CRCL in partnership with OCHCO will continue efforts to ensure effective implementation by the end of FY 2019. Revise Reasonable Accommodation and Personal Assistance Services Procedures: During FY 2018, CRCL drafted revised reasonable accommodation procedures to include procedures for processing personal assistance services consistent with the new obligations outlined in Section 501 of the Rehabilitation Act. 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. Develop and post notice of rights under Section 508 and the Architectural Barriers Act on the internal and external websites. During FY 2018, DHS updated its web page, e.g., internal connect page (http://dhsconnect.dhs.gov/pages/accessibility.aspx), for both accessibility and consistency to include a description of rights and how to file a complaint under Section 508. Implement and post FY 2017 Affirmative Action Report and FY 2018 Plan As required, DHS posted its FY 2017 Affirmative Action Report and FY 2018 Plan on DHS' public facing website at the following location: www.dhs.gov/reports-office-civil-rights-and-civil-liberties. CRCL continues

Report of Accomplishments	
Fiscal Year	**Accomplishment**
	to collaborate with OCHCO and DHS Components to ensure effective implementation on a regular basis
2019	Disability Training: DHS continued its efforts to redevelop and expand its DHS Roadmap to Success training module. Modifications to the training include recent changes in disability employment law, Section 508 compliance and the addition of Personal Assistance Services as a regulatory requirement in Title 29, Part 1614. CRCL developed and submitted a statement of objectives to support a request for proposal to OPM's USALearning office. Based on the feedback received from OPM including the total estimated cost to redesign the training, CRCL decided to explore other options. As a result, CRCL consulted with OCHCO's Strategic Learning Development and Engagement's (SLDE) Learning Technology and Innovation (LTI) Division. DHS is certain that the services provided in-house by the SLDE-LTI will support CRCL's training development and implementation needs. The goal remains to deploy the revised DHS Roadmap to Success module before the end of FY 2020 with a roll-out in early FY 2021. Revise DHS Standard Language on All Vacancy Announcements: As recommended by CRCL, in an alert, guidance to the DHS Human Capital Leadership Council (including all Component Chief Human Capital Officers and others) was issued on April 18, 2019, regarding updated "mandatory language for Job Opportunity Announcements – Disability Recruitment." The alert provided the required language that should be included in all competitive and excepted service job opportunity announcements. Specifically, the language encourages persons with disabilities to apply. This activity is closed. Revise Reasonable Accommodation and Personal Assistance Services Procedures: In furtherance of DHS efforts to implement approved revised reasonable accommodation procedures to include procedures for processing personal assistance services consistent with the new obligations outlined in amended 29 C.F.R 1614. § 1614.203(d)(5), CRCL continued to coordinate reviews during FY 2019. The Department's draft revision to Instruction Number 259-01-001, which implements DHS procedures for facilitating reasonable accommodation and personal assistant service requests is currently in the official DHS Directives System review process. CRCL has also conducted reviews of Component-level revised procedures and provided edits and comments prior to submission to EEOC for approval. As a result, DHS (Departmental), U.S. Coast Guard, the Transportation Security Administration, and U.S. Secret Service, Federal Law Enforcement Training Center, and U.S. Citizenship and Immigration Service have all submitted either draft or final revised procedures to EEOC for review and approval pursuant to Executive Order 13164, during the reporting period. CRCL will continue to monitor and track the status and progress with the remaining Components in meeting this requirement. DHS's procedures require all updated reasonable accommodation procedures to be submitted to CRCL for review prior to submission to EEOC. Develop a bi-annual Mission Critical Occupations report to monitor participation of PWDs and PWTDs: The revised 2.0 data tables now include a detailed report of participation rates by ERI/G and Disability (A/B-6) for MCOs that will serve as our framework for continued analysis and monitoring. DHS will use a similar format to mirror the 2.0 data table format (excluding the applicant flow data) to continue its efforts in monitoring DHS Priority MCOs during FY 2020 and beyond on a bi-annual basis. This report will be shared with Components as a resource and sample framework to support Component level monitoring efforts.

Report of Accomplishments	
Fiscal Year	**Accomplishment**
2020	Disability Training: DHS revised and expanded its DHS Roadmap to Success training module. CRCL secured funding and contracted with OPM USALearning to develop an e-learning course on creating, promoting, and sustaining a model disability employment program. Powertrain will support the development of a new disability training module to replace the DHS Roadmap to Success training. This training will be mandatory for all supervisors, managers, Human Capital and EEO professionals. The period of performance is from August 2020 to August 2021, with full implementation on all DHS learning management systems by September 30, 2021. Revise Reasonable Accommodation and Personal Assistance Services Procedures: In furtherance of DHS efforts to implement approved revised reasonable accommodation procedures to include procedures for processing personal assistance services consistent with the new obligations outlined in amended 29 C.F.R. § 1614.203(d)(5), CRCL continued to coordinate and adjudicate Office of General Counsel's comments and reviews during FY 2020. The Department's draft revision to Instruction Number 259-01-001, which implements DHS procedures for facilitating reasonable accommodation and personal assistant services requests continues in the official DHS Directives System review process. CRCL anticipates fully approved and vetted procedures to be finalized by the end of second quarter in FY 21. Upon finalization, DHS will resubmit revisions to EEOC as required and will develop a communication strategy to socialize the RA/PAS procedures to the workforce and public, posting on both internal and external websites. 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: The target date for this planned activity has been modified. DHS will seek additional guidance and explore best practices from OPM and other agencies on options available to support this effort during FY 2021. Until this is accomplished, OCHCO will: • Ensure that employees with disabilities are made aware of various leadership development programs and have an equal opportunity to compete for all programs, including managerial, executive, and other career-enhancing programs and initiatives. • Participate in outreach/recruitment events targeted to individuals with disabilities such as Career Expo for People with Disabilities for various positions across DHS Components. • Conduct continuous resume mining from OPM's Agency Talent Portal (ATP) utilizing Schedule A hiring authority to hire individuals with disabilities and targeted disabilities. Develop a bi-annual report to monitor Components' progress toward increasing the participation of PWDs and PWTDs in Mission Critical Occupations: Modified completion date to June 30, 2021. The mission critical occupations by disability report will be shared with Components as a resource and sample framework to support Component level monitoring efforts of the participation of PWDs and PWTDs, representing, onboard, hires, and separations within the DHS workforce.

Source of the Trigger:	Workforce Data (if so identify the table)
Specific Workforce Data Table:	Workforce Data Table - B9
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?	Trigger # 2: 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 Process Completed?:	N
Barrier(s) Identified?:	N

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.	**Barrier Name**	**Description of Policy, Procedure, or Practice**

Objective(s) and Dates for EEO Plan

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
09/30/2018	09/30/2020	Yes	09/30/2020		Collaborate with OCHCO to review recognition and awards policy, practices and procedures, and determine next steps.

Responsible Official(s)

Title	Name	Standards Address The Plan?
CRCL	Laura Davis	Yes
OCHCO	Ginny Berry	No

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2018	Collaborate with OCHCO to review recognition and awards policy, practices and procedures, and determine next steps.	Yes	09/30/2020	
09/30/2021	Expand review of recognition and award practices across DHS.	Yes		

Report of Accomplishments	
Fiscal Year	**Accomplishment**
2018	During FY 2018 CRCL identified initial data sources and policies and procedures at the departmental level to begin review. As indicated above, data sources reviewed include workforce data tables, complaint data, Federal Employment Viewpoint Survey responses, and the DHS Exit Interview Survey report. 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
2019	The DHS Directives Instruction Manual describes the processes, procedures and requirements for preparing, reviewing, approving and issuing Directives (policies) and Instructions (procedures). The Manual also provides guidance on other implementing documents, such as manuals, guides, handbooks, reference books, standard operating procedures (SOPs), through the Department of Homeland Security (DHS) Directives System, as defined in DHS Directive 112-01. It also outlines the process by which Directives, Instructions, and/ or other Implementing Documents issued under the Directives System are reviewed within two years, to determine if the Directive or Instruction should be (1) Revised; (2) Consolidated; (3) Canceled; or (4) Certified Current (no changes are required and reissued as is with a "current as of" date listed). The Directives Manager is responsible for affirmatively indicating to the DHS Directives Manager what appropriate action is necessary to maintain the Directive or Instruction upon receipt of the notice from the DHS Directives Manager, which is coordinated every two-years. Based on this outlining procedure, all policies and procedures identified are reviewed every two years by the Office of the Chief Human Capital Officer. To date, no potential barriers have been identified. CRCL will continue to coordinate and collaborate with OCHCO on a regular basis to propose recommendations to ensure perceived or actual barriers that may be caused by DHS award policies or associated procedures are addressed.
2020	Based on a completed review of the department's policies and procedures previously identified and listed below, CRCL did not find any actual or perceived barriers. CRCL will continue to review data and resources both at the Department and Component levels to include "practices" as part of its individual with disabilities barrier analysis to be conducted in FY 2021. Policies and Procedures Reviewed: 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

Source of the Trigger:	Workforce Data (if so identify the table)
Specific Workforce Data Table:	Workforce Data Table - B6
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?	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 (USAStaffing/Cognos, Monster Government Solutions, and Learning Management Systems). (Tables: B6, B7, B8)
STATEMENT OF BARRIER GROUPS:	*Barrier Group* People with Disabilities People with Targeted Disabilities
Barrier Analysis Process Completed?:	Y
Barrier(s) Identified?:	N

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.	**Barrier Name**	**Description of Policy, Procedure, or Practice**

Objective(s) and Dates for EEO Plan					
Date Initiated	**Target Date**	**Sufficient Funding / Staffing?**	**Date Modified**	**Date Completed**	**Objective Description**
10/01/2018	09/30/2020	Yes	09/30/2020	09/30/2020	Acquire accurate and reliable applicant flow data to analyze, monitor and inform program enhancements to increase representation of PWDs and PWTDs in all programs and hires.

Responsible Official(s)		
Title	**Name**	**Standards Address The Plan?**
Statistican	Greg Beatty, CRCL	Yes
Data Analyst	OCHCO/SRDI	No
Data Analyst	OCHCO Reports and Analysis	No

	Planned Activities Toward Completion of Objective			
Target Date	**Planned Activities**	**Sufficient Staffing & Funding?**	**Modified Date**	**Completion Date**
09/30/2020	All Activities moved to Part H. This trigger has been closed. 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		09/30/2020
09/30/2019	All Activities have been moved to Part H: This trigger has been closed. Coordinate with OCHCO to develop AFD framework for the SES Career Development Program, Pathways Program, and mentoring programs at the DHS level.	Yes	09/30/2020	09/30/2020

	Report of Accomplishments
Fiscal Year	**Accomplishment**
2018	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. 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. Coordinate with OCHCO to develop AFD framework for the SES Career Development Program, Pathways Program, and mentoring programs at the DHS level. 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. USAStaffing was used to track applications, qualification, referral, and selection. The Department was able to obtain full applicant flow data for the SES CDP cohort announced in FY 2018. The SES CDP program staff provided data on participants. DHS will identify qualifying career development programs throughout the Department and the 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 that complies with MD-715. DHS achieved full operational capability for 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. 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 with diversity data 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.

Report of Accomplishments	
Fiscal Year	**Accomplishment**
2019	Develop AFD framework for the SES Career Development Program, Pathways Program, and mentoring program. During FY 2019, CRCL was able to acquire applicant flow data for both the SES Career Development Program and the newly established DHS Women in Law Enforcement Mentoring Program and will continue to monitor. Efforts to identify a process for acquiring and analyzing DHS Pathways Program AFD are still in progress. AFD for these programs are now available for review on data tables B7 and B8.
2020	Per an EEOC technical assistance feedback letter dated October 19, 2020 this trigger is closed and will be addressed in Part H as a program deficiency.

Source of the Trigger:	Other
Specific Workforce Data Table:	Workforce Data Table - B1
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?	Trigger # 4: Lower than expected conversion rates of eligible Schedule A employees into competitive service.
STATEMENT OF BARRIER GROUPS:	*Barrier Group* People with Disabilities People with Targeted Disabilities
Barrier Analysis Process Completed?:	N
Barrier(s) Identified?:	N

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.	**Barrier Name**	**Description of Policy, Procedure, or Practice**

Objective(s) and Dates for EEO Plan

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
09/30/2018	09/30/2021	Yes	09/30/2020		Increase conversion rates of eligible Schedule A employees.

Responsible Official(s)

Title	Name	Standards Address The Plan?
Departmental Disability Employment Program Manager	Laura Davis	Yes
OCHCO	N/A	No

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2018	Review and analyze current policies and procedures for excepted service appointments.	Yes		09/30/2018
01/30/2018	Monitoring Schedule A Conversions on a quarterly basis.	Yes		12/12/2018

	Planned Activities Toward Completion of Objective			
Target Date	**Planned Activities**	**Sufficient Staffing & Funding?**	**Modified Date**	**Completion Date**
09/30/2018	Coordinate efforts with OCHCO to develop DHS Schedule A guidance.	Yes	09/30/2021	

	Report of Accomplishments
Fiscal Year	**Accomplishment**
2018	During FY 2018, DHS converted a total of 157 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 55.28 percent conversion rate. Of those converted, 138 were converted non-competitively after two years of satisfactory service, 15 converted to career or career conditional before two years of service, and four were converted by other means. Overall DHS experienced an increase in conversions when compared to 101, or 53 percent during FY 2017. Review and analyze current policies and procedures for excepted service appointments. CRCL, in coordination with OCHCO/SRDI, began reviewing existing policies and procedures at the Department level during FY 2018. As a result, we identified several excepted service policies, and found that procedures for Schedule A, 5 C.F.R. § 213.3102(u), for hiring people with severe physical disabilities, psychiatric disabilities, and intellectual disabilities, are not included. Monitoring Schedule A Conversions on a quarterly basis. 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: • Total Eligible • Total Converted 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 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. This activity is complete. CRCL will continue to provide reports and monitor on a quarterly basis as a standard practice. Coordinate efforts with OCHCO to develop DHS Schedule A policy and procedures. 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.

Report of Accomplishments	
Fiscal Year	**Accomplishment**
2019	During FY 2019, DHS converted a total of 159 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 55.28 percent conversion rate. Of those converted, 129 were converted non-competitively after two years of satisfactory service, 27 converted to career or career conditional before two years of service, and three were converted by other means. Overall, DHS experienced an increase in conversions when compared to the 157 during FY 2018. In support of this effort, CRCL continues to monitor Schedule A conversions on a quarterly basis and shares Component-level reports for appropriate action. The reports provide a summary review of Schedule A employees by: • Total Schedule A Workforce • Total Eligible • Total Converted 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 Coordinate efforts with OCHCO to develop DHS Schedule guidance. Modified planned activity description to change efforts from developing policy and procedures to developing Schedule A guidance and to update target date for completion until 9/30/2020. CRCL and OCHCO are continuing these efforts to implement guidance with sound strategies and best practices for utilizing the Schedule A appointment authority for employment, retention, and career development opportunities. DHS plans to socialize and implement the final guidance by 2021. In support of this effort, CRCL developed a DHS Schedule A Factsheet. The factsheet is a high-level overview of the Schedule A Hiring Authority and provides prospective candidates with disabilities with an overview on applying for positions within DHS utilizing Schedule A, as well as a list of DHS Selective Placement Program Coordinators. Additionally, during FY 2019, DHS hosted a webinar on recruiting and hiring individuals with disabilities and targeted disabilities on Tuesday, July 30, 2019. Over 30 supervisors, hiring managers, recruiters, and human resources specialists participated to increase awareness of this topic. A post-webinar survey indicated 81 percent of the participants said they increased knowledge of Schedule A direct hiring authority from (34 percent prior to the webinar) and 58 percent of participants indicated they increased knowledge of the Bender program (17 percent prior to the webinar).

Report of Accomplishments	
Fiscal Year	**Accomplishment**
2020	During FY 2020, DHS converted a total of 170 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 45.21 percent conversion rate and an increase compared to 11 conversions in FY 2019. Of those converted, 146 were converted non-competitively after two years of satisfactory service; 19 converted to career or career conditional before two years of service, and five were converted by other means. As a result of quarterly tracking and monitoring, DHS Components continued efforts to sustain and experience incremental increases in Schedule A conversions for the last four years. To support increased use of Schedule A conversions, CRCL continues to monitor Schedule A conversions on a quarterly basis then share Component-level prepared reports for appropriate action. This report continues to be an effective tool for increasing coordination and tracking of conversions by offering a summary review of Schedule A employee eligibility status. Coordinate efforts with OCHCO to develop DHS Schedule A guidance. Due to unforeseen delays, efforts to develop and deploy DHS Schedule A Guidance were slightly delayed. OCHCO SRDI drafted a DHS Schedule A standard operating procedures document. The draft was forwarded to CRCL for review in November 2020. The target date for this activity has been modified to 06/30/2021 to provide additional time for review and coordination. Additionally, all DHS hiring officials (managers/supervisors) and human capital professionals are required to complete the People with Disabilities: A Roadmap to Success course within 60 days of appointment and then every two years thereafter. The Roadmap training is a comprehensive course on disability employment including the use of special hiring non-competitive authorities such as Schedule A and 30% or More Disabled Veteran appointments. As previously mentioned, because this training is a vital to support DHS' affirmative action program for individuals with disabilities and targeted disabilities, CRCL is currently in the process of developing a new training module with updated content consistent with current laws, regulations, initiatives and Executive Orders.

Source of the Trigger:	Workforce Data (if so identify the table)
Specific Workforce Data Table:	Workforce Data Table - B1
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?	Trigger # 5: Higher than expected separation rates for individuals with disabilities.
STATEMENT OF BARRIER GROUPS:	*Barrier Group* People with Disabilities People with Targeted Disabilities
Barrier Analysis Process Completed?:	N
Barrier(s) Identified?:	N
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.	**Barrier Name** **Description of Policy, Procedure, or Practice**

Objective(s) and Dates for EEO Plan					
Date Initiated	**Target Date**	**Sufficient Funding / Staffing?**	**Date Modified**	**Date Completed**	**Objective Description**
09/30/2017	09/14/2018	Yes	09/30/2020		Increase retention rates of individuals with disabilities and targeted disabilities.

Responsible Official(s)		
Title	**Name**	**Standards Address The Plan?**
Departmental Disability Employment Program Manager	Laura Davis	Yes
OCHCO	N/A	No

Planned Activities Toward Completion of Objective				
Target Date	**Planned Activities**	**Sufficient Staffing & Funding?**	**Modified Date**	**Completion Date**
01/30/2018	Review and analyze exit surveys to identify barriers to retention.	Yes	01/30/2021	
01/30/2018	Monitor separations on a quarterly basis by disability distribution	Yes		10/16/2018

Planned Activities Toward Completion of Objective				
Target Date	**Planned Activities**	**Sufficient Staffing & Funding?**	**Modified Date**	**Completion Date**
06/30/2018	Collaborate with OCHCO to explore the feasibility of implementing new retention programs specifically for PWDs and PWTDs.	Yes	09/30/2020	
09/30/2021	Conduct study on reasonable accommodation requests and procedures for delayed and denied accommodations to identify potential correlations to high separations.	Yes		

Report of Accomplishments	
Fiscal Year	**Accomplishment**
2019	Review and analyze exit surveys to identify barriers to retention. Modified target date due to the transitional period being in FY 2019. As a result, two additional Components have implemented Component specific exit surveys, further decentralizing the exit survey program within DHS. Additional efforts during FY 2019 included adding three additional disability-related questions to the DHS Survey. The same questions were shared with those Components who administer their own exit surveys. As part of the coordinated efforts with CRCL and OCHCO, questions now include: 1. DHS proactively supports efforts to improve the recruitment, hiring, advancement, and retention of individuals with disabilities. Matrix scale: Strongly Disagree Disagree Neither Agree or Disagree Agree Strongly Agree Recruitment Hiring Advancement Retention Followed by an optional open-ended comment box 2. DHS takes appropriate steps to ensure accessibility (technology and facility) requirements are met for qualified individuals with disabilities. Matrix scale: Strongly Disagree Disagree Neither Agree or Disagree Agree Strongly Agree Technology Facility Followed by an optional open-ended comment box 3. DHS takes appropriate steps to ensure reasonable accommodation and/or Personal Assistance Services are provided to qualified individuals with disabilities. Strongly Disagree Disagree Neither Agree or Disagree Agree Strongly Agree Reasonable Accommodations Personal Assistance Services Followed by an optional open-ended comment box Explore feasibility of implementing new retention programs specifically for PWDs and PWTDs. CRCL developed a plan to implement a DHS Disability Mentoring Program. Current plans are to implement a six-month program pilot during FY 2020, that will be modeled upon the CRCL DHS Women in Law Enforcement Mentoring Program launched in 2019. CRCL continues to promote the DHS Headquarters Mentoring program and all other career development programs including the recently launched Supervisory Leadership Bridges Self Development Program, which is open to employees with a minimum of one-year employment in DHS and who are in the GS-11 – GS-13 grade levels in the 1801, 1811, 0132, 0301, 0343, and 2210 occupational series. This program is an innovative approach to providing employees across the Department with a flexible developmental path that targets important aspects of supervisory leadership. This program addresses a curated set of essential leadership competencies and integrates virtual learning resources and experiential developmental activities to support affirmative employment obligations.

Report of Accomplishments	
Fiscal Year	**Accomplishment**
2018	Upon review PWDs continue to separate voluntarily and involuntarily at a higher rate when compared to employees without disabilities. The overall percentage of separations for PWDs increased from 10.05 percent in FY 2017 to 11.67 percent in FY 2018. Similarly, PWTDs experienced an increase for involuntary separations from 1.36 percent in FY 2017 to 2.11 percent in FY 2018, while voluntary separations for PWTDs decreased from 1.62 percent in FY 2017 to 1.51 percent in FY 2018. Review and analyze exit surveys to identify barriers to retention. CRCL reviewed and analyzed data from the FY 2018 exit survey. Data revealed approximately 18 percent of all employees voluntarily separating indicated their primary reason for leaving resulting in 1,506 responses. Of those responses, 215 or 14.2 percent of the respondents reported having a disability. Of the respondents who indicated they had a disability, the top three reasons for leaving other than Retirement, Moving to Another DHS Component, or Other were the same for respondents without disabilities, including: Supervision/Management – 11.63 percent Advancement Opportunities – 11.63 percent Personal/Family Related – 8.84 percent CRCL also noted, when comparing leaving based on health-related reasons, respondents with disabilities indicated health-related reasons as the primary reason 5.58 percent of the time compared to 1.82 percent for respondents without disabilities. In September 2018, DHS OCHCO convened an exit survey working group due to the low participation rates overall. The working group led by the DHS Engagement Team Lead, Chief Learning and Engagement Office, OCHCO consists of representatives from all DHS Components including representatives from CRCL. The initial goal of the working group was to review current DHS Exit Survey and Component Exit Surveys and provide recommended changes to the DHS survey that will improve participation and usefulness of data. The working group was tasked to also review off-boarding practices related to the exit survey in order to determine best practices for improving participation. CRCL representatives will ensure consideration of disability-related questions and seek their inclusion in the final submission of established core questions. The working group plans to achieve the goals outlined above and begin implementation by April 2019. 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. Monitor separations on a quarterly basis by disability distribution. CRCL developed a quarterly dashboard to monitor workforce demographics including separations by disability. CRCL will continue to monitor separations on a quarterly basis as a standard practice. Explore feasibility of implementing new retention programs specifically for PWDs and PWTDs. CRCL through coordinated efforts with OCHCO/SRDI will continue to identify strategies for increasing participation of employees with disabilities in existing DHS mentoring programs and career development programs. During FY 2018, CRCL requested that all Components advertise and encourage individuals with disabilities to consider applying to the DHS Headquarters Mentoring program and all other career development programs already in place throughout the Department to support our affirmative employment obligations.

Report of Accomplishments	
Fiscal Year	**Accomplishment**
2020	Review and analyze exit surveys to identify barriers to retention. Modified target date due to ongoing transitions during FY 2020. As a result, the DHS exit survey platform migrated from a SharePoint platform to a survey tool (SurveyMonkey) to better manage and track responses. Additionally, more Components have moved on to Component specific exit survey processes, further decentralizing the exit survey program within DHS. DHS Department-wide Exit Survey participating Components as of September 30, 2020 includes: • DHS HQ (Includes S&T, OS, and I&A) • OIG • USCG • FLETC • FEMA • USCIS Components using separate exit survey tools now includes: • USSS • TSA • CBP • ICE • CISA As of FY 2020, DHS-wide exit survey results now include specific data on the newly established disability program questions. DHS will use the FY 2020 responses to these questions as a baseline for future analysis.

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

Trigger # 1: Nothing to Report Trigger # 2: N/A – DHS began planned activities during FY 2018 and concluded that additional time is necessary to effectively conduct a thorough review. Trigger # 3: Planned activities proceeding on schedule. Trigger # 4: N/A – DHS began planned activities during FY 2018 and concluded that additional time is necessary to effectively conduct a thorough review. Trigger # 5: Exit Surveys – Low response rate and reliable data. CRCL will continue to serve on the working group and provide recommendations and technical guidance.

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

Trigger # 1: To be determined Trigger # 2: To be determined Trigger # 3: No planned activities have been completed; proceeding on schedule. Trigger # 4: To be determined Trigger # 5: 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.

Trigger # 1: DHS will continue to examine and conduct barrier analysis in collaboration with OCHCO and Components. Until a barrier(s) has been identified, DHS will continue to focus on the completion of the planned activities outlined above. Trigger # 2: DHS has modified the target date for completion to 09/30/2020. Trigger # 3: No planned activities completed; planned activities are anticipated to address the barriers. Trigger # 4: DHS has modified the target date for completion to 09/30/2020. Trigger # 5: DHS has modified the target date for completion to 01/30/2020.