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

Fiscal Year 2017

Homeland
Security

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Parts A-D – Agency Identifying Information

For period covering October 1, 2016, to September 30, 2017.

PART A	1. **Agency**	1. **Department of Homeland Security**	
Department or Agency Identifying Information	1.a. 2nd level reporting component		
	1.b. 3rd level reporting component		
	1.c. 4th level reporting component		
	2. Address	2. **245 Murray Lane, SW, Bldg. 410, MS 0191**	
	3. City, State, Zip Code	3. **Washington, District of Columbia, 20528**	
	4. CPDF Code 5. FIPS code(s)	4. **HS**	5. **7000**
PART B	1. Enter total number of permanent full-time and part-time employees	1. **183,966**	
Total Employment	2. Enter total number of temporary employees	2. **15,720**	
	3. Enter total number employees paid from non-appropriated funds	3. **1,420**	
	4. **TOTAL EMPLOYMENT [add lines B 1 through 3]**	4. **201,106**	
PART C	1. Head of Agency Official Title	1. **Kirstjen M. Nielsen, Secretary**	
Agency Official(s) Responsible for Oversight of EEO Program(s)	2. Agency Head Designee	2. **Cameron Quinn, Officer for Civil Rights and Civil Liberties (CRCL)**	
	3. Principal EEO Director/Official	3. **Veronica Venture, Deputy Officer for CRCL, and Director for Equal Employment Opportunity and Diversity**	
	4. Title VII Affirmative EEO Program Official	4. **Elaine McKinney, Director, Diversity Management Section (DMS), CRCL**	
	5. Section 501 Affirmative Action Program Official	5. **Laura Davis, Equal Employment Manager, DMS, CRCL**	
	6. Complaint Processing Program Manager	6. **Chrystal Young, Director, Complaints Management and Adjudication Section (CMAS), CRCL**	
	7. EEO Staff Statistician	7. **Greg Beatty, DMS, CRCL**	
	8. Special Emphasis Program Manager (SEPM)	8. **Michelle McGriff, Equal Employment Manager, DMS, CRCL**	
	9. Special Emphasis Program Manager (SEPM)	9. **Conchetta Belgrave, Equal Employment Manager, DMS, CRCL**	
	10. Equal Employment Opportunity Specialist	10. **Sara Fernandez, Equal Employment Opportunity Specialist, DMS, CRCL**	

PART D	**Subordinate Component and Location (City/State)**	**CPDF and FIPS codes**	
List of Subordinate Components Covered in This Report	**U.S. Customs and Border Protection** Washington, District of Columbia	TR 93	15
	U.S. Citizenship and Immigration Services Washington, District of Columbia	TR 93	89
	U.S. Coast Guard Washington, District of Columbia	TR 93	17
	Federal Emergency Management Agency Washington, District of Columbia	TR 93	22
	Federal Law Enforcement Training Centers Glynco, Georgia	TR 93	23
	U.S. Immigration and Customs Enforcement Washington, District of Columbia.	TR 93	16
	U.S. Secret Service Washington, District of Columbia	TR 93	60
	Transportation Security Administration Arlington, Virginia	TR 93	35
	Headquarters - Office of the Secretary Washington, District of Columbia	TR 93	11
	Headquarters - Office of the Inspector General Washington, District of Columbia	TR 93	20
	Headquarters – Management Directorate Washington, District of Columbia	TR 93	50 & 51
	Headquarters - Science & Technology Directorate Washington, District of Columbia	TR 93	30

EEOC FORMS and Documents Included With This Report

- **Executive Summary [FORM 715-01 PART E]:**
  - Brief paragraph describing the agency's mission and mission-related functions

  - Summary of results of agency's annual self-assessment against MD-715 "Essential Elements"

  - Workforce trend analysis including comparisons to CLF and RCLF

  - Summary of EEO Plan objectives with goal of eliminating identified barriers or correct program deficiencies

- **Statement of Establishment of Continuing Equal Employment Opportunity Programs [FORM 715-01 PART F]**

- **Optional Annual Self-Assessment Checklist Against Essential Elements [FORM 715-01PART G]**

- **EEO Plan To Attain the Essential Elements of a Model EEO Program [FORM 715-01PART H] for each programmatic essential element requiring improvement**

- **EEO Plan To Eliminate Identified Barrier [FORM 715-01 PART I] for each identified barrier**

- **Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities [FORM 715-01 PART J]**

- **Copies of relevant EEO Policy Statement(s) and/or excerpts from revisions made to EEO Policy Statements**

- **Summary of EEO Plan action items implemented or accomplished**

- **Workforce Data Tables**

- **Organizational Chart**

- **Copy of Facility Accessibility Survey results as necessary to support EEO Action Plan for building renovation projects**

- **Copy of data from 462 Report as necessary to support action items related to Complaint Processing Program deficiencies, ADR effectiveness, or other compliance issues**

Part E - Executive Summary

Introduction

This Equal Employment Opportunity Program Status Report for Fiscal Year 2017 (FY 2017) outlines the status of the U.S. Department of Homeland Security's (DHS) Equal Employment Opportunity (EEO) Program activities undertaken pursuant to its EEO program responsibilities under Title VII of the Civil Rights Act of 1964. This report also describes DHS activities undertaken pursuant to its affirmative action obligations under the Rehabilitation Act of 1973, and as required by the U.S. Equal Employment Opportunity Commission's (EEOC) Management Directive 715.

This report highlights DHS's accomplishments in establishing and maintaining a model program by promoting equal employment opportunity for all of its employees and applicants. The report also provides the FY 2018 plan to address any programmatic deficiencies which were identified during the course of the year. In addition to this DHS Management Directive 715 report, each DHS Component submits its own report to the EEOC. Directorates and Headquarters program reports have been amassed and included in this report.

The U.S. Department of Homeland Security

The mission of DHS is: *"With honor and integrity, we will safeguard the American people, our homeland, and our values."* There are five related homeland security missions: 1) Preventing Terrorism and Enhancing Security; 2) Securing and Managing Our Borders; 3) Enforcing and Administering Our Immigration Laws; 4) Safeguarding and Securing Cyberspace; and 5) Ensuring Resilience to Disasters. In addition, DHS specifically focuses on maturing the homeland security enterprise. Since its formation, DHS has coordinated the transition of multiple agencies and programs into a single, integrated Department focused on protecting the American people and the homeland.

The Office for Civil Rights and Civil Liberties

The Office for Civil Rights and Civil Liberties (CRCL) supports the DHS mission to secure the nation while preserving individual liberty, fairness, and equality under the law. CRCL is responsible for overseeing the integration of civil rights and civil liberties into all DHS activities. CRCL accomplishes this by: advising DHS leadership and state and local partners of ways to promote respect for civil rights and civil liberties in policy creation and implementation; informing individuals and communities whose civil rights and civil liberties may be affected by DHS policies and activities about policies and avenues of redress; promoting appropriate attention within DHS to concerns and experiences of these individuals or communities; investigating and issuing recommendations regarding civil rights and civil liberties complaints filed by the public regarding DHS policies or activities, or actions taken by DHS personnel; and leading DHS's EEO programs and promoting workforce diversity and merit system principles. Responsible for this last mission area, CRCL's EEO and Diversity Division (EEOD) includes the following organizational units: Diversity Management Section (DMS); EEO Complaints Management and Adjudication Section (CMAS); Alternative Dispute Resolution (ADR) Section; DHS-Headquarters EEO Office (HQ EEO); and HQ Anti-Harassment Unit (AHU).

Program Elements

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

    A. Demonstrated commitment from agency leadership;

    B. Integration of EEO into the agency's strategic mission;

    C. Management and program accountability;

    D. Proactive prevention of unlawful discrimination;

    E. Efficiency; and

    F. Responsiveness and legal compliance.

The EEOC has established specific measures for each of the six elements of a model EEO program. Each DHS Component reports to the EEOC as to whether each of the 122 specified measures is *met* or *unmet*. Each of DHS's nine Components reports on the 122 measures for a total of 1,098 reports by DHS. DHS increased its overall rate of compliance with the EEOC measures from 92.6 percent in FY 2016 to 93.9 percent in FY 2017, despite a drop in met measures for Essential Element A: *Demonstrated Commitment from Agency Leadership*, from 97.1 percent in FY 2016 to 95.9 percent in FY 2017. The decrease in measures for Element A was due to several DHS Components' failure to issue an EEO policy statement after the arrival of a new agency head in FY 2017, while some Components still had Acting heads, and were therefore unable to issue the required policy statement.

The scorecard below shows the percentage of measures met by all DHS Components for FY 2016 and FY 2017. Notably, four of the six essential elements show either 100 percent compliance or significant improvement. DHS Components continue to improve and are poised in FY 2018 to continue improvement. For example, FEMA has multiple Part H sections that are scheduled for completion in FY 2018.

Model EEO Program Scorecard

	Measures	FY2016 % Met	FY2017 % Met
Essential Element A: Demonstrated Commitment from Agency Leadership	171	97.1%	95.9%
Essential Element B: Integration of EEO into the Agency's Strategic Mission	288	93.1%	93.4%
Essential Element C: Management and Program Accountability	90	80.0%	85.6%
Essential Element D: Proactive Prevention of Unlawful Discrimination	90	80.0%	88.9%
Essential Element E: Efficiency	288	93.1%	93.8%
Essential Element F: Responsiveness and Legal Compliance	171	100.0%	100.0%
Total	1,098	92.6%	93.9%

Essential Element A – Demonstrated Commitment from Agency Leadership

• In the spring of 2014, Alejandro Mayorkas, then DHS Deputy Secretary, established the Employee Engagement Steering Committee (EESC), a representative body of employees from across DHS, to address issues of greatest importance to DHS employees. In FY 2015, the Office of the Chief Human Capital Officer (OCHCO), with input from the EESC, developed an Employee Engagement Action Plan (Plan) for DHS. The major focus areas of the Plan are: (1) selecting and empowering high performing leaders; (2) developing excellent leaders at all levels; and (3) enhancing two-way communication and inclusion, utilizing labor-management forums, diversity and inclusion councils, and ideation platforms. DHS Components developed their individual action plans. Components shared data and action plans with CRCL. In FY 2016, OCHCO, in partnership with EESC, focused on two key areas: communication and leadership. In FY 2017, the EESC continued its monthly meetings chaired by the Under Secretary for Management. Through the EESC, DHS recognized and rewarded excellence, enhanced communication, and increased leadership accountability, awareness, and empowerment related to employee engagement. Results from the 2017 Federal Employee Viewpoint Survey indicated that DHS has shown notable improvement in the area of employee engagement, the most of any Cabinet-level agency.

Veronica Venture, CRCL Deputy Officer, served as a principal on the Interagency Working Group on Women and Girls in Science, Technology, Engineering, and Mathematics (Interagency Working Group). CRCL staff actively participated in the monthly Interagency Working Group meetings led by the U.S. Department of Energy. The Interagency Working Group worked to address the distinctive concerns of women and girls, including those persons of color and those with disabilities in Science, Technology, Engineering, and Mathematics.

Consistent with the focus on the advancement of women in nontraditional career fields, CRCL previously conducted a DHS-wide study on women in law enforcement. The study's findings and recommendations were circulated throughout DHS Components and operating divisions. The report included observations and recommendations from women in law enforcement across DHS, identified perceived barriers to equal employment opportunity and diversity, provided recommendations and strategies to achieve a model workplace, and highlighted best practices from within DHS and from other federal law enforcement agencies. Because some of the recommendations related directly to the Federal Women's Program, the recommendations were implemented via Special Emphasis Programs at the Components, particularly during Women's History Month. These programs highlighted some of the challenges that women in non-traditional occupations, including law enforcement, have faced and how women have managed the challenges.

- CRCL's Director for Equal Employment Opportunity and Diversity:

  o Empowered DMS staff to continue their strategic collaboration efforts with the DHS Human Capital Data Analytics Division to enhance a comprehensive MD-715 Data Table Dashboard in the Analytics Intelligence System (AXIS), the DHS-wide human resources data analytics tool. DMS will continue to work with the AXIS team in FY 2018 to assess the feasibility of a DHS-wide MD-715 reporting tool that meets the new requirements. DMS is also working with the DHS EEO Directors Council to develop a common workforce data analytics tool for *ad hoc* workforce data reporting.

  o To ensure coordination, effectiveness, and efficiency in Departmental and Component EEO and civil rights programs, developed and deployed barrier analysis training to special emphasis program managers with MD-715 reporting and data management responsibilities. The completion of Phase I of the barrier analysis training supported the activities and measurable actions defined under the DHS EEO Directors Council Strategic Plan, FY 2016 – FY 2020.

  o Collaborated with DHS Pride (the DHS-recognized employee association focusing on workforce issues of importance to the LGBT community), the Department of Justice, and DHS Components in the sponsorship of the "*Intersect of Race and Gender in the LGBT Community*" Program. This collaborative effort with participants from DHS Pride, the Environmental Protection Agency, and PFLAG (Parents of Lesbians and Gays) brought to the forefront the challenges faced by women and people of color in the LGBT workforce. With a keynote speaker, followed by a moderated panel discussion, the program captivated the audience in the room, and those participating via audio conference bridge, with emotional storytelling.

  o Served as the principal on the Department of Justice Gender Identity Task Force, ensuring DHS representation on all three work streams: 1) Technical Assistance, Training and Outreach; 2) Intra-agency Efforts; and 3) Legal Authority and Enforcement. Authorized the development of a DHS list of resources for gender-identity related policies and programs for inclusion in the Department of Justice Federal Resources for LGBTQ Individuals. Convened a listening session with over 30 representatives from LGBT non-governmental organizations and federal agency partners.

  o Led the development and delivery of training to DHS Component personnel, including all reasonable accommodation program staff, designated Human Capital staff, and legal and other EEO professionals implementing Instruction 259-01-002, i.e., the DHS Procedures for Conducting a Department-Wide Search for a Reassignment as a Reasonable Accommodation of Last Resort.

  o Ensured that the Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals with Disabilities continued to be a major effort within every DHS Component during FY 2017. In support of these efforts, DHS, as a participating member of the Federal Exchange on Employment and Disability (FEED), hosted the second meeting focusing on the final rule implementing revisions to Section 501 of the Rehabilitation Act of 1973, as amended. DHS also developed a tracking mechanism to manage its progression in achieving full compliance with the

final rule, hosted quarterly meetings with the DHS Disability Employment Advisory Council, and invited guest speakers to share promising practices on Personal Assistance Services. DHS was involved in various recruiting initiatives targeting persons with disabilities throughout FY 2017, including the Workforce Recruitment Program and the Operation Warfighter Program. Also during FY 2017, DHS implemented a no-cost summer internship program for college students with disabilities by partnering with the Maryland Department of Rehabilitation Services.

o   Ensured the compilation and release of an updated Disability Employment Fact Sheet. This Fact Sheet provides Component hiring officials with comprehensive information on increasing the employment of persons with disabilities and serves as a guide to all employees on the disability employment program. Additions to the Fact Sheet included information on the final rule implementing revisions to Section 501 of the Rehabilitation Act of 1973, and DHS's annual disability hiring goals.

o   Ensured the development and delivery of a Selective Placement Program Coordinator (SPPC) training course to designated SPPCs and Disability Employment Program Managers (DPMs). This course was designed to provide participants with valuable insight into the roles, functions, and responsibilities of SPPCs and DPMs. Topics covered in this course ranged from strategies for achieving diversity and inclusion to tools for maintaining retention and strengthening career development program for individuals with disabilities.

o   Ensured the completion of a privacy impact assessment on the Accessibility Compliance Management System (ACMS) reasonable accommodation tracking tool. As a result, participating Components using ACMS to manage their reasonable accommodation programs now have guidance for properly storing medical documentation submitted in support of reasonable accommodation requests, resulting in a single case management tracking system.

o   Led the development of a Directive for the DHS Alternative Dispute Resolution (ADR) Program. The ADR Directive defines each participant's role in the ADR process and requires DHS managers and supervisors to participate in the ADR process in good faith and make every reasonable effort to resolve the issue(s) at the lowest level possible.

o   Published and disseminated *Focus on EEO and Diversity*, a quarterly newsletter, to the DHS EEOD community. Each edition reported and analyzed significant U.S. Supreme Court, federal court, and administrative decisions affecting the adjudication of EEO complaints; provided relevant and updated guidance on significant case processing issues; and discussed important diversity issues. The newsletter has received a significant amount of positive feedback for its content and usefulness for the DHS EEOD community, and was frequently disseminated to other EEO professionals at other government agencies.

o   Continued the compilation and distribution of a DHS-wide listing of Special Emphasis Programs (SEPs) for each commemorative month, including African American History Month and National Disability Employment Awareness Month. Throughout the year, three significant areas of the SEPs were promulgated: observances, outreach, and barrier analysis.

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

- In FY 2017, the DHS EEO Council, led by the Director for Equal Employment Opportunity and Diversity, continued its implementation of the EEO Council Strategic Plan FY 2016 – FY 2020. The plan articulates both a strategic vision for the EEO Council and the recommended steps for achieving that vision. The Plan is modeled after the EEOC's essential elements of a model EEO program, with each of the plan's goals roughly tracking one of the six essential elements. Cross-Component working groups, led by one or more Component EEO Directors, carry out the plan's measurable actions.

- DHS also continued its implementation of the DHS Inclusive Diversity Strategic Plan, FY 2016-2019. DHS seeks to leverage executive commitment to inclusive diversity on an ongoing basis, further sustain success in diversity and inclusion management, and take into account developments in industry and academic research. This Plan provides DHS with a path forward to creating and fostering a workforce that includes and engages our employees, and reflects all segments of society.

- During FY 2017, CRCL continued its participation in recurring high-level strategic activities, including: the Secretary's Bi-Weekly Component Heads' meetings; DHS Management Council meetings (chaired by the Under Secretary for Management and composed of all HQ DHS Component Chiefs of Staff, or the equivalent); Human Capital Leadership Council meetings (chaired by the Chief Human Capital Officer and composed of all DHS Component Human Resources Directors); the Workforce Planning Council, which shapes the workforce planning and workforce measurement programs for DHS; and the Deputy Secretary's Employee Engagement Steering Committee.

Essential Element C – Management and Program Accountability

- CRCL continued to collaborate with OCHCO on several initiatives and programs, including the strategic goals identified in the Addendum of the Human Capital Strategic Plan, the DHS Human Capital Annual Operational Plan for FY 2018 – 2019, and the DHS Inclusive Diversity Strategic Plan.

- The Diversity Management Section (DMS) conducted technical assistance sessions and training in-person using Adobe Connect for all DHS Components. Topics included an EEO Reports Update on the FY 2016 MD-715 and a preliminary review of the final rule amending the regulations implementing Section 501 of the Rehabilitation Act of 1973. Training was also provided on the new affirmative action plans for the recruitment, hiring, advancement, and retention of persons with disabilities.

- CRCL provided a briefing on the Mid-Year Accomplishments Report based on DHS-wide data provided to DHS Component special emphasis program managers and MD-715 preparers. This DHS-wide report included Special Emphasis Programs/Minority Serving Institutions high-level accomplishments, a Disability Employment Program update, and an MD-715 Part G Deficiencies update.

- DMS held Component and Special Emphasis Program meetings throughout the year to review narrative and statistical data relating to their MD-715 programs, Special Emphasis Programs, and the Disability Employment Program. Each Component was afforded an opportunity to discuss their data and progress.

- The DHS Corporate Recruitment Council (CRC), comprising recruiting personnel from DHS Components, coordinated the DHS's recruiting presence across Components with respect to many organizations in FY 2017 including the following:

  o Women in Federal Law Enforcement
  o National Asian Peace Officers Association
  o National Organization of Black Law Enforcement Executives
  o National Native American Law Enforcement Association
  o League of United Latin American Citizens
  o Hispanic Associations of Colleges and Universities
  o Hispanic American Police Command Officer Association
  o Society for American Indian Government Employees

- DHS increased its use of the Pathways Programs (Pathways), the federal government's primary entry point for students and recent graduates. In FY 2017, DHS hired 228 Pathways student interns, 208 summer interns, 155 recent graduates and 25 Presidential Management Fellows, totaling 616 Pathways Program participants. Of these, 40.3 percent identified as members of a minority racial or ethnic group, and 54.8 percent were women.

- DHS implemented the DHS Strategic Outreach and Recruitment Strategy (SOAR). The strategy has dual goals of increasing outreach to diverse groups and enhancing efficiencies in recruiting across DHS. The implementation is also focused on greater partnership between Component recruiting and workforce planning teams. DHS also sustained activities in support of achieving a "Fully Addressed" rating from the Government Accountability Office within its High Risk Report in the Human Capital Management/Targeted Outreach and Recruitment section. Some examples are the coordination of the DHS Pathfinder Hiring Event in December 2016, which focused on student interns and recent graduates, as well as the DHS Veterans Recruitment and Hiring Event in August 2017, which focused on bringing veterans into critical jobs within DHS.

- DHS issues the Component Recruitment and Outreach Plan (CROP) annually to assist Components with short and long-term planning for mission critical occupations. The FY 2017 CROP contained Component recruiting and outreach information for the upcoming fiscal year's activities focused on diverse populations, to include individuals with disabilities (IWD) and individuals with targeted disabilities (IWTDs). Components provided details on planned activities to attract IWD and IWTDs, which is then validated in the Recruiting, Outreach and Marketing Matrix. In FY 2017, DHS had 100 percent compliance with Component submissions of the CROPs.

Essential Element D – Proactive Prevention

- DHS continued to conduct an annual self-assessment to monitor progress of its affirmative employment programs; identify areas where barriers may operate to exclude racial, national
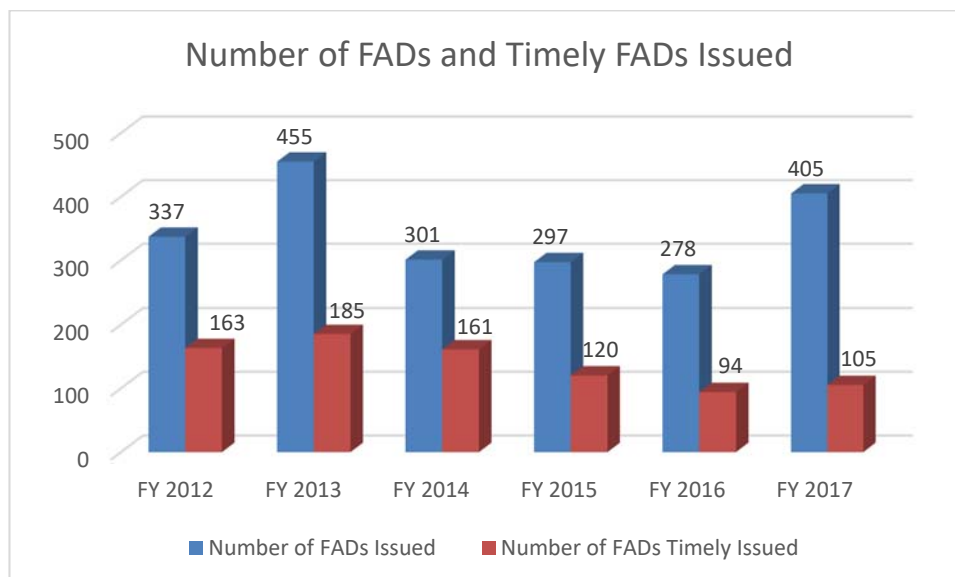
origin, or gender groups, or qualified individuals with disabilities; and develop strategic plans to mitigate or eliminate these identified barriers.

- Overall results of the FY 2017 DHS-wide Exit Survey indicated the following top three reasons for employee separations: lack of advancement opportunities, problems with supervisor/management, and family related/personal reasons. The United States Secret Service (USSS) and the Transportation Security Administration (TSA) maintain their own exit survey data and do not participate in the DHS-wide survey. Action plans (see Part I.3) have been revised to focus on issues identified in the exit survey results.

- CRCL provided EEO, anti-harassment, reasonable accommodation, and conflict resolution training for DHS HQ employees. CRCL developed supervisory and non-supervisory employee EEO training modules. A stand-alone module was also developed to cover allegations of harassment, which could be tailored for supervisory or non-supervisory audiences.

- CRCL provided basic EEO training every two weeks to new DHS employees, through the OCHCO and the National Protection and Programs Directorate (NPPD) New Employee Orientation programs.

- CRCL provided quarterly EEO training for supervisors participating in OCHCO's and the Office of the Inspector General's (OIG) HR Essentials Training programs.

- DHS's Disability Employment Program:

  o In FY 2017, DHS established, for DHS as a whole and each Component (except the OIG), hiring goals of 12 percent for IWD and 2 percent for IWTDs. In addition to the hiring goals by disability distribution, DHS set a Schedule A hiring goal of 1.5 percent of all new hires in non-law enforcement related and non-Transportation Security Officer (TSO) positions. DHS met its goal of 12 percent IWD new hires for FY 2017, and IWD represented 9.9 percent of the DHS workforce at yearend. In addition, in FY 2017, DHS 2.1 percent of new hires in non-law enforcement related and non-TSO positions were IWTDs, exceeding the 1.5 percent goal. Drivers for this progress include ensuring that employment of IWD/IWTD is a fixed agenda item for the DHS Corporate Recruitment Council.

  o In FY 2017, DHS hired a total of 273 employees using its Schedule A Hiring Authority under 5 C.F.R. § 213.3102 (and TSA's equivalent hiring authority). These hires represented a noteworthy increase of 72.78 percent from the 158 hires in FY 2016.

  o DHS continues to partner with the Department of Defense (DoD) Computer/Electronic Accommodation Program (CAP) to provide assistive technology accommodation solutions. During FY 2017, CAP provided 357 accommodations to 148 employees, resulting in a $126,658.90 cost savings to DHS.

Essential Element E - Efficiency

o During FY 2017, the DHS ADR program added 42 mediators to its Shared Neutrals Roster, bringing the roster total to 97 collateral-duty mediators. Two training courses for new mediators were held, along with a 90-minute refresher webinar on difficult conversations for the mediators on the Shared Neutrals Roster. Components' usage of the DHS Shared Neutrals Program resulted in a cost savings of $60,000 in FY 2017.

o The DHS ADR Program supported the Office of the Director of National Intelligence's (ODNI) EEO ADR Program, by providing guidance on the establishment of an ODNI shared neutrals program and training 25 new ODNI collateral-duty mediators.

o In FY 2017, the HQ Anti-Harassment Unit (AHU) was realigned to become part of CRCL. After the realignment, new standard operating procedures were established, a new tracking and filing system was developed, and the AHU backlog was eliminated. The average case processing time was reduced by nearly 50 percent. In FY 2016, the case processing time was approximately 356 days, compared to 183 days in FY 2017.

o CRCL provided EEO, anti-harassment and reasonable accommodation training for the DHS Office of the Inspector General's Human Resources Essentials program and the Office of Intelligence and Analysis.

• CRCL added four new employees to its training cadre to deliver EEO and Diversity training to DHS Headquarters Components. The training cadre consists of supervisory and non-supervisory employees.

• DHS timely submitted to the EEOC its Annual Federal Equal Employment Opportunity Statistical Report of Discrimination Complaints (EEOC Form 462).   (See more details in Essential Element F below.) Also, DHS timely submitted its Annual Notification and Federal Employee Antidiscrimination and Retaliation Act of 2002 (No FEAR Act) Report to Congress, the EEOC, the Department of Justice, and OPM.

• During FY 2017, the Complaints Management and Adjudication Section (CMAS) provided quarterly feedback to DHS Components on the quality of their Reports of Investigation (ROI) through use of an ROI Feedback Tool (Tool). The Tool was developed in coordination with Components and launched by CMAS in FY 2016 following a pilot period. The Tool allows CMAS's Adjudication Analysts to rate the quality of ROIs reviewed when preparing Final Agency Decisions (FADs). Analysts assigned numerical ratings for several criteria, related to legal sufficiency and readability, providing narrative information if needed to further explain numerical ratings. Components continued to welcome this detailed feedback throughout FY 2017. During the last quarter of FY 2017, a survey was distributed to the Components' Complaint Managers to measure the effectiveness of the Tool. Information on its usage will be included in a comprehensive report in FY 2018. Notably, the EEOC included the ROI Feedback Tool in its FY 2017 Innovative and Noteworthy Accomplishments Report, under the section for effective and efficient complaint processing.

- During FY 2017, the CMAS Senior Complaints Manager worked closely with TSA (the contract owner of the DHS enterprise complaints management data system) throughout the process of preparing a request for competitive bids and for the selection of a vendor for the DHS enterprise complaints management data system. Along with the new contract award, approximately 300 new custom reports were created. CMAS assisted in the review and testing of these reports and designed several reports specifically for CMAS's unique database administration needs.

- CMAS is required to vet DHS employees nominated to receive certain high-level awards from DHS leadership. The vetting consists of a review of EEO complaint histories to ensure there is no disqualifying information found on the nominees, including, but not limited to, having been found responsible for discriminatory conduct. During FY 2017, CMAS vetted over 4,430 employees. CMAS dedicated additional internal resources to this area and completed 96 percent of vetting requests by their assigned due date.

- EEOC Regulations, at 29 C.F.R. Part 1614, generally require merit FADs to be issued within 60 days of election of, or failure to elect a FAD. Upon completion of the investigation in a mixed-case complaint, a final decision will be issued within 45 days, without an initial opportunity for a hearing. During FY 2017, CMAS issued or administratively closed 822 final agency actions, including 405 merit FADs. DHS had an internal performance measure goal to issue 40 percent of merit FADs by their regulatory due date. For reasons directly related to diminished CMAS resources throughout the fiscal year and an increased volume of incoming FAD requests, CRCL did not meet its goal, timely issuing 26 percent of merit FADs. Further, CMAS amassed an inventory of pending merit FADs during the year. CMAS approached the situation strategically, striking a balance between issuing regulatory timely FADs while also not disadvantaging complainants whose cases could not be issued by the regulatory date, either due to late receipt within CRCL or as a result of CMAS's temporarily diminished resources. To further address the growing inventory, CRCL leadership approved funding for contract support for the drafting of merit FADs. The contract was approved in late fourth quarter of FY 2017, and is expected to have a positive impact on the issuance of merit FADs in FY 2018. At the conclusion of FY 2017, CMAS was again fully resourced with analysts and support staff.

Number of FADs and Timely FADs Issued

Fiscal Year	Number of FADs Issued	Number of FADs Timely Issued
FY 2012	337	163
FY 2013	455	185
FY 2014	301	161
FY 2015	297	120
FY 2016	278	94
FY 2017	405	105

Essential Element F - Responsiveness and Legal Compliance

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

Section 508 of the Rehabilitation Act

The DHS Office of Accessible Systems & Technologies (OAST) is responsible for implementing the requirements of Section 508 of the Rehabilitation Act of 1973, as amended. In addition to implementing Section 508 compliance at DHS, OAST ensures equal access to information and data for employees and customers with disabilities for several federal shared services, including the Financial Systems Modernization project with the Department of the Interior, the Human Resources Information Technology initiative with the Department of Agriculture National Finance Center, and the e-Travel program with the General Services Administration (GSA). In each case, OAST achieved successful outcomes by using a combination of IT governance to ensure accessibility, certified Trusted Testers to set baselines of Section 508 conformance, and Trusted Tester training to enable federal partners to continue with accessibility responsibilities moving forward.

Accomplishments during FY 2017 included:

- *DHS Accessibility Help Desk (AHD)*: The DHS Accessibility Help Desk served as the single point of contact for disability-related issues throughout DHS, especially accommodation needs, relating to electronic and information technology accessibility. In FY 2017, the AHD processed 6,300 help desk requests.

- In collaboration with the Federal Chief Information Officers Council Accessibility Community of Practice, GSA, and the U.S. Access Board, OAST personnel led two of the Section 508 Transition working groups to develop guidance for agencies to expedite implementation of the Revised Section 508 Accessibility Standards. Guidance developed included a Section 508 policy template, a detailed applicability checklist, procurement process information, and author and developer resources for those who create electronic documents.

- *Training Development/Delivery*: The OAST Training Program provides awareness and training on IT accessibility related topics. OAST offered seven[1] different training courses and logged 7,429 course completions during FY 2017 through online, classroom, one-on-one, and hands-on trainings. OAST continued to deliver Trusted Tester training and certification and, to date, has certified approximately 1,100 Trusted Testers, with 453 new Trusted Testers in FY 2017 alone, an increase of approximately 10 percent over FY 2016 certifications.

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[1] The courses offered were: 1) Section 508 What is it and Why it's important, 2) Section 508 testing tools installation, 3) Section 508 Standards for Applications, 4) Trusted Tester Training, 5) Trusted Tester Exam, 6) Section 508 Compliance for COTRs, Program and Project Mangers, and 7) Creating Section 508 Compliant Documents (Word, PPT, Excel, Adobe and Fillable Forms).

- During FY 2017, OAST collaborated with members of the Federal Chief Information Officers Counsel Accessibility Community of Practice to update the harmonized software and website 508 conformance test process to support a wider set of test environments. This update decreased the level of effort required to establish Section 508 conformance test environments government-wide, and increases the flexibility of the test process overall.

- *Application/Document Testing*: Within DHS HQ, OAST is responsible for testing IT applications for compliance based on Section 508 accessibility standards and best practices. In FY 2017, OAST tested 75 IT and Web-based applications for Section 508 compliance. OAST also tested 353 electronic documents (10,860 pages), and assisted in ensuring those documents were made accessible as needed.

- *Governance*: OAST worked diligently over the past couple of years to integrate Section 508 requirements within the DHS IT governance processes. During FY 2017, OAST conducted 4,245 change control reviews as a member of OCIO Configuration Control Boards (CCBs) and the Headquarters Services Division (HSD) Review and Approval Committee (RAC). OAST also conducted 255 Information Technology Acquisitions Reviews (ITARs) for acquisitions with a combined value of more than $2.5 million.

Workforce Profile and Trend Analysis

The DHS workforce trend analysis discussed below was conducted on the permanent employee workforce. Temporary employees were not included because they are normally hired for temporary needs, their separation is pre-destined, and their makeup can change significantly from year to year, which makes their inclusion less relevant to our analysis of employees, by Ethnicity/Race Indicator, sex, and disability, as they move through the human capital lifecycle.

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

The analysis presumes that parity is the ideal outcome. In a world of parity, all groups are statistically expected to move through the human capital life cycle in proportion to their size. In the tables below, parity would result if each row in the table contained essentially the same number across the board. For example, assuming Black males are 7.5 percent of the permanent DHS workforce, at parity, they would constitute 7.5 percent of attrition, promotions, low pay grades, middle pay grades, and high pay grades. If this is not occurring, it constitutes a trigger, which may suggest a possible EEO barrier. Eight years of data are provided to allow assessment of trends for each race, gender, and ethnic group, and for employees who report a disability or a targeted disability. Successful human capital strategies can have a small effect on the workforce in a particular year. Therefore, analysis of several years of data is often useful in these types of assessments.

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

Additionally, both National Civilian Labor Force (NCLF) and Relevant Civilian Labor Force (RCLF) statistics are provided as benchmarks. The National CLF consists of all persons over 16 years of age, who are not institutionalized or on active duty in the armed forces, and who either have a job or want a job. The RCLF is a weighted average of demographic statistics pertaining only to occupations seen within DHS.

The total permanent DHS workforce increased by 3,238 employees (1.79 percent) from 180,728 in FY 2016 to 183,966 in FY 2017.

					Pay Grade				
Year	% of Permanent DHS Workforce	% of Hires	% of Attrition	% of Promotions	% of Grades 1-4	% of Grades 5-9	% of Grades 10-12	% of Grades 13-15	% of Executive and Senior Leader
FY17	16.2%	13.8%	12.0%	14.0%	9.0%	13.7%	21.7%	11.3%	5.4%
FY16	16.1%	13.9%	11.8%	14.8%	7.9%	12.9%	21.9%	11.5%	5.3%
FY15	15.9%	13.6%	11.0%	14.1%	7.5%	11.8%	22.3%	11.4%	4.1%
FY14	15.7%	10.2%	10.9%	13.2%	7.0%	11.8%	21.9%	11.4%	4.1%
FY13	15.7%	11.1%	10.3%	15.9%	6.5%	12.0%	21.8%	11.3%	4.4%
FY12	15.6%	9.9%	10.4%	18.6%	6.0%	12.2%	21.4%	11.4%	4.8%
FY11	15.7%	12.9%	11.0%	21.1%	5.9%	13.2%	21.0%	11.3%	4.1%
FY10	15.6%	9.1%	11.1%	26.2%	6.2%	14.1%	20.5%	11.0%	3.8%

DHS Permanent Workforce Trend for Hispanic Males

Hispanic Males – 16.2% of DHS, 5.2% of National Civilian Labor Force, 4.8% of Relevant Civilian Labor Force

The workforce participation rate for Hispanic males at DHS is significantly above the NCLF and RCLF rates. Hispanics constitute 30 percent of the Customs and Border Protection (CBP) Officers and over half of Border Patrol Agents[2]. CBP Officers and Border Patrol Agents require fluency in Spanish for initial placements along the southern border, Florida, and Puerto Rico, a requirement that is not present in the standard RCLF comparison. This job requirement, in conjunction with the high percentage of jobs being located in the southern Border States, greatly increased Hispanic representation in these occupations.

In FY 2017, hires were above the statistically expected rates, and attrition was below the workforce representation rate. The promotion rate for Hispanic males remained slightly below the workforce

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[2] From workforce data table A6.

participation rate. The representation of Hispanic males in Executive/Senior Leader pay grades continued to rise, although it was still significantly below the workforce participation rate.

					Pay Grade				
DHS Permanent Workforce Trend for Hispanic Females									
Year	% of Permanent DHS Workforce	% of Hires	% of Attrition	% of Promotions	% of Grades 1-4	% of Grades 5-9	% of Grades 10-12	% of Grades 13-15	% of Executive and Senior Leader
FY17	6.1%	9.0%	6.7%	7.7%	1.6%	9.7%	5.8%	3.6%	1.8%
FY16	5.9%	8.9%	6.4%	6.7%	1.7%	9.2%	5.7%	3.5%	2.2%
FY15	5.7%	8.7%	6.0%	5.9%	2.0%	8.6%	5.6%	3.4%	2.1%
FY14	5.5%	7.0%	6.3%	6.4%	2.0%	8.0%	5.6%	3.3%	1.9%
FY13	5.5%	7.8%	5.4%	5.4%	1.7%	7.9%	5.6%	3.2%	1.7%
FY12	5.3%	6.1%	5.4%	5.0%	1.5%	7.5%	5.5%	3.2%	1.3%
FY11	5.3%	5.2%	4.5%	5.1%	1.5%	7.3%	5.3%	3.1%	1.4%
FY10	5.2%	3.6%	4.2%	5.3%	2.3%	7.0%	5.4%	3.1%	1.2%
Hispanic Females – 6.1% of DHS, 5.2% of National Civilian Labor Force, 4.0% of Relevant Civilian Labor Force									

The workforce participation and hire rates for Hispanic females at DHS increased in FY 2017 and were above the NCLF and RCLF participation rates. The attrition rate also increased in FY 2017 year and remains above the participation rate. The promotion rate increased this past year and continued to exceed the workforce participation rate.

Hispanic females were significantly overrepresented at lower pay grades and participating at a lower than expected rate at higher pay grades, when compared to their workforce participation rate.

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DHS Permanent Workforce Trend for White Males

Year	% of Permanent DHS Workforce	% of Hires	% of Attrition	% of Promotions	Pay Grade				
					% of Grades 1-4	% of Grades 5-9	% of Grades 10-12	% of Grades 13-15	% of Executive and Senior Leader
FY17	38.6%	30.2%	35.1%	34.3%	53.1%	26.3%	38.9%	47.7%	55.6%
FY16	39.2%	28.3%	36.7%	38.4%	53.4%	27.0%	39.4%	48.3%	55.8%
FY15	40.1%	31.5%	38.2%	42.1%	55.2%	29.1%	39.4%	49.1%	57.0%
FY14	40.6%	36.6%	38.1%	40.0%	55.3%	30.9%	39.4%	49.6%	58.5%
FY13	40.7%	35.1%	39.6%	42.6%	55.9%	31.4%	39.2%	50.2%	57.8%
FY12	40.9%	39.2%	39.8%	43.1%	58.9%	32.2%	39.7%	50.5%	58.6%
FY11	41.1%	40.4%	41.0%	41.6%	56.4%	33.0%	39.8%	50.9%	58.8%
FY10	41.3%	47.5%	41.1%	40.8%	57.2%	33.8%	39.7%	51.6%	59.9%

White Males – 38.6% of DHS, 38.3 of National Civilian Labor force, 43.8% of Relevant Civilian Labor Force

The White male workforce participation rate at DHS continued to decline in FY 2017. It slightly exceeded the NCLF rate in FY 2017, but remained below the RCLF rate. The hiring rate was well below the NCLF and RCLF rates, while the promotion rate continued to be below the workforce participation rate.

White males were participating at a lower than expected rate at the GS 5-9 pay grades and at a higher than expected rate at higher pay grades, including Executive/Senior Leader grades. The participation rates in the higher grades have been consistently trending downward for the White male group.

DHS Permanent Workforce Trend for White Females

Year	% of Permanent DHS Workforce	% of Hires	% of Attrition	% of Promotions	Pay Grade				
					% of Grades 1-4	% of Grades 5-9	% of Grades 10-12	% of Grades 13-15	% of Executive and Senior Leader
FY17	15.6%	16.8%	18.8%	17.5%	9.4%	18.2%	13.3%	16.9%	21.6%
FY16	15.8%	16.5%	18.3%	16.8%	9.4%	18.9%	13.3%	16.8%	22.4%
FY15	15.9%	16.7%	19.5%	16.5%	8.8%	19.6%	13.5%	16.5%	21.8%
FY14	16.2%	17.9%	20.4%	17.9%	10.8%	19.7%	13.9%	16.5%	21.5%
FY13	16.4%	18.0%	20.4%	16.2%	11.3%	19.9%	14.2%	16.5%	21.1%
FY12	16.6%	20.5%	20.2%	14.9%	11.4%	20.1%	14.4%	16.6%	20.9%
FY11	16.7%	16.5%	20.6%	14.6%	12.9%	19.5%	14.7%	16.7%	21.7%
FY10	17.0%	18.5%	20.3%	12.4%	12.4%	19.4%	15.3%	16.9%	22.0%

White Females – 15.6% of DHS, 34.0% of National Civilian Labor force, 30.6% of Relevant Civilian Labor Force

The White female participation rate at DHS was significantly lower than the NCLF and RCLF rates and continued to trend downward. This is attributed to a higher than expected attrition rate, which

slightly outpaced the higher than expected hire rate. The White female promotion rate continued to be above the participation rate, with White females represented at higher than expected rates in the higher pay grades. Their participation was highest at the Executive/Senior Leader pay grades.

					Pay Grade				
Year	% of Permanent DHS Workforce	% of Hires	% of Attrition	% of Promotions	% of Grades 1-4	% of Grades 5-9	% of Grades 10-12	% of Grades 13-15	% of Executive and Senior Leader
FY17	7.6%	9.7%	9.5%	8.1%	17.6%	9.9%	6.6%	6.7%	6.4%
FY16	7.5%	10.6%	8.8%	7.6%	18.5%	10.0%	6.4%	6.6%	6.5%
FY15	7.3%	9.7%	8.4%	6.7%	17.2%	9.7%	6.2%	6.5%	7.0%
FY14	7.2%	8.8%	8.2%	6.8%	15.3%	9.3%	6.1%	6.4%	6.6%
FY13	7.1%	8.9%	8.1%	6.1%	14.7%	9.1%	6.1%	6.3%	7.1%
FY12	7.0%	7.1%	8.3%	5.6%	13.2%	8.9%	6.1%	6.1%	6.9%
FY11	7.1%	8.4%	7.9%	5.3%	12.5%	8.7%	6.2%	6.0%	7.0%
FY10	6.9%	7.5%	7.8%	4.8%	12.2%	8.3%	6.2%	5.9%	6.4%

DHS Permanent Workforce Trend for Black Males

Black Males – 7.6% of DHS, 5.5% of National Civilian Labor Force, 4.7% of Relevant Civilian Labor Force

The workforce participation rate and hire rate of Black males at DHS had been trending upward and remained well above the NCLF and RCLF participation rates. This group has increased representation in higher grades over time, although participation was below the overall representation rate. Black males' SES participation dropped slightly in FY 2016 and FY 2017. The promotion rate exceeded the participation rate for the first time in recent years in FY 2016, and continued to rise in FY 2017. Black males' participation at lower pay grades edged downward in FY 2017, a slight reversal of the slow, steady increases in recent years. Their higher than expected attrition rate was a concern.

	DHS Permanent Workforce Trend for Black Females								
							Pay Grade		
Year	% of Permanent DHS Workforce	% of Hires	% of Attrition	% of Promotions	% of Grades 1-4	% of Grades 5-9	% of Grades 10-12	% of Grades 13-15	% of Executive and Senior Leader
FY17	8.3%	12.0%	10.7%	9.8%	4.9%	13.3%	6.2%	7.1%	4.0%
FY16	8.2%	12.7%	10.5%	8.1%	5.3%	13.2%	6.0%	6.9%	3.9%
FY15	7.9%	10.7%	9.8%	7.4%	5.3%	12.9%	5.8%	6.8%	4.4%
FY14	7.9%	10.6%	9.4%	8.2%	5.3%	12.4%	5.9%	6.6%	3.5%
FY13	7.8%	10.9%	9.8%	7.0%	6.4%	12.1%	6.0%	6.5%	3.9%
FY12	7.8%	9.7%	9.5%	6.2%	5.1%	11.8%	5.9%	6.5%	3.9%
FY11	7.7%	9.6%	9.0%	5.9%	6.1%	11.3%	5.8%	6.4%	3.6%
FY10	7.5%	8.3%	10.0%	4.5%	5.3%	10.6%	6.0%	6.2%	3.4%
Black Females – 8.3% of DHS, 6.5% of National Civilian Labor Force, 6.2% of Relevant Civilian Labor Force									

The workforce participation rate of Black females at DHS has been slowly, but steadily, increasing and remained above the NCLF and RCLF participation rates. The group was being hired at a rate that was above the NCLF and RCLF. The promotion rate was above their representation in the workforce. However, they had a higher than expected attrition rate. This group also had lower than expected participation in higher-graded positions, and higher participation in lower-graded positions, grades 5-9.

	DHS Permanent Workforce Trend for Asian Males								
							Pay Grade		
Year	% of Permanent DHS Workforce	% of Hires	% of Attrition	% of Promotions	% of Grades 1-4	% of Grades 5-9	% of Grades 10-12	% of Grades 13-15	% of Executive and Senior Leader
FY17	3.6%	3.8%	3.2%	3.8%	2.0%	4.0%	3.9%	3.1%	1.6%
FY16	3.6%	3.9%	3.3%	3.7%	1.7%	4.0%	3.8%	3.0%	1.2%
FY15	3.5%	4.4%	3.0%	3.5%	2.1%	3.9%	3.9%	2.9%	1.2%
FY14	3.4%	3.8%	2.9%	3.5%	1.9%	3.6%	3.8%	2.8%	1.3%
FY13	3.3%	3.7%	2.6%	3.3%	1.7%	3.5%	3.7%	2.8%	1.7%
FY12	3.3%	3.1%	2.6%	3.3%	1.9%	3.3%	3.8%	2.7%	1.4%
FY11	3.2%	3.2%	2.9%	3.2%	2.5%	3.2%	3.7%	2.6%	1.2%
FY10	3.2%	2.5%	2.6%	3.4%	2.1%	3.2%	3.7%	2.5%	1.4%
Asian Males – 3.6% of DHS, 2.0% of National Civilian Labor Force, 2.6% of Relevant Civilian Labor Force									

In FY 2017, Asian males were represented in the DHS permanent workforce at a rate above the NCLF and RCLF rates. Their workforce participation rate has gradually increased in recent years.

The attrition rate was below their participation rate, and the promotion rate continued to increase and remain slightly above parity.

Asian males were participating at a lower than expected rate at the higher pay grades and senior level, although their participation at both GS 13-15 and Executive/Senior levels were trending up.

TSOs and CBP Officers account for nearly 50 percent of all Asian males in the DHS workforce.

					Pay Grade				
Year	% of Permanent DHS Workforce	% of Hires	% of Attrition	% of Promotions	% of Grades 1-4	% of Grades 5-9	% of Grades 10-12	% of Grades 13-15	% of Executive and Senior Leader
FY17	1.9%	2.1%	1.4%	2.3%	0.5%	2.2%	1.6%	2.0%	1.8%
FY16	1.8%	2.1%	1.7%	2.0%	0.6%	2.1%	1.6%	1.9%	1.6%
FY15	1.8%	2.0%	1.7%	1.9%	0.2%	2.1%	1.6%	1.8%	1.3%
FY14	1.7%	2.4%	1.4%	1.9%	0.5%	2.0%	1.6%	1.8%	1.1%
FY13	1.7%	1.8%	1.6%	1.7%	0.4%	1.8%	1.6%	1.7%	1.2%
FY12	1.6%	1.9%	1.5%	1.6%	0.8%	1.8%	1.6%	1.6%	1.2%
FY11	1.6%	1.6%	1.2%	1.4%	1.4%	1.8%	1.6%	1.6%	1.4%
FY10	1.6%	1.3%	1.4%	1.2%	1.2%	1.7%	1.6%	1.5%	1.4%

DHS Permanent Workforce Trend for Asian Females

Asian Females – 1.9% of DHS, 1.9% of National Civilian Labor Force, 2.0% of Relevant Civilian Labor Force

The participation rate for Asian females was on par with the NCLF and RCLF rates, and the hire rate was slightly above. In FY 2017, the attrition rate dropped, remaining below the participation rate.

Promotions of Asian females were slightly higher than the workforce participation rate. The group was spread proportionately throughout the pay grades, represented very close to parity at the higher grades.

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DHS Permanent Workforce Trend for Pacific Islander Males

Year	% of Permanent DHS Workforce	% of Hires	% of Attrition	% of Promotions	Pay Grade				
					% of Grades 1-4	% of Grades 5-9	% of Grades 10-12	% of Grades 13-15	% of Executive and Senior Leader
FY17	0.34%	0.36%	0.42%	0.47%	0.13%	0.49%	0.35%	0.18%	0.33%
FY16	0.34%	0.65%	0.42%	0.34%	0.12%	0.50%	0.35%	0.16%	0.22%
FY15	0.32%	0.43%	0.30%	0.38%	0.21%	0.43%	0.33%	0.17%	0.23%
FY14	0.31%	0.65%	0.33%	0.42%	0.38%	0.43%	0.30%	0.17%	0.35%
FY13	0.29%	0.54%	0.26%	0.36%	0.00%	0.39%	0.31%	0.15%	0.35%
FY12	0.27%	0.46%	0.33%	0.27%	0.11%	0.36%	0.27%	0.14%	0.36%
FY11	0.25%	0.44%	0.18%	0.21%	0.00%	0.31%	0.26%	0.12%	0.37%
FY10	0.21%	0.27%	0.11%	0.20%	0.00%	0.21%	0.26%	0.09%	0.13%

Pacific Islander Males – 0.34% of DHS, 0.1% of National Civilian Labor Force and 0.05% of Relevant Civilian Labor Force

Since FY 2013, Native Hawaiian/Pacific Islander males at DHS have been represented at over three times the NCLF rate. The attrition rate had remained relatively low in most fiscal years but saw an increase in FY 2016 and FY 2017, rising above the participation rate.

Native Hawaiian/Pacific Islander males saw an increase in the promotion rate, exceeding the participation rate. Representation at grades 13-15 remained below the participation rate but has been slowly trending upward.

Caution should be used when drawing inferences from the data, due to the small size of the population (626 in the workforce), which can produce large percentage swings that may not be statistically significant.

DHS Permanent Workforce Trend for Pacific Islander Females

| Year | % of Permanent DHS Workforce | % of Hires | % of Attrition | % of Promotions | Pay Grade | | | | |
					% of Grades 1-4	% of Grades 5-9	% of Grades 10-12	% of Grades 13-15	% of Executive and Senior Leader
FY17	0.29%	0.42%	0.47%	0.32%	0.25%	0.46%	0.24%	0.22%	0.11%
FY16	0.29%	0.45%	0.43%	0.27%	0.00%	0.47%	0.25%	0.21%	0.00%
FY15	0.29%	0.34%	0.41%	0.30%	0.00%	0.47%	0.25%	0.21%	0.00%
FY14	0.30%	0.41%	0.52%	0.28%	0.00%	0.45%	0.26%	0.22%	0.24%
FY13	0.31%	0.34%	0.46%	0.27%	0.00%	0.47%	0.27%	0.22%	0.12%
FY12	0.32%	0.40%	0.51%	0.23%	0.00%	0.49%	0.28%	0.22%	0.12%
FY11	0.33%	0.27%	0.44%	0.30%	0.00%	0.48%	0.28%	0.23%	0.12%
FY10	0.35%	0.29%	0.43%	0.24%	0.11%	0.50%	0.30%	0.22%	0.00%
Pacific Islander Females – 0.29% of DHS, 0.1% of National Civilian Labor Force and 0.08% Relevant Civilian Labor Force									

Native Hawaiian/Pacific Islander females' participation and hire rates continue to exceed the NCLF and RCLF. The attrition rate increased in FY 2016 and FY 2017, remaining above the participation rate.

Native Hawaiian/Pacific Islander females are being promoted roughly at parity, but continue to participate at a lower than expected rate in the higher pay grades. Caution should be used when drawing inferences from the data, due to the very small size of the population (410 in the workforce), which can produce large percentage swings that may not be statistically significant.

DHS Permanent Workforce Trend for Native American Males

| Year | % of Permanent DHS Workforce | % of Hires | % of Attrition | % of Promotions | Pay Grade | | | | |
					% of Grades 1-4	% of Grades 5-9	% of Grades 10-12	% of Grades 13-15	% of Executive and Senior Leader
FY17	0.61%	0.55%	0.63%	0.51%	0.75%	0.51%	0.63%	0.64%	1.00%
FY16	0.62%	0.57%	0.65%	0.58%	0.74%	0.50%	0.64%	0.66%	0.56%
FY15	0.62%	0.56%	0.80%	0.50%	0.75%	0.47%	0.68%	0.66%	0.47%
FY14	0.64%	0.44%	0.82%	0.48%	0.75%	0.48%	0.68%	0.69%	0.71%
FY13	0.66%	0.50%	0.74%	0.55%	0.83%	0.51%	0.69%	0.71%	0.59%
FY12	0.66%	0.44%	0.75%	0.66%	0.53%	0.54%	0.69%	0.73%	0.48%
FY11	0.68%	0.54%	0.83%	0.62%	0.64%	0.59%	0.68%	0.75%	0.37%
FY10	0.70%	0.51%	0.66%	0.69%	0.53%	0.66%	0.66%	0.78%	0.26%
Native American Males – 0.61% of DHS, 0.6% of National Civilian Labor Force, 0.6% of Relevant Civilian Labor Force									

Native American males have approximately the same workforce participation rate as the NCLF and RCLF participation rates. Attrition continued to drop, while promotions remained slightly below the participation rate.

Native American males were spread fairly evenly throughout the range of pay grades. Caution should be used when drawing inferences from the data due to the small size of the population (1,121 in the permanent workforce), which can produce large swings in percentages based on movement of a small number of employees. The participation rate at the Executive/Senior level increased from 0.56 percent to 1.00 percent. The increase was due to the number of employees at this pay level increasing from 5 to 9 in FY 2017.

DHS Permanent Workforce Trend for Native American Females									
					Pay Grade				
Year	% of Permanent DHS Workforce	% of Hires	% of Attrition	% of Promotions	% of Grades 1-4	% of Grades 5-9	% of Grades 10-12	% of Grades 13-15	% of Executive and Senior Leader
FY17	0.29%	0.42%	0.47%	0.32%	0.25%	0.46%	0.24%	0.22%	0.11%
FY16	0.29%	0.45%	0.43%	0.27%	0.00%	0.47%	0.25%	0.21%	0.00%
FY15	0.29%	0.34%	0.41%	0.30%	0.00%	0.47%	0.25%	0.21%	0.00%
FY14	0.30%	0.41%	0.52%	0.28%	0.00%	0.45%	0.26%	0.22%	0.24%
FY13	0.31%	0.34%	0.46%	0.27%	0.00%	0.47%	0.27%	0.22%	0.12%
FY12	0.32%	0.40%	0.51%	0.23%	0.00%	0.49%	0.28%	0.22%	0.12%
FY11	0.33%	0.27%	0.44%	0.30%	0.00%	0.48%	0.28%	0.23%	0.12%
FY10	0.35%	0.29%	0.43%	0.24%	0.11%	0.50%	0.30%	0.22%	0.00%
Native American Females – 0.29% of DHS, 0.5% of National Civilian Labor Force, 0.47% of Relevant Civilian Labor Force									

Native American females have a lower workforce representation rate than the NCLF and RCLF rates. Their attrition rate continued to be higher than the participation rate. The promotion rate was slightly above the workforce participation rate. Native American females were disproportionately concentrated at grades 5-9. As with Native American males, caution should be used when drawing inferences from the data due to the small size of the population (536 in the permanent workforce), which can produce large swings that may not be statistically significant.

The table below summarizes the triggers identified in the preceding workforce trend tables. Each entry indicates a participation rate that is below the relevant benchmark. The text of the entry indicates the trend over the years presented in the relevant trend table. Note that Trending Up for attrition means the attrition rate is increasing, which will have a *negative* impact on the overall participation rate. On the other hand, Trending Up for hires and GS 13-Executive/Senior Leader indicates *increasing* overall workforce participation and participation in the higher pay grades.

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Summary of Triggers Identified in Workforce Trend Tables (FY10-17)
Entries indicate a trigger; text of entry indicates general trend direction over the period, or no significant trend up or down

Group	% of Permanent DHS Workforce	% of Hires	% of Attrition	% of Promotions	% of GS13-Executive/Senior Leader
Hispanic Male				No Trend	No Trend
Hispanic Female			Trending Up		Trending Up
White Male		Trending Down		Trending Down	
White Female	Trending Down		No Trend		
Black Male			Trending Up		Trending Up GS13-15; No Trend Executive/Senior Leader
Black Female			Trending Up		Trending Up
Asian Male					Trending Up
Asian Female					
Pacific Islander Male			Trending Up		Trending Up
Pacific Islander Female			No Trend		No Trend
Native American Male				Trending Down	
Native American Female	Trending Down		No Trend		No Trend

It appears that higher than expected attrition, especially for women, and lower than expected participation in the higher pay grades were two common triggers in 2017. For attrition, the first trigger, several of the groups that have a trigger are trending to a higher attrition rate. Note that the attrition rates reviewed here were tabulated as the relevant group's portion of all attrition from DHS. This is the same method used in workforce table A13. As a result, it is possible that the increasing attrition rates for some minority groups could be due in part to the increasing workforce participation rates for the same groups. However, an attrition rate above the participation rate remains a significant trigger.

Examination of exit survey data indicated the top three non-retirement reasons for exiting DHS were difficulties with supervision/management, lack of advancement opportunities, and personal/family-related reasons. A review of Federal Employee Viewpoint Survey (FEVS) data indicated low ratings for work/life programs and alternate work schedules. Issues with personal/family related reasons, work/life balance, and work schedules may disproportionately impact women, who frequently assume primary care-taker roles for children, the ill, and the elderly.[3] The 2017 Best Places to Work ranked DHS 18th out of 18 large agencies.[4] The overall score of 52 was based on three FEVS questions chosen for their ability to predict intent to remain in the organization. The score was therefore particularly relevant to the issue of attrition.

These findings are addressed in detail in Part I.3 of this report, which notes high separation rates for several minority groups and women. Part I.3 was updated in FY 2017 to bring focus to the findings relating to issues with supervision/management, lack of advancement opportunities, personal/family related reasons, insufficient work/life programs, and lack of alternate work schedules.

The second trigger, i.e., lower than expected representation at the higher grades, is seen in eight of the ten minority groups. Five of the groups are trending towards higher representation, which is a positive sign. Three groups, Black females, Hispanic males, and Hispanic females, are participating at a significantly lower than expected rate in the higher pay grades. At the request of the EEOC and OPM, DHS completed a barrier analysis investigating lower than expected representation of Hispanic employees in higher pay grades. Significant findings from the barrier analysis include:

1. **Low representation by Hispanic employees in occupations that lead to Executive/Senior Leader positions.** An analysis of career paths leading to these positions identified five job series that were the prior job series of over 70 percent of current Executives/Senior Leaders. In these five series, Hispanic males and females are represented below their overall workforce participation rates. The finding in the trend table of no increase in representation at higher grades for Hispanic males may be due to their high representation in the Border Patrol Agent job series, of which 20 percent are at the GS-13 or higher level. Over 30 percent of positions at DHS overall are at the GS-13 and higher level. While the Border Patrol Agent job series offers promotional opportunities, it does so at a lower rate than many other DHS occupations.

2. **Lower percentage of Hispanic DHS workforce possesses a college degree than non-Hispanic groups.** This is significant because some occupations in DHS that offer positions at GS-13 and above have a college degree requirement.

3. **Lower average age of Hispanic DHS workforce compared to non-Hispanic workforce.** Higher graded positions tend to be filled by older employees with more experience.

The barrier analysis team also found that a relatively small number of job series account for the majority of positions at the GS-13 and higher levels. Most of these occupations are unique to a small number of DHS Components and are not part of the more general series of positions across DHS.

DHS, through the efforts of the EEO Directors Council, conducted an independent review of workforce triggers for each DHS Component. The triggers were tallied across Components to identify those that were

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[3] EEOC Women's Work Group Report, 2011. https://www.eeoc.gov/federal/reports/women_workgroup_report.cfm
[4] DHS raised its score this year by 6.2 points but remained last among all large federal agencies.

more frequently seen across the DHS Components. Low representation at higher grades for groups other than White males was one frequently observed trigger. As part of the same effort, CRCL reviewed existing Component MD 715 Parts I and J and found a very high correlation between the triggers identified in the new data analysis and the triggers Components were pursuing in their individual Parts I and J. These triggers includes low representation of groups at higher grades.

The team also expects the upward trend seen in representation of most minority groups in higher grades to continue. Over 66 percent of White employees in grades GS-13 and higher are, or will become, retirement eligible in FY 2018. As shown in workforce table A4-1, the feeder pool grades for higher grades are more diverse than the grades they feed, portending a more diverse cohort of employees at higher grades in the future.

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

Part I.1 relates to the finding of lower-than-expected representation for women and minorities in some mission-critical occupations. Based on examination of workforce table A6, completion of remaining planned activities, and finding that major-occupational-classification-related Part I's are present in DHS Component MD-715 reports, DHS closed out Part I.1 this year.

DHS Permanent Workforce Trend for Individuals With Disabilities

Year	% of Permanent DHS Workforce	% of Hires	% of Attrition	% of Promotions	Pay Grade				
					% of Grades 1-4	% of Grades 5-9	% of Grades 10-12	% of Grades 13-15	% of Executive and Senior Leader
FY17	9.9%	12.0%	10.1%	9.9%	7.5%	9.5%	9.0%	11.2%	7.7%
FY16	9.1%	10.5%	10.3%	8.7%	6.3%	8.8%	8.3%	10.2%	7.4%
FY15	8.6%	10.0%	10.1%	8.4%	4.5%	8.3%	7.9%	9.5%	7.0%
FY14	8.2%	9.9%	9.9%	6.6%	3.8%	8.2%	7.4%	9.0%	6.7%
FY13	7.5%	8.5%	8.7%	6.2%	3.9%	7.3%	6.9%	8.2%	6.4%
FY12	7.0%	9.2%	8.9%	5.3%	5.0%	7.0%	6.4%	7.5%	5.9%
FY11	6.3%	7.0%	8.6%	4.4%	5.9%	6.3%	5.9%	6.6%	5.4%
FY10	5.9%	7.0%	8.0%	3.7%	5.2%	5.9%	5.6%	6.0%	4.6%

Individuals With Disabilities – 9.9% of DHS, 14.9% excluding LEOs and TSA TSOs, 15.12% of the Federal Government, 12.0% EEOC Goal

The representation of individuals with disabilities continued to climb in FY 2017, rising to 9.9 percent for the permanent workforce and 14.9 percent excluding law enforcement officers and Transportation Security Officers that have physical entry requirements, compared to 5.9 percent in FY 2010. The percentage includes employees in the DHS workforce that self-identify to the agency as having a disability, all disabled veterans with a Department of Veterans Affairs (VA) disability rating of at least 30 percent, and employees appointed under a disability-based Schedule A hiring authority who did not self-identify as having a disability.

DHS employees with disabilities have separated at higher rates than their workforce participation rate in recent years, although the gap nearly closed in FY 2017. Hires reached the 12.0 percent level, and the promotion rate reached parity in FY 2017. Employees with disabilities are close to parity across the pay grades and are notably above parity in the GS 13-15 grades. Employees with disabilities are participating at a lower than expected rate at the Executive/Senior Leader level, but with a positive increasing trend over the years.

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DHS Permanent Workforce Trend for Individuals With Targeted Disabilities

Year	% of Permanent DHS Workforce	% of Hires	% of Attrition	% of Promotions	Pay Grade				
					% of Grades 1-4	% of Grades 5-9	% of Grades 10-12	% of Grades 13-15	% of Executive and Senior Leader
FY17	1.28%	1.14%	1.59%	1.08%	2.4%	1.5%	1.1%	1.3%	1.1%
FY16	1.26%	1.14%	1.72%	0.95%	2.6%	1.6%	1.1%	1.2%	0.9%
FY15	1.25%	1.05%	1.70%	0.86%	2.2%	1.6%	1.0%	1.1%	0.7%
FY14	1.25%	1.39%	1.70%	0.87%	2.0%	1.6%	1.0%	1.1%	0.8%
FY13	1.13%	1.26%	1.78%	0.89%	2.0%	1.5%	0.9%	1.0%	0.8%
FY12	1.13%	1.34%	1.64%	0.70%	2.8%	1.5%	0.9%	0.9%	0.7%
FY11	1.06%	1.19%	1.66%	0.60%	3.2%	1.4%	0.9%	0.8%	0.6%
FY10	1.02%	0.93%	1.29%	0.51%	3.2%	1.3%	0.8%	0.7%	0.8%

Individuals With Targeted Disabilities – 1.28% of DHS, 1.96% excluding LEOs and TSA TSOs,
1.12% of the Federal Government, 2% EEOC Goal

The percentage of the DHS workforce that self-identifies to DHS as having a targeted disability is lower than the average seen in the permanent federal workforce,[5] and well below the federal government goal of two percent. The participation rate has steadily climbed since FY 2010, increasing from 1.02 percent to 1.28 percent. Excluding law enforcement officers and Transportation Security Officers that have physical entry requirements, the rate is 1.96 percent.

Hire rates have slowly increased but remain below the two percent federal goal. The attrition rate is considerably above the participation rate and the hire rate. A further analysis of separations found individuals with targeted disabilities account for a higher than expected percent of retirement separations. Subtracting out retirement separations from total separations indicated that individuals with targeted disabilities account for 1.17 percent of the non-retirement separations. The non-retirement separation rate of 1.17 percent is below the participation rate of 1.28 percent.

Representation of this group in higher pay grades is at parity for the GS 13-15 grades and slightly below parity for the GS 10-12 and Executive/Senior Leader grades. Representation in promotions is below the representation rate and, like representation in higher grades, continues to trend slowly upward.

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[5] Targeted Disabilities, a subset of reportable disabilities, are considered the most severe disabilities. As a matter of policy, the federal government has initiated a special emphasis on recruiting, hiring, and retaining people with targeted disabilities. Categories on OPM's Standard Form 256 that make up targeted disabilities include: deafness, blindness, missing extremities, partial or complete paralysis, epilepsy, severe intellectual disability, psychiatric disability, and dwarfism. See http://www.opm.gov/policy-data-oversight/disability-employment/reference-materials/sf256.pdf for the form itself.

The Best Places to Work in the Federal Government

DHS has consistently administered the U.S. Office of Personnel Management (OPM) Survey between FY 2005 and FY 2017[6]. In FY 2016, after six straight years of decline, the employee engagement index increased 3 percent-from 53 percent in 2015, to 56 percent in 2016. In FY 2017, DHS continued this trend, and the employee engagement index increased 4 percent to 60 percent. In FY 2017, DHS was still below the government-wide rate of employee engagement by 7 percent. The Inclusion Index also increased 4 percent for DHS to 52 percent, however, this was still 8 percent below the government-wide rate.

The overall DHS score is largely driven by TSA and CBP employees, who account for 46.8 percent of DHS's completed surveys.[7] Some DHS Components showed higher employee satisfaction than the average, and satisfaction within Components varied greatly depending on occupation, location, job tenure, and other factors. Race and gender were not found to be great predictors of an employee's level of satisfaction. Disability status, however, was a strong predictor, as DHS employees with disabilities provided more negative responses to almost all questions in the survey.

Women in Law Enforcement

Historically, DHS relied on workforce data and did not include employee input when identifying barriers to equal employment opportunity in its workforce. In a report to Congress[8], the U.S. Government Accountability Office directed the Secretary of Homeland Security to direct the Officer for CRCL to develop a strategy to regularly include employee input from sources as the Federal Human Capital Survey and DHS's internal survey in identifying potential barriers to EEO. Consistent with that mandate, in the spring of 2014, DHS commenced a study to better understand the causes of the low female representation rate within law enforcement positions.

Notably, DHS has the largest law enforcement population in the federal government, but the lowest rate for participation by women. Women currently occupy approximately 8.4 percent of law enforcement positions at DHS. This female participation rate is substantially lower than the participation rate of women in law enforcement positions across the federal government, 15.5%[9], and even lower than that seen in the occupational CLF benchmark for criminal investigators, 12.4%.

The study, along with its findings and recommendations, was circulated throughout DHS's Components and operating divisions. It included observations and recommendations from women in law enforcement across DHS, identified perceived barriers to equal employment opportunity and diversity, provided recommendations and strategies for achieving a model workplace, and highlighted best practices from within DHS and from other federal law enforcement agencies. Because some of the recommendations related to the Federal Women's Program, implementation has occurred via Special Emphasis Programs at the various Components, particularly during Women's History Month. These programs highlight some of the challenges that women in law enforcement have faced, and how women have handled those challenges.

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[6] Commencing in 2002, the U.S. Office of Personnel Management began its Government-wide administration of the Federal Human Capital Survey (FHCS). Between 2004 and 2010, the FHCS was administered every other year. In 2010, the FHCS was renamed the Federal Employee Viewpoint Survey (FEVS). From its inception in 2010, the FEVS is administered annually.

[7] TSA and CBP employees received 55.1 percent of the surveys issued to Department employees, indicating that they had a lower rate of return than other Components.

[8] U.S. Government Accountability Office, Rep. No. GAO/RCED- 10-160T, *DHS Has Opportunities to Better Identify and Address Barriers to EEO in its Workforce, 2009*.

[9] Bureau of Justice Statistics, *Census of Federal Law Enforcement Officers, 2008.*

Data Sources

The workforce numbers used in this report were obtained using DHS's workforce data application, AXIS, and are based on an extraction from NFC's data for Pay Period 19, which ended September 30, 2017. DHS employees voluntarily submitted all race, national origin, gender, and disability data relied upon in this report. To better capture the number of individuals with disabilities, DHS identified employees who are 30 percent or more disabled veterans (as determined by the VA) or who are on a disability-based Schedule A appointment – and who did not report a disability through the self-identification process. These individuals are counted in the B series workforce tables as having a non-targeted disability. Statistics on individuals with disabilities/individuals with targeted disabilities in the federal government were obtained from the U.S. Office of Personnel Management's (OPM) 2016 Report on the Employment of Individuals with Disabilities in the Federal Executive Branch[10].

Applicant flow data presented in this study were extracted from USA Staffing, which is used by four of the nine DHS Components: CBP, Immigration and Customs Enforcement (ICE), U.S. Citizenship and Immigration Services (USCIS), and DHS HQ. The remaining five DHS Components use Monster Government Solutions or a proprietary system as their applicant flow management system. The Monster Government Solutions data are not available from a consolidated source, so only the USA Staffing applicant flow data were used for this report. DHS continues to work towards consolidating all applicant flow data.

NCLF statistics were compiled using the Census Bureau's American Community Survey data. RCLF statistics were compiled using American Community Survey data, along with the distribution of DHS personnel across occupations.

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

Conclusion

DHS leadership is proud of its accomplishments in the areas of attracting, developing, and retaining an increasingly diverse workforce. This report identified accomplishments, but also identified several challenges still requiring attention: establishing an effective career development program; establishing a retention strategy; correcting significantly high separation rates of women in the DHS workforce; and increasing the participation of individuals with disabilities and individuals with targeted disabilities. The plans in Parts I and J addresses these issues.

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[10] https://www.opm.gov/policy-data-oversight/diversity-and-inclusion/reports/disability-report-fy2015.pdf.

Part F – Certification and Signatures

CERTIFICATION of ESTABLISHMENT of CONTINUING
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS

I, Veronica Venture, Deputy Officer for Civil Rights and Civil Liberties/Director, for Equal Employment Opportunity and Diversity Programs, GS-0260-SES, am the principal Equal Employment Opportunity Director/Official for the U.S. Department of Homeland Security.

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

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

I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.
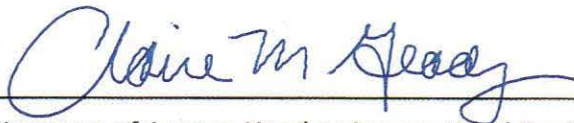
5/30/2018

Signature of Principal Equal Employment Opportunity
Director/Official
Date

Veronica Venture
Deputy Officer, Office for Civil Rights and Civil Liberties
Director, Equal Employment Opportunity and Diversity
U.S. Department of Homeland Security
Certifies that this Federal Agency Annual Equal Employment
Opportunity Program Status Report is in compliance with
Management Directive 715

JUN 0 4 2018

Signature of Agency Head or Agency Head Designee
Date

Kirstjen Nielsen
Secretary, U.S. Department of Homeland Security

Part G – Self-Assessment towards a Model EEO Program

Essential Element A: Demonstrated Commitment from Agency Leadership Requires the agency head to issue written policy statements ensuring a workplace free of discriminatory harassment and a commitment to equal employment opportunity.

PART G, Essential Element A, Section 1 - Issuance of EEO Policy Statement

Measures	Measure Met?	Comments
A.1.a. Was an EEO policy statement issued within 6 - 9 months of installation of the agency head? (Please list date of agency head installation and date of issuance in the comments column).	No	CBP and FEMA have not met this measure. CBP received an acting agency head on January 20, 2017. The new FEMA Administrator was confirmed June 2017. Neither CBP nor FEMA had issued an EEO policy statement as of the end of FY17.
A.1.b. During the current agency head's tenure, has the EEO policy statement been reissued annually?	No	ICE FEMA have not met this measure.
A.1.c. Are new employees provided a copy of the EEO policy statement during orientation?	No	FEMA has not met this measure.
A.1.d. When an employee is promoted into the supervisory ranks, is he/she provided a copy of the EEO policy statement?	No	FEMA has not met this measure.

PART G, Essential Element A, Section 2 - Communication of EEO Policy Statement

Measures	Measure Met?	Comments
A.2.a. Have the heads of subordinate reporting components communicated support of all agency EEO policies through the ranks?	Yes	
A.2.b. Has the agency made written materials available to all employees and applicants, informing them of the variety of EEO programs and administrative and judicial remedial procedures available to them?	Yes	
A.2.c. Has the agency prominently posted such written materials in all personnel and EEO offices, and on the agency's internal website? [29 C.F.R. 1614.102(b)(5)]	Yes	

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Essential Element A, Section 3 - Evaluation of Managers and Supervisors on Commitment to EEO Principles

Measures	Measure Met?	Comments
A.3.a. Are managers and supervisors evaluated on their commitment to agency EEO policies and principles?	Yes	
A.3.b. Are managers and supervisors evaluated on their commitment to resolve problems/disagreements and other conflicts in their respective work environments as they arise?	Yes	
A.3.c. Are managers and supervisors evaluated on their commitment to address concerns, whether perceived or real, raised by employees and following up with appropriate action to correct or eliminate tension in the workplace?	Yes	
A.3.d. Are managers and supervisors evaluated on their commitment to support the agency's EEO program through the allocation of mission personnel to participate in community out-reach and recruitment programs with private employers, public schools, and universities?	Yes	
A.3.e. Are managers and supervisors evaluated on their commitment to ensure full cooperation of employees under his/her supervision with EEO office officials such as EEO counselors, EEO investigators, etc.?	Yes	
A.3.f. Are managers and supervisors evaluated on their commitment to ensure a workplace that is free from all forms of discrimination, harassment, and retaliation?	Yes	
A.3.g. Are managers and supervisors evaluated on their commitment to ensure that subordinate supervisors have effective managerial communication and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications?	Yes	
A.3.h. Are managers and supervisors evaluated on their commitment to ensure the provision of requested religious accommodations when such accommodations do not cause an undue hardship?	Yes	
A.3.i. Are managers and supervisors evaluated on their commitment to ensure the provision of requested disability accommodations to qualified individuals with disabilities when such accommodations do not cause an undue hardship?	Yes	

Measures	Measure Met?	Comments
A.3.j. Have all employees been informed about what behaviors are inappropriate in the workplace and that this behavior may result in disciplinary actions? If yes, describe what means were utilized by the agency to inform its workforce about penalties for unacceptable behavior in the comments column.	Yes	Intranet and hard copy posting of policy statements, merit system principles, prohibited personnel practices; training sessions including the same.
A.3.k. Have the procedures for reasonable accommodation for individuals with disabilities been made readily available/accessible to all employees by disseminating such procedures during orientation of new employees and by making such procedure available on the World-Wide Web or Internet?	No	HQ has not met this measure.
A.3.l. Have managers and supervisors been trained on their responsibilities under the procedures for reasonable accommodation?	Yes	

Essential Element B: Integration of EEO into the Agency's Strategic Mission

Element B requires that the agency's EEO programs be organized and structured to maintain a workplace that is free from discrimination in any of the agency's policies, procedures or practices and support the agency's strategic mission.

PART G, Essential Element B, Section 1 - Reporting Structure for EEO Program

Measures	Measure Met?	Comments
B.1.a. Is the EEO Director under the direct supervision of the agency head? [See 29 C.F.R. 1614.102(b) (4)] For subordinate level reporting components, is the EEO Director/Officer under the immediate supervision of the lower level component's head official? (For example, does the Regional EEO Officer report to the Regional Administrator?)	No	CBP, FEMA, and FLETC have not met this measure.
B.1.b. Are the duties and responsibilities of the EEO officials clearly defined?	Yes	
B.1.c. Do the EEO officials have the knowledge, skills, and abilities to carry out the duties and responsibilities of their positions?	Yes	
B.1.d. If the agency has 2nd level reporting components, are there organizational charts that clearly define the reporting structure for EEO programs?	Yes	
B.1.e. If the agency has 2nd level reporting components; does the agency-wide EEO Director have authority for EEO programs within the subordinate reporting components?	Yes	
B.1.f. If no, please describe how EEO program authority is delegated to subordinate reporting components in Part H.	N/A	

PART G, Essential Element B, Section 2 - EEO Communication with Senior Leaders

Measures	Measure Met?	Comments
B.2.a. Does the EEO Director/Officer have a regular, effective means of informing the agency head and other top management of the effectiveness, efficiency, and legal compliance of the agency's EEO program?	Yes	
B.2.b. After submission of the previous Form 715, did the EEO Director/Officer present a State of the Agency briefing to the agency head and other senior officials, including a performance assessment in each of the 6 elements of the Model EEO program, and report agency progress in completing its barrier analysis – including barriers identified, eliminated, or impact reduced?	No	TSA has not met this measure.

Measures	Measure Met?	Comments
B.2.c. Are EEO officials present during agency pre-decisional deliberations regarding recruitment strategies, vacancy projections, succession planning, selections for training/career development opportunities, and other workforce changes?	No	HQ, USCIS and TSA have not met this measure.
B.2.d. Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions such as reorganizations and realignments?	No	HQ and USCIS have not met this measure.
B.2.e. Are management/personnel policies, procedures and practices examined at regular intervals to assess whether there are any hidden impediments to the realization of equality of opportunity for any group(s) of employees or applicants? [See 29 C.F.R. 1614.102(b)(3)]	No	HQ and TSA have not met this measure.
B.2.f. Is the EEO Director included in the agency's strategic planning, especially the agency's human capital plan, regarding succession planning, training, etc., to ensure that EEO concerns are integrated into the agency's strategic mission?	No	HQ and USCIS have not met this measure.

PART G, Essential Element B, Section 3 - Sufficient EEO Program Staffing

Measures	Measure Met?	Comments
B.3.a. Does the EEO Director have the authority and funding to ensure implementation of agency EEO action plans to improve EEO program efficiency and/or eliminate identified barriers to the realization of equality of opportunity?	No	ICE has not met this measure.
B.3.b. Are sufficient personnel resources allocated to the EEO Program to ensure that agency self-assessments and self-analyses prescribed by EEO MD-715 are conducted annually and to maintain an effective complaint processing system?	No	FEMA and ICE have not met this measure.
B.3.c. Are statutory/regulatory EEO-related Special Emphasis Programs sufficiently staffed?	No	FEMA has not met this measure
B.3.d. Is the Federal Women's Program sufficiently staffed - 5 U.S.C. 7201; 38 U.S.C. 4214; Title 5 C.F.R., Subpart B, 720.204?	No	FEMA has not met this measure
B.3.e. Is the Hispanic Employment Program sufficiently staffed Title 5 C.F.R., Subpart B, 720.204?	No	FEMA has not met this measure
B.3.f. Is the People With Disabilities Program Manager; Selective Placement Program for Individuals With Disabilities sufficiently staffed - Section 501 of the Rehabilitation Act; Title 5 U.S.C. Subpart B, Chapter 31, Subchapter I-3102: 5 C.F.R. 213.3102(u); 5 C.F.R. 315.709?	Yes	

Measures	Measure Met?	Comments
B.3.g. Are other agency Special Emphasis Programs monitored by the EEO Office for coordination and compliance with EEO guidelines and principles such as: FEORP - 5 C.F.R. 720; Veterans Employment Programs; Black or African American; American Indian or Alaska Native; Asian and Native Hawaiian or Pacific Islander Programs?	Yes	

PART G, Essential Element B, Section 4 - Sufficient EEO Program Funding

Measures	Measure Met?	Comments
B.4.a. Are there sufficient resources to enable the agency to conduct a thorough barrier analysis of its workforce, including the provision of adequate data collection and tracking systems?	Yes	
B.4.b. Is there sufficient budget allocated to all employees to utilize, when desired, all EEO programs, including the complaint processing program and ADR, and to make a request for reasonable accommodation? (Including subordinate level reporting components?)	Yes	
B.4.c. Has funding been secured for publication and distribution of EEO materials (e.g. Harassment policies, EEO posters, reasonable accommodations procedures, etc.)?	Yes	
B.4.d. Is there a central funding or other mechanism for funding supplies, equipment and services necessary to provide disability accommodations?	Yes	
B.4.e. Does the agency fund major renovation projects to ensure timely compliance with Uniform Federal Accessibility Standards?	Yes	
B.4.f. Is the EEO Program allocated sufficient resources to train all employees on EEO programs, including administrative and judicial remedial procedures available to employees?	Yes	
B.4.g. Is there sufficient funding to ensure the prominent posting of written materials in all personnel and EEO offices? [See 29 C.F.R. 1614.102(b)(5)]	Yes	
B.4.h. Is there sufficient funding to ensure that all employees have access to this training and information?	Yes	
B.4.i. Is there sufficient funding to provide all managers/supervisors with training and periodic updates on their EEO responsibilities for ensuring a workplace that is free from all forms of discrimination, including harassment and retaliation?	Yes	

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Measures	Measure Met?	Comments
B.4.j. Is there sufficient funding to provide all managers/supervisors with training and periodic updates on their EEO responsibilities to provide religious accommodations?	Yes	
B.4.k. Is there sufficient funding to provide all managers/supervisors with training and periodic updates on their EEO responsibilities to provide disability accommodations in accordance with the agency's written procedures?	Yes	
B.4.l. Is there sufficient funding to provide all managers/supervisors with training and periodic updates on their EEO responsibilities in the EEO discrimination complaint process?	Yes	
B.4.m. Is there sufficient funding to provide all managers/supervisors with training and periodic updates on their EEO responsibilities to participate in ADR?	Yes	

Essential Element C: Management and Program Accountability

Element C requires the Agency Head to hold all managers, supervisors, and EEO Officials responsible for the effective implementation of the agency's EEO Program and Plan.

PART G, Essential Element C, Section 1 - EEO Communication with Managers and Supervisors

Measures	Measure Met?	Comments
C.1.a. Are regular (monthly/quarterly/semi-annually) EEO updates provided to management/supervisory officials by EEO program officials?	Yes	
C.1.b. Do EEO program officials coordinate the development and implementation of EEO Plans with all appropriate agency managers to include Agency Counsel, Human Resource Officials, Finance, and the Chief Information Officer?	No	FEMA and HQ have not met this measure.

PART G, Essential Element C, Section 2 - EEO & Human Resources Collaboration and Coordination

Measures	Measure Met?	Comments
C.2.a. Have timetables or schedules been established for the agency to review its Merit Promotion Program Policy and Procedures for systemic barriers that may be impeding full participation in promotion opportunities by all groups?	No	FEMA, USCIS, and TSA have not met this measure.
C.2.b. Have timetables or schedules been established for the agency to review its Employee Recognition Awards Program and Procedures for systemic barriers that may be impeding full participation in promotion opportunities by all groups?	No	FEMA and USCIS have not met this measure.
C.2.c. Have timetables or schedules been established for the agency to review its Employee Development/Training Programs for systemic barriers that may be impeding full participation in training opportunities by all groups?	No	FEMA, USCIS, and TSA have not met this measure.

PART G, Essential Element C, Section 3 - Disciplinary Action Taken

Measures	Measures Met?	Comments
C.3.a. Does the agency have a disciplinary policy and/or a table of penalties that covers employees found to have committed discrimination?	Yes	

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Measures	Measures Met?	Comments
C.3.b. Have all employees, supervisors, and managers been informed of the penalties for being found to perpetrate discriminatory behavior or for taking personnel actions based upon a prohibited basis?	Yes	
C.3.c. Has the agency, when appropriate, disciplined or sanctioned managers/supervisors or employees found to have discriminated over the past two years? If yes, in the Comments column, cite the number found to have discriminated and list penalty/disciplinary action for each type of violation. If yes, cite the number found to have discriminated and list penalty/disciplinary action for each type of violation.	Yes	13 supervisors: 6 reprimands 1 disciplinary action 2 counseled and completed training 1 suspension 1 voluntarily demoted 2 retired
C.3.d. Does the agency promptly (within the established time frame) comply with EEOC, Merit Systems Protection Board, Federal Labor Relations Authority, labor arbitrators, and District Court orders?	No	FEMA has not met this measure.
C.3.e. Does the agency review disability accommodation decisions/actions to ensure compliance with its written procedures and analyze the information tracked for trends, problems, etc.?	No	FEMA and HQ have not met this measure.

Essential Element D: Proactive Prevention of Unlawful Discrimination

Element D requires that the Agency Head makes early efforts to prevent discriminatory actions and eliminate barriers to Equal Employment Opportunity in the workplace.

PART G, Essential Element D, Section 1 - Barrier Analysis Process

Measures	Measures Met?	Comments
D.1.a. Do senior managers meet with and assist the EEO Director and/or other EEO Program Officials in the identification of barriers that may be impeding the realization of equal employment opportunity?	No	FEMA and USCIS have not met this measure.
D.1.b. When barriers are identified, do senior managers develop and implement, with the assistance of the agency EEO office, agency EEO Action Plans to eliminate said barriers?	No	FEMA and HQ have not met this measure.
D.1.c. Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans?	No	FEMA, HQ, and USCIS have not met this measure.
D.1.d. Are trend analyses of workforce profiles conducted by race, national origin, sex, and disability?	Yes	
D.1.e. Are trend analyses of the workforce's major occupations conducted by race, national origin, sex, and disability?	Yes	
D.1.f. Are trend analyses of the workforce's grade level distribution conducted by race, national origin, sex, and disability?	Yes	
D.1.g. Are trend analyses of the workforce's compensation and reward system conducted by race, national origin, sex, and disability?	No	USCIS has not met this measure.
D.1.h. Are trend analyses of the effects of management/personnel policies, procedures and practices conducted by race, national origin, sex, and disability?	No	FEMA and USCIS have not met this measure.

PART G, Essential Element D, Section 2 - Alternative Dispute Resolution (ADR) is encouraged

Measures	Measures Met?	Comments
D.2.a. Are all employees encouraged to use ADR?	Yes	
D.2.b. Is the participation of supervisors and managers in the ADR process required?	Yes	

Essential Element E: Efficiency

Element E requires that the Agency Head ensure that there are effective systems in place for evaluating the impact and effectiveness of the agency's EEO programs as well as an efficient and fair dispute resolution process.

PART G, Essential Element E, Section 1 - Sufficient Resources to Evaluation EEO Program

Measures	Measure Met?	Comments
E.1.a. Does the EEO office employ personnel with adequate training and experience to conduct the analyses required by MD-715 and these instructions?	Yes	
E.1.b. Has the agency implemented an adequate data collection and analysis systems that permits tracking of the information required by MD-715 and these instructions?	No	FEMA, USCIS, and TSA have not met this measure.
E.1.c. Have sufficient resources been provided to conduct effective audits of field facilities' efforts to achieve a model EEO program and eliminate discrimination under Title VII and the Rehabilitation Act?	Yes	
E.1.d. Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations in all major components of the agency?	Yes	
E.1.e. Are 90% of accommodation requests processed within the timeframe set forth in the agency's procedures for reasonable accommodation?	No	CBP and ICE have not met this measure.

PART G, Essential Element E, Section 2 - Effective Complaint Tracking and Monitoring System

Measures	Measure Met?	Comments
E.2.a. Does the agency use a complaint tracking and monitoring system that allows identification of the location and status of complaints and length of time elapsed at each stage of the agency's complaint resolution process?	Yes	
E.2.b. Does the agency's tracking system identify the issues and bases of the complaints, the aggrieved individuals/complainants, the involved management officials and other information to analyze complaint activity and trends?	Yes	
E.2.c. Does the agency hold contractors accountable for delay in counseling and investigation processing times? If yes, briefly describe how.	Yes	

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Measures	Measure Met?	Comments
E.2.d. Does the agency monitor and ensure that new investigators, counselors, including contract and collateral duty investigators, receive the 32 hours of training required in accordance with EEO Management Directive MD-110?	Yes	
E.2.e. Does the agency monitor and ensure that experienced counselors, investigators, including contract and collateral duty investigators, receive the 8 hours of refresher training required on an annual basis in accordance with EEO Management Directive MD-110?	Yes	

PART G, Essential Element E, Section 3 - Timeliness in EEO Complaint Process

Measures	Measure Met?	Comments
E.3.a. Are benchmarks in place that compare the agency's discrimination complaint processes with 29 C.F.R. Part 1614?	Yes	
E.3.b. Does the agency provide timely EEO counseling within 30 days of the initial request or within an agreed upon extension in writing, up to 60 days?	No	FEMA has not met this measure.
E.3.c. Does the agency provide an aggrieved person with written notification of his/her rights and responsibilities in the EEO process in a timely fashion?	Yes	
E.3.d. Does the agency complete the investigations within the applicable prescribed time frame?	No	FEMA and ICE have not met this measure.
E.3.e. When a complainant requests a final agency decision, does the agency issue the decision within 60 days of the request?	No	See explanation in associated Part H.
E.3.f. When a complainant requests a hearing, does the agency immediately upon receipt of the request from the EEOC AJ forward the investigative file to the EEOC Hearing Office?	No	FEMA has not met this measure.
E.3.g. When a settlement agreement is entered into, does the agency timely complete any obligations provided for in such agreements?	Yes	
E.3.h. Does the agency ensure timely compliance with EEOC AJ decisions which are not the subject of an appeal by the agency?	Yes	

PART G, Essential Element E, Section 4 - Efficient and Fair ADR Process

Measures	Measure Met?	Comments
E.4.a. In accordance with 29 C.F.R. 1614.102(b), has the agency established an ADR Program during the pre-complaint and formal complaint stages of the EEO process?	Yes	
E.4.b. Does the agency require all managers and supervisors to receive ADR training in accordance with EEOC (29 C.F.R. Part 1614) regulations, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR?	Yes	
E.4.c. After the agency has offered ADR and the complainant has elected to participate in ADR, are the managers required to participate?	Yes	
E.4.d. Does the responsible management official directly involved in the dispute have settlement authority?	No	CBP, ICE, and USSS have not met this measure.

PART G, Essential Element E, Section 5 - Effectiveness of EEO Data Collection Systems

Measures	Measure Met?	Comments
E.5.a. Does the agency have a system of management controls in place to ensure the timely, accurate, complete and consistent reporting of EEO complaint data to the EEOC?	Yes	
E.5.b. Does the agency provide reasonable resources for the EEO complaint process to ensure efficient and successful operation in accordance with 29 C.F.R. 1614.102(a) (1)?	No	ICE has not met this measure.
E.5.c. Does the agency EEO office have management controls in place to monitor and ensure that the data received from Human Resources is accurate, timely received, and contains all of the required data elements for submitting annual reports to the EEOC?	No	TSA has not met this measure.
E.5.d. Do the agency's EEO programs address all of the laws enforced by the EEOC?	Yes	
E.5.e. Does the agency identify and monitor significant trends in complaint processing to determine whether the agency is meeting its obligations under Title VII and the Rehabilitation Act?	Yes	

Measures	Measure Met?	Comments
E.5.f. Does the agency track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD-715 standards?	No	FEMA and TSA have not met this measure.
E.5.g. Does the agency consult with other agencies of similar size on the effectiveness of their EEO programs to identify best practices and share ideas?	Yes	

PART G, Essential Element E, Section 6 - Elimination of Conflict of Interest with Legal Defense Function

Measures	Measure Met?	Comments
E.6.a. Are legal sufficiency reviews of EEO matters handled by a functional unit that is separate and apart from the unit which handles agency representation in EEO complaints?	Yes	
E.6.b. Does the agency discrimination complaint process ensure a neutral adjudication function?	Yes	
E.6.c. If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints?	Yes	

Essential Element F: Responsiveness and Legal Compliance

Element F requires that federal agencies are in full compliance with EEO statutes and EEOC regulations, policy guidance, and other written instructions.

PART G, Essential Element F, Section 1 - Timely Compliance with Administrative Judge Orders

Measures	Measure Met?	Comments
F.1.a. Does the agency have a system of management control to ensure that the agency officials timely comply with any orders or directives issued by EEOC Administrative Judges?	Yes	

PART G, Essential Element F, Section 2 - Timely Completion of Ordered Corrective Action

Measures	Measure Met?	Comments
F.2.a. Does the agency have control over the payroll processing function of the agency? If yes, answer the two questions below.	Yes	
F.2.b. Are there steps in place to guarantee responsive, timely, and predictable processing of ordered monetary relief?	Yes	
F.2.c. Are procedures in place to promptly process other forms of ordered relief?	Yes	

PART G, Essential Element F, Section 3 - Staff Accountability for Legal Compliance

Measures	Measure Met?	Comments
F.3.a. Is compliance with EEOC orders encompassed in the performance standards of any agency employees? If yes, please identify the employees by title in the comments column, and state how performance is measured.	Yes	Included in management official performance plans.
F.3.b. Is the unit charged with the responsibility for compliance with EEOC orders located in the EEO office? If no, please identify the unit in which it is located in the	Yes	
F.3.c. Have the involved employees received any formal training in EEO compliance?	Yes	
F.3.d. Does the agency promptly provide the EEOC Attorney Fee documentation for completing compliance, such as a copy of the check issued for attorney fees and/or a narrative statement by an appropriate agency official, or agency payment order dating the dollar amount of attorney fees paid?	Yes	

Measures	Measure Met?	Comments
F.3.e. Does the agency promptly provide the EEOC awards documentation for completing compliance, such as a narrative statement by an appropriate agency official stating the dollar amount and the criteria used to calculate the award?	Yes	
F.3.f. Does the agency promptly provide the EEOC documentation of back pay and interest for completing compliance, such as computer printouts or payroll documents outlining gross back pay and interest, copy of any checks issued, or narrative statement by an appropriate agency official of total monies paid?	Yes	
F.3.g. Does the agency promptly provide the EEOC documentation regarding compensatory damages for completing compliance, such as the final agency decision and evidence of payment, if made?	Yes	
F.3.h. Does the agency promptly provide the EEOC training documentation for completing compliance, such as the attendance roster at training session(s), or a narrative statement by an appropriate agency official confirming that specific persons or groups of persons attended training on a certain date?	Yes	
F.3.i. Does the agency promptly provide the EEOC personnel action documentation for completing compliance (e.g., reinstatement, promotion, hiring, reassignment), such as copies of SF-50s?	Yes	
F.3.j. Does the agency promptly provide the EEOC documentation of the posting of Notice of Violation for completing compliance, such as the original, signed and dated Notice, reflecting the dates of posting? (A copy will suffice if original is not available.)	Yes	
F.3.k. Does the agency promptly provide the EEOC documentation of supplemental investigations, such as: (1) a copy of the letter to complainant acknowledging receipt from the EEOC of a remanded case; (2) a copy of the letter to complainant transmitting the Report of Investigation (not the ROI itself, unless specified); and (3) a copy of the request for a hearing (complainant's request or agency's transmittal letter)?	Yes	
F.3.l. Does the agency promptly provide the EEOC the Final Agency Decision (FAD) or a copy of the complainant's request for a hearing?	Yes	
F.3.m. Does the agency promptly provide the EEOC documentation of restoration of leave, such as a printout or statement identifying the amount of leave restored, if applicable? If no, provide an explanation or statement in the comments column.	Yes	

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Measures	Measure Met?	Comments
F.3.n. Does the agency promptly provide the EEOC documentation of civil actions, such as a complete copy of the civil action complaint demonstrating the same issues raised as in compliance matter?	Yes	
F.3.o.Does the agency promptly provide the EEOC with settlement agreements, such as the signed and dated agreement with specific dollar amounts, and appropriate documentation of the relief provided?	Yes	

Part H – EEO Plans for Attaining the Essential Elements of a Model EEO Program

Part H.1 – Embrace Best Practices in Equal Employment Opportunity Leadership

Model Program Essential Element	Brief Description of Program Deficiency
	Specific deficiencies identified by at least one DHS Component:
Element A – Demonstrated Commitment from Agency Leadership	A.1.a. Was EEO policy statement issued within 6 - 9 months of installation of Agency Head? A.1.b. During current Agency Head's tenure, has EEO policy statement been re-issued annually? A.1.c. Are new employees provided a copy of the EEO policy statement during orientation? A.1.d. When an employee is promoted into the supervisory ranks, is he/she provided a copy of the EEO policy statement? A.3.k. Have the procedures for reasonable accommodation for individuals with disabilities been made readily available/accessible to all employees by disseminating such procedures during orientation of new employees and by making such procedure available on the World Wide Web or Internet?
Program Deficiency Analysis:	Lack of consistent communication regarding the Equal Employment Opportunity policies and program procedures.
Objective:	Employ the EEO Council and working group members to clarify and revise communications and actions from the senior leadership to ensure that knowledge of leadership commitment to Equal Employment Opportunity is spread throughout DHS.
Responsible Officials:	OCHCO; CRCL; DHS Components
Date Objective Initiated:	March 30, 2008
Target Date for Completion of Objective:	Revised to September 30, 2017

Planned Activities Toward Completion of Objective

Planned Activities	Target Date	Completed?	Completion Date
1. OCHCO and CRCL will work jointly with DHS Components to develop a communication, marketing, and education strategy for senior leadership that consistently articulates the link between equal employment opportunity and DHS's mission.	9/30/2011 Revised to 9/30/2012	Yes	9/21/2012
2. Components will develop and provide executives and managers with necessary training, tools, and resources to leverage diversity.	Annually starting 9/30/2012	Yes	9/30/2012

3. DHS EEO offices will provide updates to EEO policies and will communicate these updates to managers, supervisors, and employees. This communication includes distribution to new employees during orientation.	9/30/2015	Yes	9/30/2015
4. Human Capital Officials will establish protocol to provide EEO offices with names of employees promoted to supervisory positions in support of the requirement to communicate current EEO policies to newly appointed supervisors with 45 days of appointment.	Revised to 9/30/2017	Yes	9/30/2017
5. Ensure that DHS Leadership communicates EEO polices throughout DHS Components that will be cascaded throughout the organization	Revised to 9/30/2016	Yes	9/30/2016
6. Make the procedures for requesting reasonable accommodation and religious accommodations available/accessible to all employees by disseminating during orientation and during staff meetings.	9/30/2015	Yes	9/30/2015
7. Issue and promote the FY 2016 DHS-wide Hiring Goals for Veterans and Individuals with Disabilities.	3/31/2016	Yes	1/05/2016

REPORT OF ACCOMPLISHMENTS AND MODIFICATIONS TO OBJECTIVE
Modifications:

The description of the identified deficiencies has been modified based on the consolidated results of the FY 2017 Component Self-Assessment towards a Model EEO Program results. A.1.a and A.1.b are the only new deficiencies that involve three or more Components. Both deficiencies are related to the changes to agency leadership that occurred in FY 2017. All Components reporting these deficiencies have clear plans in place to address the deficiencies.

All seven planned activities have been completed. DHS is closing out this Part H.

FY 2017 Update:

Activity #4, the last remaining incomplete activity from FY 2016, was completed in FY 2017.

Activity #1 – Completed 9/30/2012

Activity #2 – Completed 9/30/2012 – *Continues Annually*

Activity #3 – Completed 9/30/2015 – *Continues Annually*

Activity #4 – Completed 9/30/2017 – *Continues Annually*

DHS (OCHCO) reported the New Employee Orientation (NEO) list for the National Capital Region was released every two weeks. Supervisors were identified with a red "2" in the position column. Also, as of December 2016, the Business Analytics Team in Human Capital Resources Management provided names of all recently assigned supervisors to the MD-715 point of contact.

Activity #5 Completed 9/30/2016 – *Continues Annually*

As of the end of FY 2015, all Components reported that EEO Policies, including information on Reasonable Accommodations, are provided to all employees in a variety of formats including intranet, email distribution, postings, and hard copy.

Activity #6 – Completed 9/30/2015 – *Continues Annually*

As of the end of FY 2014, all Components reported that EEO Policies, including information on Reasonable Accommodations, are provided during new employee orientation.

Activity #7 – Completed 1/05/2016 – *Continues Annually*

The Office of the Chief Human Capital Officer (OCHCO) issued FY 2017 hiring goals for veterans, disabled veterans, Individuals with Disabilities and Individuals with Targeted disabilities. In addition, CRCL and OCHCO collaborated and developed the Disability Employment Fact Sheet outlining a Model EEO Program for Individuals with Disabilities. The Fact Sheet also included the DHS Hiring Goals for Individuals with Disabilities.

Component Updates

Included by reference to Component/sub-agency MD-175 reports, per EEOC guidance.

Part H.2 – Ensure Management and Program Accountability

Model Program Essential Element	Brief Description of Program Deficiency
Element C – Management and Program Accountability	Specific deficiencies identified by at least one DHS Component: C.1.b. Do EEO program officials coordinate the development and implementation of EEO Plans with all appropriate agency managers to include Agency Counsel, Human Resource Officials, Finance, and the Chief Information Officer? C.2.a. Have time-tables or schedules been established for the agency to review its Merit Promotion Program Policy and Procedures for systemic barriers that may be impeding full participation in promotion opportunities by all groups? C.2.b. Have time-tables or schedules been established for the agency to review its Employee Recognition Awards Program and Procedures for systemic barriers that may be impeding full participation in promotion opportunities by all groups? C.2.c. Have time-tables or schedules been established for the agency to review its Employee Development/Training Programs for systemic barriers that may be impeding full participation in training opportunities by all groups? C.3.d. Does the agency promptly (within the established time frame) comply with EEOC, Merit Systems Protection Board, Federal Labor Relations Authority, labor arbitrators, and District Court orders? C.3.e. Does the agency review disability accommodation decisions/actions to ensure compliance with its written procedures and analyze the information tracked for trends, problem, etc.?
Program Deficiency Analysis:	Many standard human resources policies were outdated or had never been issued; there was no cost-benefit analysis of recruitment efforts; there was no systemic implementation of reasonable accommodation policies; and human resources and EEO offices were often not coordinating closely.
Objective:	Create accountability for all managers, supervisors, and EEO officials and personnel officers for the effective implementation and management of the DHS EEO program.
Responsible Officials:	OCHCO; CRCL; DHS Components
Date Objective Initiated:	March 30, 2008
Target Date for Completion of Objective:	Revised to September 30, 2017

Planned Activities Toward Completion of Objective

Planned Activities	Target Date	Completed?	Completion Date
1. Develop DHS-wide guidance to ensure that job announcements provide information about the kinds of assessments that will be used to evaluate candidates. Ensure that all assessment tools used for any purpose have been reviewed for cultural barriers.	9/30/2011 Revised to 9/30/2013	Yes	9/30/2013

This does not mean that the assessment tools should not be used, but that they should be sufficiently robust in content and measurement to not penalize groups for cultural reasons.				
2. Revise and update Reasonable Accommodation Procedures	9/30/2011	Yes	9/30/2013	
3. Follow up with the components on the status of their Reasonable Accommodation Procedures.	9/30/2011	Yes	9/30/2013	
4. Establish timetables to review the Merit Promotion Program and Procedures for systemic barriers.	Revised to 9/30/2017	Yes	6/8/2017	
5. Establish timetables to review its Employee Recognition Awards Program and Procedures for systemic barriers that may be impeding full participation in the program by all groups.	Revised to 9/30/2017	Yes	6/8/2017	
6. Establish timetables to review Employee Development/Training Program policies and applicant process for systemic barriers that may impede any group from obtaining equal opportunity for employment.	Revised to: 9/30/2017	Yes	6/8/2017	
7. EEO practitioners will assess the work climate to ensure that employees who have been found to have caused discrimination be held accountable. Discussion around the topic will be incorporated with Complaints Management and Adjudication Section Component briefings and updates.	12/30/2014	Yes	9/30/2015	
8. The Disability Program Managers will meet with managers and supervisors to discuss the Reasonable Accommodation Policy and the processing of accommodation requests.	12/30/2015	Yes	9/30/2015	
9. EEO practitioners/staff members will meet with managers and supervisors to emphasize the importance of hiring, developing and retaining, and effectively communicating with employees. Discussions will include review of workforce demographic, complaint activity and use of alternative dispute resolution.	6/30/2015	Yes	9/30/2015	

REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE

Modifications

The description of the identified deficiencies has been modified based on the consolidated results of the FY 2017 Component Self-Assessment towards a Model EEO Program results. There were no new deficiencies reported by three or more Components. All Components reporting these deficiencies have clear plans in place to address the deficiencies.

The remaining activities have been completed from the DHS level perspective. DHS closes out this Part H.

FY 2017 Update

Following the EEOC Technical Assistance Visit in January, 2017, DHS surveyed all DHS Components for response on all unmet Part G measures. DHS then conducted a follow-up conference with DHS Components on

all unmet Part G measures with special emphasis on C.2.a, b, and c. DHS provided a forum for Components that have met these measures to share strategies and tactics with Components that had not met these measures.

A review of DHS Component FY 2017 Part G's indicates that TSA, USCIS, and FEMA are the only Components reporting not met on these measures.

✓ TSA reports the timetables have been completed in TSA's Part H.

✓ USCIS created a new Part H and plans to have timetables established by 3/31/18.

✓ FEMA is aware of the deficiency, but has experienced unprecedented resource drain due to the need to provide extensive disaster relief in FY 2017. FEMA is strengthening its efforts to proactively work through MD-715 deficiencies throughout fiscal year 2018. FEMA has modified its target dates with a goal to demonstrate meaningful progress in FY 2018.

 There are no further DHS activities related to this Part H.

Activity #1 - Completed 9/30/2013

Activity #2 - Completed 9/30/2013

Activity #3 – Completed 9/30/2013

Activities #4 – Completed 6/8/2017

Activity #5 – Completed 6/8/2017

Activity #6 – Completed 6/8/2017

Activity #7 - Completed 9/30/2015

Activity #8 - Completed 9/30/2015

Activity #9 - Completed 9/30/2015

Component Updates

Included by reference to Component/sub-agency MD-715 reports, per EEOC guidance.

Part H.4– Ensure Sufficiency of Data/Document Collection or Analysis

Model Program Essential Element	Brief Description of Program Deficiency
Element E – Efficiency	Specific deficiencies identified by at least one DHS Component: E.1.b. Has the agency implemented an adequate data collection and analysis system that permits tracking of the information required by MD-715 and these instructions? E.1.e. Are 90% of accommodation requests processed within the time frame set forth in the agency's procedures for reasonable accommodation? E.3.b. Does the agency provide timely EEO counseling within 30 days of the initial request or within an agreed upon extension in writing up to 60 days? E.3.d. Does the agency complete the investigations within the applicable prescribed time frame? E.3.e. When a complaint requests a final agency decision, does the agency issue the decision within 60 days of the request? E.3.f. When a complainant requests a hearing, does the agency immediately upon receipt of the request from the EEOC AJ forward the investigative file to the EEOC Hearing Office? E.4.d. Does the responsible management official directly involved in the dispute have settlement authority? E.5.b. Does the agency provide reasonable resources for the EEO complaint process to ensure efficient and successful operation in accordance with 29 C.F.R. 1614.102(a)(1)? E.5.c.-Does the agency EEO office have management controls in place to motor and ensure that the data received from Human Resources is accurate, timely received, and contains all of the required data elements for submitting annual reports to the EEOC? E.5.f. Does the agency track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD-715 standards?
Program Deficiency Analysis:	Lack of resources and trend analyses of workforce conducted by race, national origin, sex, and disability. Lack of resources to timely investigate EEO complaints.
Objective:	Expand and clarify the data collection process in order to allow DHS to perform accurate and comprehensive analyses in the future.

Responsible Officials:	Deputy Officer & Director of Equal Employment Opportunity and Diversity; Chief Human Capital Officer
Date Objective Initiated:	March 30, 2008
Target Date for Completion of Objective:	Revised to September 30, 2019

Planned Activities Toward Completion of Objective

Planned Activities	Target Date	Completed?	Completion Date
1. Develop DHS-wide automated system to capture career development programs. (Table A/B12 - Participation in Career Development).	9/30/2019	No	
2. Coordinate with DHS Components to develop supplemental internal controls regarding timeliness of investigations.	9/30/2013	Yes	9/30/2013
3. Coordinate with DHS Components to develop streamlined review processes to expedite issuance of Reports of Investigation.	9/30/2013	Yes	9/30/2013
4. Coordinate barrier analyses across Components through the EEO Director's Council, which implements the EEOD Strategic plan and activities	Revised to 9/30/2017	Yes	9/30/2017
5. Provide MD-715 Training to ensure compliance and to ensure the document serves as a useful resource for managers/supervisors.	9/30/2016	Yes	9/30/2016
6. Develop a brochure to promote the use of alternative resolutions to address workplace disputes and issues.	Revised to 9/30/2018	No	
7. Develop a multi-year plan to issue final agency decisions within 60 days in accordance with EEOC regulations.	9/30/2019	No	

REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE

Modifications:

A description of the identified deficiencies has been modified based on the consolidated results of the FY 2017 Component Self-Assessment towards a Model EEO Program, resulting in Component compliance with 93.4 percent of the measures, as compared to 93.1 percent during FY 2016.

Activity 4 was modified to use the DHS EEO Council instead of the DHS Special Emphasis Program framework to coordinate DHS-wide barrier analyses.

Activity 6 was modified to extend the due date. ADR brochure was drafted and is awaiting final approval.

FY 2017 Update

Of the seven planned activities, DHS has completed four and a fifth is awaiting final approval (Alternate Dispute Resolution Brochure to promote the use of alternative resolutions to address workplace disputes and issues).

DHS timely submitted both the annual 462 Report and the annual No FEAR Act report.

CRCL launched the Report of Investigation (ROI) Feedback Tool. The purpose of the Feedback Tool is to provide objective assessments regarding the quality of the Components' EEO investigations.

DHS conducted basic and advanced barrier analysis training for EEO staff across DHS. Both courses were attended by representatives from all Components, and the feedback regarding the course was positive.

Activity #1

OCHCO will identify qualifying career development programs at DHS and courses that support those programs. Using data from our talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes, DHS will produce a report in compliance with MD-715.

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. Throughout FY 2018 and FY 2019, DHS is seeking follow-on capability to PALMS and will consider MD-715 requirements in the program's acquisition life cycle.

Activity #2, #3: Completed 9/30/2013 – *Continues annually*

With regard to Activity #3, CRCL launched the ROI Feedback Tool, the purpose of which is to provide objective assessments regarding the quality of the Components' EEO investigations. CRCL shared its methodology for assessing ROI quality with all Components, including providing a training workshop at the Inaugural EEO and Diversity Conference in September 2016. Feedback was provided to Components on a quarterly basis, with the intent that the feedback be used by Components to improve the quality of their ROIs and sufficiency reviews.

CRCL led the development and establishment of a Management Directive on the EEO ADR Program, which was issued on December 12, 2016. Every Component was briefed on the program; documents were reviewed by DHS EEO Council and DHS leadership. The ADR Directive ensures that managers and supervisors participate in the mediation process and do so in good faith.

Activity#4: Completed 9/30/2017 – *Barrier analysis continues*

To implement the EEO Strategic Plan, DHS's EEO Council formed working groups. CRCL DMS led the group tasked with leveraging EEO data DHS-wide to conduct a comprehensive trigger analysis. The trigger analysis included reviewing workforce statistics for each DHS Component and reviewing all Component

Parts I and J from FY 2012-2016 MD-715 reports. The report identified all triggers and tabulated triggers across the Components. Triggers more common to DHS Components were: 1) less than expected representation of multiple Ethnicity and Race Indicators (ERI) groups and women at higher pay grades, 2) overall lower than expected rate of participation of women, and 3) lower than expected rate of participation of IWD and IWTD. The group observed that Component Parts I and J included the most significant triggers relevant to each Component. The group is exploring with the full DHS EEO Council the efficacy of establishing cross-Component barrier analysis teams to further explore the common triggers.

CRCL conducted a DHS-wide study on women in law enforcement. The report on the study, which included findings, and recommendations, was circulated throughout DHS Components and operating divisions. The report conveyed the observations and recommendations of women in law enforcement across DHS; identified perceived barriers to EEO and diversity; provided recommendations and strategies to achieve a model workplace; and highlighted best practices from within DHS and from other federal law enforcement agencies. Because some of the recommendations relate to the Federal Women's Program, implementation has occurred via Special Emphasis Programs at the various Components, particularly during Women's History Month. These programs highlight some of the challenges that women in law enforcement faced, and how women have managed the challenges.

In addition, CRCL DMS, in coordination with the DHS EEO Council Strategic Plan Working Group on Department-wide Special Emphasis Program management, conducted Basic and Advanced barrier analysis training for DHS EEO professionals with MD-715 and data management responsibilities.

Activity #5: *Completed 9/30/2016*
DMS completed the EEOC MD-715 FY 2016 Agency Self-Assessment Checklist, which identified areas requiring improvement to achieve a Model EEO Program. DMS held quarterly Component meetings that included reviews and discussions of the MD-715 Model EEO program report; Special Emphasis Programs; Disability Employment Program; statistical reports; and emerging guidance, regulations, and program requirements.

In addition, CRCL convened nearly 280 DHS EEO and Diversity professionals from across the country at the DHS Inaugural EEO and Diversity Training Conference in Washington, DC, in September, 2016. Expert DHS and Federal partner leaders addressed core competencies in the field of EEO and Diversity, via 20 cutting-edge seminars and plenary sessions. EEO and Diversity practitioners from all DHS Components attended workshops on a myriad of topics, including barrier analysis, disability protocols and reasonable accommodation. The EEO and Diversity Training Conference included a track for EEO Counselors and EEO Investigators that allowed them to meet their yearly training requirements.

In FY 2016, CRCL partnered with OCHCO Diversity and Inclusion staff and the Office of Human Capital Data Analytics to provide training and guidance to Component level EEO and HR Professionals. The training included the data systems available to support MD-715 reporting requirements specifically DHS's Business Intelligence system powered by AXIS, NFC Insight, and USA Staffing Cognos.

Activity #6: *Revised Completion Date 9/30/2017*

DHS released its EEO ADR Program Directive Number 065-04 on December 12, 2016. The Directive states that full participation by managers and supervisors in ADR is required. A DHS ADR brochure was prepared, is under review, and is expected to be published in FY 2017.

CRCL continues to lead the DHS ADR Manager's Council. Each Component, along with the OCHCO, is represented on the Council. The ADR Council oversees the effectiveness of the DHS ADR Shared Neutrals program, establishes certification for mediators on the shared neutrals roster, and provides oversight for the cadre of collateral duty mediators.

During FY 2016, the DHS ADR program added 22 mediators to the ADR Shared Neutrals Roster bringing the roster total to 54 collateral duty mediators. Two 90 minute refresher trainings were held, via webinar, for the mediators on the shared neutrals roster. The DHS ADR Shared Neutrals Program saw a 50 percent increase in the use of the mediators. This increased use of the Shared Neutrals resulted in a significant cost savings to the DHS.

Activity #7

During FY 2017, CMAS issued or administratively closed 822 final agency actions, including 405 merit FADs. The EEOC Regulations, at 29 C.F.R. Part 1614, requires merit FADs to be issued within 60 days of election of, or failure to elect a FAD. Upon completion of the investigation in a mixed case complaint, a final decision will be issued within 45 days without a hearing. DHS had a performance measure goal to issue 40 percent of merit FADs by the regulatory due date. For reasons directly related to diminished CMAS resources throughout the fiscal year and an increased volume of incoming FAD requests, CRCL did not meet its goal and timely issued 26 percent of merit FADs. Further, CMAS amassed an inventory of pending merit FADs during the year and, as a result, approached the situation strategically, striking a balance between issuing regulatory timely FADs while also not disadvantaging complainants whose cases could not be issued by the regulatory date, either due to late receipt within CRCL or as a result of CMAS's temporarily diminished resources. To further address the growing inventory, CRCL leadership approved funding for contract support for the drafting of merit FADs. The contract was approved in late fourth quarter of FY 2017 and is expected to have a positive impact on the issuance of merit FADs in FY 2018. At the conclusion of FY 2017, CMAS was again fully resourced with analysts and support staff.

Component Updates

Included by reference, per EEOC guidance.

Part I – EEO Plans To Eliminate Identified Barriers

Part I.1 – Lower Than Expected Participation

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue.	Women and several ethnic and racial groups have lower than expected participation rates in the overall workforce, and low hiring rates for certain major occupations, when compared to the RCLF.
How was the condition recognized as a potential barrier?	A review of workforce data indicates women and several ethnic and racial groups are below the RCLF percentage, and the federal average and DHS hiring goals, respectively.
BARRIER ANALYSIS: Provide a description of the steps taken and data analyzed to determine cause of the condition.	Workforce data are analyzed at the DHS level, at the Component level, and by major occupations. Applicant flow data became available for all DHS Components in FY 2014, and are also being used to assess the cause of the observed disparities.
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.	Representation is driven by past hires, current recruitment, current staffing, retirement, and resignations. It appears that many of the racial disparities between the DHS workforce and the NCLF or National RCLF are due to the geographic location of the jobs. The barrier leading to gender disparity has not yet been fully identified. It is expected that the study on women in law enforcement positions at DHS conducted in FY 2014 will provide insight into why females participate in lower than expected rates in DHS law enforcement positions.
OBJECTIVE: State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.	For total workforce participation/new hires: Develop and implement an MD-715 data system and an applicant data tracking system; develop needed data tools; analyze data carefully; develop remediation plans; and monitor closely. For major occupations: Increase outreach methods using news media.
RESPONSIBLE OFFICIAL:	OCHCO; CRCL; DHS Components
DATE OBJECTIVE INITIATED:	February 1, 2011
TARGET DATE FOR COMPLETION OF OBJECTIVE:	All planned activities were completed in FY 2017 and relevant MOC related Part I's are included in Component MD-715 reports. DHS closed out this Part I in FY 2017.

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PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE	TARGET DATE

1. CRCL will identify Ethnicity Race Indicator/Gender groups participating at a lower than expected rate compared to the RCLF for occupations over 100, including major/mission critical occupations.

    Track and report net change quarterly.

1. Quarterly beginning 6/30/2011

    Revised Target Date: Quarterly, beginning 6/30/2017

2. DHS Components and facilities will research where to conduct outreach for these groups in occupations with underrepresentation.
    a. Identify community colleges, colleges and universities with substantial populations of underrepresented groups, including: Historically Black Colleges and Universities; American Indian and Alaska Native Education; Hispanic Serving Institutions; and all-female colleges and universities in appropriate majors for underrepresented occupations.
    b. Identify relevant job fairs in the service area.
    c. Identify focused media outlets to supplement national recruitment with local outreach.
    d. Identify relevant local affinity groups and community groups for Special Emphasis Program managers to visit.
    e. Conduct focus group meetings with employees from underrepresented groups to determine how to improve recruitment and retention.
    f. Establish coordination with other Components regarding recruitment.
    g. Report Component recruitment needs to OCHCO.

2. Completed in FY 2012 and continues.
    a) Annually

    b) Annually
    c) Annually

    d) Annually

    e) Annually, with six-month progress reviews

    f) Annually

    g) Annually

3. OCHCO will implement a multi-year plan (beyond national posting) for targeted recruitment of applicants from the groups participating at a lower than expected rate in these occupations. (DHS Workforce Strategy Objective 2.2: Develop a collaborative, targeted recruitment strategy to promote public service and to ensure outreach to diverse populations.)

    As appropriate, update goals annually for:
    - Intern programs
    - Job fairs
    - Local advertising
    - Contacts with affinity and community organizations
    - Coordination on recruitment efforts

3. Annually, beginning 9/30/2011 Completed in 2012 and continues for goal updates and six-month progress reviews of plan implementation outcomes.

4. OCHCO will produce a plan to develop an applicant data tracking system, with at least three benchmarks per year.

    a. Conduct pilot with USA Staffing.
    b. Acquire data from Monster Government Solutions.
    c. Integrate data analysis into DHS component barrier analysis.

    a) 7/31/2015
    b) 9/30/2016
    c) 9/30/2016
    Data acquired in 2014, analysis is ongoing.

5. OCHCO will continue to use and promote DHS's enterprise-wide solutions to DHS-wide recruitment to:
    - Access DHS-wide recruitment activities
    - Coordinate DHS-wide participation in recruitment events
    - Develop DHS-wide recruitment strategies and activities for cross-cutting occupations

    Quarterly, beginning 6/30/2011 Completed in FY 2011 and continues. Quarterly progress reports.

6. DHS Components will use the following recruitment programs, as applicable, to increase the number of minority and female candidates applying for positions suitable for external recruitment:

    - Hispanic Association of Colleges and Universities Internship Program
    - Minority Serving Institution Internship Program
    - Presidential Management Fellows
    - (USCIS) Summer Intern Enrichment Program
    - U.S. Office of Personnel Management's Pathway for Students and Recent Graduates Program
    - (TSA) Resident Program
    - Tuition Assistance Program
    - Workforce Recruitment Program for College Students with Disabilities
    - American University's Washington Internships for Native Students
    - American Association of People with Disabilities Federal Information Technology Internship Program
    - Bender Consulting Register
    - Establish hiring goals for use of Schedule A.

    Annually, beginning 3/31/2011 Completed in FY 2012, continues annually.

7. DHS Components will conduct an assessment to identify any occupations that may require bilingual or bicultural capabilities and include findings and activities.

    Annually, beginning 3/31/2011 Completed in FY 2012, continues annually.

8. DHS Components will conduct an assessment of the following and report any action items:

    - Immediate and longer range job openings for each occupational grade-level grouping for which underrepresentation has been determined
    - Hiring authorities which may be used to fill such jobs
    - The possible impact of its actions on underrepresentation

    Annually, beginning 3/31/2011 Completed in FY 2012 and continues.

REPORT OF ACCOMPLISHMENTS AND MODIFICATIONS TO OBJECTIVE

Activity #1

OCHCO modified planned activity to streamline areas of focus to the major occupational categories identified on Workforce Data Table A6. The groups marked with an asterisk (*) had lower than expected permanent workforce participation when compared to the relevant civilian labor force and/or the occupational civilian labor force:

Major Occupational Categories	Workforce Participation Rate	Occupational CLF	Relevant CLF
1802-Compliance, Inspection, and Support			
Hispanic Males	13.47%	4.37%	4.76%
Hispanic Females	9.71%	4.33%	4.02%
White Males*	26.49%	41.05%	43.47%
White Females*	16.80%	32.18%	30.55%
Black Males	11.10%	4.26%	4.71%
Black Females	13.59%	6.89%	6.21%
Asian Males	4.15%	2.89%	2.62%
Asian Females*	1.86%	2.11%	1.98%
Native Hawaiian/Pacific Islander Males	0.59%	0.05%	0.05%
Native Hawaiian/Pacific Islander Females	0.52%	0.10%	0.08%
American Indian/Alaska Native Males*	0.52%	0.63%	0.60%
American Indian/Alaska Native Females*	0.44%	0.52%	0.47%
Two or More Races Males	0.42%	0.31%	0.26%
Two or More Races Females	0.33%	0.30%	0.23%
1801-General Inspection, Investigative Enforcement and Compliance			
Hispanic Males	13.21%	4.37%	4.76%
Hispanic Females	4.74%	4.33%	4.02%
White Males	46.43%	41.05%	43.47%
White Females*	14.83%	32.18%	30.55%
Black Males	7.68%	4.26%	4.71%
Black Females*	4.88%	6.89%	6.21%
Asian Males	3.98%	2.89%	2.62%
Asian Females	2.40%	2.11%	1.98%
Native Hawaiian/Pacific Islander Males	0.24%	0.05%	0.05%
Native Hawaiian/Pacific Islander Females	0.11%	0.10%	0.08%
American Indian/Alaska Native Males	0.79%	0.63%	0.60%
American Indian/Alaska Native Females*	0.28%	0.52%	0.47%
Two or More Races Males*	0.25%	0.31%	0.26%

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Two or More Races Females*	0.18%	0.30%	0.23%
1895-Customs and Border Protection Officers			
Hispanic Males	24.56%	4.37%	4.76%
Hispanic Females	6.55%	4.33%	4.02%
White Males	43.75%	41.05%	43.47%
White Females*	8.33%	32.18%	30.55%
Black Males	5.68%	4.26%	4.71%
Black Females*	2.28%	6.89%	6.21%
Asian Males	5.75%	2.89%	2.62%
Asian Females*	1.13%	2.11%	1.98%
Native Hawaiian/Pacific Islander Males	0.46%	0.05%	0.05%
Native Hawaiian/Pacific Islander Females	0.10%	0.10%	0.08%
American Indian/Alaska Native Males	0.68%	0.63%	0.60%
American Indian/Alaska Native Females*	0.16%	0.52%	0.47%
Two or More Races Males	0.41%	0.31%	0.26%
Two or More Races Females*	0.17%	0.30%	0.23%
1896-Border Patrol Agents			
Hispanic Males	48.34%	10.11%	4.76%
Hispanic Females*	2.86%	2.20%	4.02%
White Males*	42.68%	62.49%	43.47%
White Females*	2.14%	8.54%	30.55%
Black Males*	1.61%	9.02%	4.71%
Black Females*	0.09%	3.54%	6.21%
Asian Males*	1.09%	1.95%	2.62%
Asian Females*	0.06%	0.24%	1.98%
Native Hawaiian/Pacific Islander Males	0.19%	0.19%	0.05%
Native Hawaiian/Pacific Islander Females*	0.02%	0.02%	0.08%
American Indian/Alaska Native Males*	0.69%	0.88%	0.60%
American Indian/Alaska Native Females*	0.03%	0.14%	0.47%
Two or More Races Males*	0.20%	0.55%	0.26%
Two or More Races Females*	0.02%	0.13%	0.23%
1811-Criminal Investigators			
Hispanic Males	13.32%	8.24%	4.76%
Hispanic Females*	2.15%	3.01%	4.02%
White Males	65.26%	57.85%	43.47%
White Females*	8.41%	15.30%	30.55%
Black Males*	5.16%	7.45%	4.71%
Black Females*	1.23%	4.35%	6.21%
Asian Males	2.95%	1.58%	2.62%
Asian Females*	0.54%	0.52%	1.98%
Native Hawaiian/Pacific Islander Males	0.19%	0.07%	0.05%
Native Hawaiian/Pacific Islander Females*	0.01%	0.03%	0.08%

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American Indian/Alaska Native Males*	0.55%	0.80%	0.60%
American Indian/Alaska Native Females*	0.06%	0.29%	0.47%
Two or More Races Males*	0.15%	0.35%	0.26%
Two or More Races Females*	0.03%	0.16%	0.23%
0301-Miscellaneous Administration and Programs			
Hispanic Males	4.88%	2.86%	4.76%
Hispanic Females	9.49%	5.87%	4.02%
White Males*	28.03%	27.06%	43.47%
White Females*	29.72%	43.85%	30.55%
Black Males	6.14%	3.60%	4.71%
Black Females	14.60%	8.89%	6.21%
Asian Males*	2.09%	2.57%	2.62%
Asian Females*	3.12%	3.64%	1.98%
Native Hawaiian/Pacific Islander Males	0.10%	0.03%	0.05%
Native Hawaiian/Pacific Islander Females	0.30%	0.05%	0.08%
American Indian/Alaska Native Males*	0.56%	0.33%	0.60%
American Indian/Alaska Native Females*	0.40%	0.62%	0.47%
Two or More Races Males*	0.19%	0.26%	0.26%
Two or More Races Females*	0.38%	0.39%	0.23%
0343-Management and Program Analysis			
Hispanic Males*	2.53%	2.46%	4.76%
Hispanic Females*	3.53%	2.14%	4.02%
White Males*	29.45%	49.01%	43.47%
White Females*	27.89%	32.56%	30.55%
Black Males	9.41%	3.03%	4.71%
Black Females	19.77%	3.80%	6.21%
Asian Males*	2.48%	3.33%	2.62%
Asian Females	3.07%	2.46%	1.98%
Native Hawaiian/Pacific Islander Males	0.17%	0.02%	0.05%
Native Hawaiian/Pacific Islander Females	0.14%	0.04%	0.08%
American Indian/Alaska Native Males*	0.42%	0.31%	0.60%
American Indian/Alaska Native Females	0.54%	0.32%	0.47%
Two or More Races Males*	0.21%	0.27%	0.26%
Two or More Races Females	0.41%	0.24%	0.23%
2210: Information Technology Specialists			
Hispanic Males*	4.44%	5.39%	4.76%
Hispanic Females*	0.98%	2.17%	4.02%
White Males*	47.01%	52.21%	43.47%
White Females*	14.37%	20.89%	30.55%
Black Males	13.32%	6.61%	4.71%
Black Females	7.25%	4.50%	6.21%
Asian Males	7.30%	5.14%	2.62%

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Asian Females	3.29%	1.55%	1.98%
Native Hawaiian/Pacific Islander Males	0.29%	0.10%	0.05%
Native Hawaiian/Pacific Islander Females	0.12%	0.05%	0.08%
American Indian/Alaska Native Males	0.70%	0.53%	0.60%
American Indian/Alaska Native Females*	0.24%	0.29%	0.47%
Two or More Races Males	0.43%	0.38%	0.26%
Two or More Races Females	0.26%	0.18%	0.23%
0401: General Natural Resources Management and Biology			
Hispanic Males	17.15%	2.44%	4.76%
Hispanic Females	10.11%	2.17%	4.02%
White Males*	30.54%	44.27%	43.47%
White Females*	18.62%	39.49%	30.55%
Black Males	5.08%	1.39%	4.71%
Black Females*	4.05%	1.59%	6.21%
Asian Males	8.72%	3.17%	2.62%
Asian Females*	4.01%	4.15%	1.98%
Native Hawaiian/Pacific Islander Males	0.29%	0.05%	0.05%
Native Hawaiian/Pacific Islander Females	0.25%	0.05%	0.08%
American Indian/Alaska Native Males*	0.49%	0.48%	0.60%
American Indian/Alaska Native Females*	0.16%	0.35%	0.47%
Two or More Races Males	0.33%	0.19%	0.26%
Two or More Races Females*	0.20%	0.20%	0.23%
0905-General Attorney			
Hispanic Males*	3.25%	2.52%	4.76%
Hispanic Females	5.11%	1.85%	4.02%
White Males*	38.02%	59.68%	43.47%
White Females	36.03%	26.68%	30.55%
Black Males*	1.98%	2.13%	4.71%
Black Females*	5.53%	2.60%	6.21%
Asian Males	3.29%	1.82%	2.62%
Asian Females	5.70%	1.74%	1.98%
Native Hawaiian/Pacific Islander Males	0.08%	0.02%	0.05%
Native Hawaiian/Pacific Islander Females	0.17%	0.01%	0.08%
American Indian/Alaska Native Males*	0.17%	0.31%	0.60%
American Indian/Alaska Native Females*	0.34%	0.23%	0.47%
Two or More Races Males*	0.17%	0.22%	0.26%
Two or More Races Females*	0.17%	0.18%	0.23%

Activity #2

This planned activity was completed in FY 2012 and continues as part of our annual workforce recruitment strategy led by the DHS OCHCO.

The DHS Corporate Recruitment Council (CRC) brings together key recruiting personnel from across DHS. The Council develops a "Top 25" list annually, of recruiting and outreach events that target diverse populations and events, including those that are focused on law enforcement, which represent approximately 40 percent of the positions at DHS. Additionally, OCHCO collects recruiting and marketing cost data and activities through the DHS Recruiting, Outreach and Marketing Matrix (ROMM). The ROMM allows tracking of recruitment, outreach and marketing activities and ensures Components are capturing all activities and reporting those activities to OCHCO. In the past, Components were only required to report on activities that had already occurred. Starting in FY 2017 Q2, Components were asked to also provide forecasted events and to provide monthly updates to OCHCO. Those monthly updates serve as a checkpoint to validate finalized past activities and add any opportunities that had not been previously identified. The ROMM will facilitate collaborative recruitment efforts, as well as accountability in ensuring that we are using the data to develop robust micro-targeting recruitment, outreach, and marketing strategies. OCHCO is working with Human Resources Information Technology to design a comprehensive automated/online system that is compliant with all component IT systems for the purposes of collecting ROMM data.

In FY 2017, DHS entered into memoranda of understanding (MOUs) with organizations that represent diverse Higher Education Associations including the Hispanic Association of Colleges and Universities (HACU), National Association for Equal Opportunity in Higher Education (NAFEO), American Indian Higher Education Consortium (AIHEC), Asian Pacific Islander American Association of Colleges and Universities (APIACU), and American Association of Community Colleges (AACC). DHS used these MOUs to distribute vacancy announcements such as the CBP Officer positions, the Senior Executive Candidate Development Program, and for the DHS Veterans Recruitment and Hiring Event in August 2017.

DHS also recognized 29 Employee Associations (EA) for advancing diversity and inclusion and improving communication between employees and management. An EA is an employee organization comprised of members who have a common set of interests and goals that can partner with an agency to achieve strategic departmental and human capital goals. EAs add benefits such an enhancing outreach, for example they send out job announcements to their members, as well as providing professional development for employees, and building a channel to attract diverse talent for the agency. Examples of DHS-wide EAs include the DHS Asian American and Pacific Islander Network (AAPIN), DHS Blacks in Government, DHS Emerging Leaders, DHS PRIDE, Homeland Security Employee Association, Women Executives at DHS, and the Middle Eastern Law Enforcement Officers Association (MELOA). OCHCO plans to hold monthly meetings in FY 2018 with DHS employee associations to discuss activities, projects and ways to more effectively partner with other EAs across the DHS.

Activity #3

In January 2017, the President issued a series of Executive Orders (EO) with the stated purpose of providing the DHS with additional resources, tools and personnel to carry out the critical work of securing

our borders, enforcing our immigration laws, and ensuring that individuals who pose a threat to national security or public safety cannot enter or remain in our country.

- The EOs direct the Secretary of Homeland Security to hire an additional 5,000 Border Patrol Agents and to empower state and local law enforcement to support federal enforcement of immigration law, to the maximum extent permitted by law, and to ensure that prosecution guidelines place a high priority on crimes having a nexus to our southern border.

- The EOs also instruct the Director of Immigration and Customs Enforcement to take all appropriate action to expeditiously hire 10,000 agents and officers, as well as additional mission support and legal staff necessary to support their activities.

DHS immediately established an Integrated Project Team (IPT), with regular meetings, to track progress in hiring and overall program success. The EO IPT then: 1) developed Component implementation plans that outlined specific actions each Component would take, including budgetary needs and timeliness for completion; 2) worked with OPM to identify policies/processes for enhancing hiring capacity/abilities; and explored with DoD how to streamline polygraph and suitability reciprocity.

OCHCO, through its Strategic Recruitment Diversity and Inclusion (SRDI) Office, continued to implement the FY 2016 – FY 2019 DHS Strategic Outreach and Recruitment Strategy (SOAR). The strategy has dual goals of increasing outreach to diverse groups and enhancing efficiencies in recruiting across the DHS. The implementation is also focused on greater partnership between Component recruiting and workforce planning teams. DHS also continued activities in support of achieving a "Fully Addressed" rating from the Government Accountability Office within its High Risk Report in the Human Capital Management/Targeted Outreach and Recruitment section. Some examples of these activities are the coordination of the DHS Pathfinder Hiring Event in December 2016, which focused on student interns and recent graduates, as well as the DHS Veterans Recruitment and Hiring Event in August 2017, which focused on bringing veterans into critical jobs within DHS.

Activity #4

In FY 2017, DHS updated the Applicant Flow Data (AFD) Analysis Framework. This framework is important because it helps identify and address potential recruitment and outreach barriers. This framework continues to cover the following areas- how AFD works (Data Source, Demographic Questions, DHS AFD System), Guidelines (User Access and Roles and Responsibilities), Reports, and Resources.

Example of Fiscal Year 2017Applicant Flow Data Highlights

Senior Executive Career Development Program (SES CDP) Cohort VI:
- 558 applicants applied for this cohort;
- 417 (75 percent) applicants were found minimally qualified;
- 147 applicants (26 percent) were selected for Structured Telephone Interviews;
- 115 (21 percent) applicants were referred to hiring managers for selection; and
- 51 (nine percent) applicants were selected and ratified by the Executive Review Board (including three alternates), and 50 participated/are participating in the cohort (one selectee declined participation).

The DHS AFD analysis included a breakdown of each part of the selection process by race, ethnicity, and gender to identify potential barriers.

Applicant Flow Data Analysis:

- DHS received 69.6 percent (387 of 556) of the flow data records, an increase from Cohort V (FY 2016);
- 381 (68.5 percent of the 556) applicant records included Race and/or Ethnicity data; and
- Black or African American participation rates are relatively constant until the AFD Referred stage, and participation rates for Hispanic or Latino decreased at the AFD Selected stage.

Participant Applicant Flow Data (AFD) Analysis:

- Black or African American participation rates increased since Cohort I, from 14 percent to 18 percent;
- Women's participation rates increased from Cohort V to Cohort VI, from 23 percent to 34 percent;
  - Black Women's participation rates increased from four percent to 12 percent,
  - White Women's participation rates increased from 11 percent to 16 percent,
  - Latina Women's participation rates remained constant, and
  - African-American men's participation rates have increased from Cohort V to Cohort VI, from four percent to six percent, respectively.

In FY 2018, the DHS will:
- Continue to foster partnerships with OPM and Monster Government Solutions;
- Continue to inform DHS stakeholders on AFD capabilities, resources, roles and responsibilities, etc.; and
- Crosswalk the AFD systems (Monster Government Solutions and USA Staffing).

Activity #5

In FY 2017, the CRC continued to maintain a Top 25 list of recruiting events to attend. From this list, a priority subset was identified for DHS-wide coordination, focusing on DHS mission-critical occupations, notably law enforcement. As a result, OCHCO coordinated participation across all DHS Components with the following organizations in FY 2017: Women in Federal Law Enforcement (WIFLE), National Asian Peace Officers Association (NAPOA), National Organization of Black Law Enforcement Executives (NOBLE), National Native American Law Enforcement Association (NNALEA), League of United Latin American Citizens (LULAC), Hispanic Association of Colleges and Universities (HACU), Hispanic American Police Command Officer Association (HAPCOA), and the Society for American Indian Government Employees (SAIGE).

Activity #6

DHS increased its use of the Pathways Program, the federal government's primary entrance point for students and recent graduates. In FY 2017, DHS hired 228 Pathways student interns, 208 summer interns, 155 recent Graduates, and 25 Presidential Management Fellows, totaling 616 Pathways Program participants. Of these, 40.3 percent identified as members of a minority racial or ethnic group, and 54.8 percent were women. To improve the participation rates of minority ethnic and racial groups in STEM fields, DHS continued sponsorship of the DHS Summer Research Team (SRT) Program for MSIs; the DHS Homeland Security Related Science, Technology, Engineering, and Mathematics (HS-STEM) Internship Program; the DHS Summer Research Experiences for Federal Service Academies in DHS University Centers of Excellence; the Nuclear Forensics Undergraduate Summer School; the Seaborg Institute Nuclear Science Summer Internship Program; and the Office of Health Affairs Volunteer Scholars Program.

Activity #7

The DHS Components completed CROPs, one of the key tools to execute the DHS SOAR Strategy. The CROPs focused on mission-critical occupations (MCOs). The CROPs include long-term staffing gap projections and planned strategies to fill those gaps. This process required Component recruiters to collaborate with workforce planners and Diversity and Inclusion and EEO staff to identify staffing gaps for two out-years. OCHCO Diversity and Inclusion staff developed and evaluated the CROPs through an Accountability Checklist, in order to assess the CROP submissions for accuracy and completion.

Activity #8

Once CROPs are completed, OCHCO assesses the CROPs against an assessment checklist to ensure activities are aligned with the SOAR, DHS Inclusive Diversity Strategic Plan, and diversity reports (e.g., FEORP). The FY 2017 CROPs outlined planned activities for the FY 2018 recruiting season and will be used in conjunction with the ROMM to forecast events to ensure short and long-term recruitment planning.

Component Updates

Incorporated by reference, per EEOC guidance.

Part I.2 – Lower Than Expected Participation of Individuals with Disabilities/Targeted Disabilities

Part I.2 was replaced with Part J, Section VII: Identification and Removal of Barriers.

Part I.3 – High Employee Non-Retirement Separations

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 a potential barrier?	The non-retirement separation rate is high and disproportionately affects certain groups, most notably White women. The high separation rate also erodes efforts to create a workforce reflective of the nation and to maintain target staffing levels. Statistical data on separation rates were reviewed and analyzed.
BARRIER ANALYSIS: Provide a description of the steps taken and data analyzed to determine cause of the condition.	DHS formed a DHS-wide team lead by the EEO Directors Council that reviewed all Component workforce data and DHS-level FEVS, Best Places to Work, and exit survey results. Note: This is a multi-year plan which carries over into future years.
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.	DHS has identified supervision/management, lack of advancement opportunities, personal/family related reasons, insufficient work/life programs, and lack of alternate work schedules as causes of higher-than-expected non-retirement separations. Low OPM Employee Viewpoint Survey ratings and exit survey data are the primary sources for barrier identification.
OBJECTIVE: State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.	Investigate and identify specific opportunities to improve supervision/management, advancement opportunities, organizational response to personal/family related reasons, work/life programs, and alternate work schedules any trends in resignations and reduce the overall rates by improving employee satisfaction.
RESPONSIBLE OFFICIAL:	OCHCO; CRCL; DHS Components
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2019 (Revised in FY 2017 with revision of Objective)

EEOC FORM
715-01
PART I

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

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE	TARGET DATE

1. Develop and Implement Exit Survey. (DHS Workforce Strategy Objectives 3.1 and 3.5: Use employee feedback to influence workplace policies and practices in order to improve employee satisfaction; Enhance employee recognition and work-life balance initiatives to improve employee satisfaction and retention.)

   a. OCHCO will implement exit survey DHS-wide.

      a. 3/31/2011 - Completed and continues.

   b. OCHCO will conduct preliminary review of results.

      b. Quarterly, beginning 6/30/2011 Completed in FY 2012 and continues.

   c. OCHCO will conduct first major review of results.

      c. Annually, beginning 12/31/2011 Completed in 2012 and continues.

   d. OCHCO will update or augment methods as needed.

      d. Annually, beginning 3/31/2012 Completed in FY 2012 and continues.

   e. OCHCO and CRCL will identify retention interventions.

      e. Annually, beginning 6/30/2012 Completed and continues.

   f. OCHCO and CRCL will implement these interventions
      - Track interventions through this plan quarterly
      - Evaluate as yearly data become available
      - Make any needed corrections
      - Conduct-in-depth analysis every second year

      f. Beginning 12/30/2012 Completed and continues.

2. Use Employee Viewpoint survey to identify changes needed to improve employee satisfaction.

   a. CRCL will provide annual Federal Employee Viewpoint Survey (FEVS) results (and new yearly survey results as they become available) to DHS Components

      a. Within two months of FEVS results publication **Completed in 2013 and continues.**

   b. OCHCO, CRCL and Components will work jointly to develop plan for needed changes

      b. Within four months of FEVS results publication **Completed in 2013 and continues.**

3. Review promotion data.   Completed and continues.

   a. CRCL will determine if there are areas or occupations with triggers in promotions.

        a. Annually, beginning 6/30/2011

   b. CRCL will determine if these correlate with higher resignation rates

        b. Annually, beginning 9/30/2011

   c. If yes, CRCL will work with OCHCO to identify interventions
- Track interventions through this plan
- Evaluate as yearly data become available
- Make any needed corrections

        c. Annually, beginning 3/30/2013

4. DHS Components will promote participation in their career development programs, academic programs, and learning training programs sponsored by their agency and/or government agencies. In addition, as appropriate, Components will have access to training/career development programs courses through:

        Annually, beginning 3/31/2011
Completed in FY 2013 and continues.

- Performance and Learning Management System (PALMS)
- Online Courses
- Online Books
- (CBP) Leadership Institute
- (USCIS) Training Academy
- (ICE) Virtual University
- (FEMA) Employment Development Division
- (FLETC) Learning Management System
- (TSA) Online Learning Center
- DHS CRCL Institute
- Naval Post Graduate School

5. DHS will continue to promote/advertise DHS-wide the Senior Executive Service Candidate Development and Fellows Program.

        Annually, beginning 3/31/2011
Completed in FY 2013 and continues.

6. DHS Components will use their agency's Mentoring Program, if applicable, as another career development tool.

        Annually, beginning 3/31/2011
Completed in FY 2013 and continues.

7. DHS Components will conduct an assessment of occupations and grade levels where there is substantial underrepresentation to identify skills, knowledge, and abilities by occupation; employees' training needs; and applicable career development programs.

        Annually, beginning 3/31/2011

REPORT OF ACCOMPLISHMENTS AND MODIFICATIONS TO OBJECTIVE

Activity #1

DHS continued its usage of the DHS-wide web-based Exit Survey. The top reasons that separating non-SES employees (excluding those who were retiring) listed for leaving DHS, were the same as reasons given in prior years:

- Lack of advancement opportunities,
- Problems with supervisor/management, and
- Family related/personal reasons.

Results are based on completed exit surveys. USSS and TSA do not participate in the DHS-wide survey.

Activity #2

In FY 2015, OCHCO, with input from the EESC, developed an Employee Engagement Action Plan (Plan) for DHS. The major focus areas of the Plan are: (1) selecting and empowering high performing leaders; (2) developing excellent leaders at all levels; and (3) enhancing two-way communication and inclusion, utilizing labor management forums, diversity and inclusion councils, and ideation platforms. DHS Components developed their individual action plans. Components shared data and action plans, with CRCL. In FY 2016, OCHCO, in partnership with EESC, focused on two key areas: communication and leadership. In FY 2017, the EESC continued its monthly meetings, chaired by the Under Secretary for Management. Through the EESC, DHS recognized and rewarded excellence, enhanced communication, and increased leadership accountability, awareness, and empowerment related to employee engagement. Results from the 2017 Federal Employee Viewpoint Survey indicated that DHS has made significant progress and has shown notable improvement in the area of Employee Engagement. Of all Cabinet-level agencies, DHS showed the largest improvement.

Activity #3

Part E covers the FY 2017 trigger analysis and information on Activity #3 part b and c actions.

Activity #4

In FY 2015, DHS established the Office of Academic Engagement to leverage relationships with the academic community and the Homeland Security Academic Advisory Council, which provides advice and recommendations to the Secretary and senior leadership relating to student and recent graduate recruitment; international students; academic research; campus and community resiliency, security and preparedness; and faculty exchanges.

DHS Components continued to promote participation in their career development programs, academic programs, and learning training programs sponsored by their organization and/or other government agencies. In

addition, 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, advertised both internally and externally to DHS;
- DHS, in partnership with SkillSoft, offers almost 20,000 online learning resources. These online resources can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are subject to mapping to support competencies, job roles or blended learning offerings.
- The leadership Development Channel, which is a resource that includes videos with the most current ideas, information, and know-how on business and leadership topics to address the informal learning needs of an organization.
- Eight of the nine DHS Components have a formal career development programs.

Activity #5

Advertising for Senior Executive Service Candidate Development Program occurs via email, the DHS website, and other avenues of communication. OCHCO Diversity and Inclusion will continue its outreach efforts to help ensure a diverse applicant pool for this program. The DHS Fellows Program has not been funded since FY 2014.

Activity #6

Completed in FY 2013. Components continue to use their agency mentoring programs, as appropriate.

Activity #7

See Activity 4 under Part I.1 for Department level actions related to this activity.

Part J – Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plans for persons with disabilities (PWD[11]) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and EEOC MD-715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

Section I: Efforts to Reach Regulatory Goals

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

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

    a. Cluster GS-1 to GS-10 (PWD)   Yes X   No
    b. Cluster GS-11 to SES (PWD)   Yes X   No

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

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

    a. Cluster GS-1 to GS-10 (PWTD)   Yes X   No
    b. Cluster GS-11 to SES (PWTD)   Yes X   No

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

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

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

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[11] In this report, persons with disabilities (PWD) and individuals with disabilities (IWD) are used interchangeably. Persons with targeted disabilities (PWTD) and individuals with targeted disabilities (IWTD) are also used interchangeably.

Section II: Model Disability Program

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

PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

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

Yes X   No

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

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD.	123	9	28	Laura Davis, Disability Employment Program Manager, CRCL. Each Component maintains responsibility for servicing their respective workforce. The total FTEs are included in the count.
Answering questions from the public about hiring authorities that take disability into account	132	9	29	Laura Davis, Disability Employment Program Manager, CRCL. Each Component maintains responsibility for servicing their respective workforce. The total FTEs are included in the count.
Processing reasonable accommodation requests from applicants and employees	18	0	25	Laura Davis, Disability Employment Program Manager, CRCL; Darlene Avery for HQ requests; all other Component POCs are

				identified in their Component-level report. Each Component maintains responsibility for servicing their respective workforce. the total FTEs are included in the count.
Section 508 Compliance	62	0	0	Bill Peterson, Director, Office of Accessible Systems and Technology, Office of the Chief Information Officer. Each Component maintains responsibility for servicing their respective workforce. The total FTEs are included in the count.
Architectural Barriers Act Compliance	110	0	0	Jim Stader, Executive Director, Facilities and Operational Support, MGMT/FOS. Each Component maintains responsibility for servicing their respective workforce. The total FTEs are included in the count.
Special Emphasis Program for PWD and PWTD	8	0	0	Laura Davis, Disability Employment Program Manager, CRCL. Each Component maintains responsibility for servicing their respective workforce. The total FTEs are included in the count.

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">Yes X   No</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 of best practices across DHS Components.
> - Participation in the Federal Exchange on Employment & Disability (FEED), a Federal Interagency working group focused on information sharing, best practices, and collaborative partnerships designed to make the Federal Government a model employer of people with disabilities.
> - Developed and delivered DHS Selective Placement Program Coordinator training to all identified Selective Placement Program Coordinators and Disability Program Managers.

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">**Yes** X   No</div>

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

Section III: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

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

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

In FY 2017, DHS participated in 91 events targeting veterans with disabilities and 14 events targeting individuals with disabilities (IWD) and targeted disabilities (IWTD).   Events targeting IWD and IWTD included:

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

Additionally, DHS conducted the following activities:

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

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

- Maintained strategic partnerships with national disability advocacy groups and provided Components with recruitment resources for Individuals with Disabilities/Individuals with Targeted Disabilities. DHS attended recruiting events at Gallaudet University, California State Northridge, the National Technical Institute for the Deaf, and Bender Disability Virtual Career Fair.

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))

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

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

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

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

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

Yes X   No   N/A

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

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

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

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

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

   a. New Hires for Permanent Workforce (PWD) Yes   No X
   b. New Hires for Permanent Workforce (PWTD) Yes X No

> During FY 2017, DHS exceeded the 12 percent hiring goal for IWD, representing 12.04 percent of all new hires. DHS did not reach the 2 percent hiring goal for IWTD. IWTD represented 1.14 percent of all new hires, which falls below the 2 percent hiring goal.
>
> Disability workforce data includes employees who self-identify as having a disability and employees appointed under Schedule A and 30 percent or more Disabled Veterans who do not otherwise identify as having a disability.

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

   a. New Hires for MCO (PWD) Yes   No X
   b. New Hires for MCO (PWTD) Yes X No

> Based on a review of B7 Applications and Hires which represents AFD and hires for Components (CBP, HQ, ICE, USCIS, and FEMA) that are using USA Staffing Cognos, triggers exist for the following occupations of the 10 Major Occupational Classifications for IWTDs:
>
> 1802-Compliance Inspection and Support: Qualified 1.54 percent; Selections 0.69 percent
> 1895-Customs and Border Protection: Qualified 0.51 percent; Selections 0.00 percent
> 1896-Border Patrol Agent: Qualified 0.73 percent; Selections 0.00 percent
> 0343-Management and Program Analysis: Qualified 2.35 percent; Selections 1.98 percent
> 2210-Information Technology Management: Qualified 1.16 percent; Selections 0.90 percent

0401-General Natural Resources Management and Biologist: Qualified 1.36 percent; Selections 0.00 percent

No triggers were identified for IWD based on a review of DHS's major occupational categories.

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified *internal* applicants for any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below.

    a. Qualified Applicants for MCO (PWD)   Yes   No   N/A X

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

Relevant applicant pool data is not available. Identifying which current DHS employees would qualify for a job series they are not currently in is a difficult undertaking. The Human Capital offices do not adjudicate applicant qualifications until an applicant applies for a specific position, and the applicant may qualify based on experience obtained prior to entry into their current job series, or into DHS. DHS has not attempted to develop an estimate for job series-relevant applicant pools to date. In FY 2018, DHS will work to determine whether there is a way to develop the relevant internal applicant pool percentages for each series.

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

    a. Promotions for MCO (PWD)   Yes X   No

    b. Promotions for MCO (PWTD)   Yes X   No

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

IWD

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

IWTD

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

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

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

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

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

A. ADVANCEMENT PROGRAM PLAN

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

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

B. CAREER DEVELOPMENT OPPORTUNITIES

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

DHS hosted the Third Annual DHS Education Fair on September 21, 2017 in Washington, D.C., which included over 30 colleges and universities offering information on degrees and certifications available to DHS employees and family members. 225 employees and family members attended in person, and 100 employees participated by webinar. DHS Components continue to promote participation in their training and career development and academic programs through their internal Component websites and employee communications channels.

Additionally, DHS employees have access to training/career development courses such as DHS's Senior Executive Service Candidate Development Program. DHS, in partnership with SkillSoft, offers approximately 20,000 online learning resources. Employees can use these online resources as quick references, practical job aids to gain in-depth knowledge, or skill practice. These resources are mapped to support competencies, job roles, or blended learning offerings.

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

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In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate. [Collection begins with the FY 2018 MD-715 report, which is due on February 28, 2019.]

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs (Pathways Intern)		436		31.7%		4.02%
Fellowship Programs (Pathways Recent Graduates)		155		29.6%		0.65%
Presidential Management Fellows		25		20.0%		4.0%
Mentoring Programs		94		4.2%		2.1%
Coaching Programs						
Training Programs						
Detail Programs						
Other Career Development Programs DHS SES CDP	558	51 selectees; however, 50 selectees participate in the program.	2.16% (Data from USA Staffing Applicant Flow Data Cognos Summary Report; reference VIN 1825165)	0%	0.72% (Data from USA Staffing Applicant Flow Data Cognos Summary Report; reference VIN 1825165)	2%

Do triggers exist for <u>PWD</u> among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

      a. Applicants (PWD)   Yes   No   N/A X

      b. Selections (PWD)   Yes   No   N/A X

> Detailed applicant flow data (AFD) for the career development programs identified above are not available at the DHS level. DHS CRCL will continue to coordinate efforts with OCHCO and OPM to acquire access to applicant flow data as identified in the planned activities.
>
> During FY 2017, AFD data were not available to conduct an analysis of the applicants and selections for development programs identified above by the required benchmarks. However, when comparing the number of selections for PWD to the 12 percent goal, PWD (IWD) were selected at rates significantly below those expected in the reported mentoring programs and the SES CDP program.

Do triggers exist for <u>PWTD</u> among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

      a. Applicants   (PWTD)   Yes   No   N/A X

      b. Selections   (PWTD)   Yes   No   N/A X

> Detailed applicant flow data (AFD) for the career development programs identified above are not available at the DHS level. DHS CRCL will continue to coordinate efforts with OCHCO and OPM to acquire access to applicant flow data as identified in the planned activities.
>
> During FY 2017, AFD data were not available to conduct an analysis of the applicants and selections for development programs identified above by the required benchmarks.   When comparing the number of selections for PWTDs (IWTD) to the 2 percent goal, PWTDs (IWTD) are exceeding in all programs with the exception of the Pathways-Recent Graduates program.

C. <u>AWARDS</u>

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)   Yes X   No

      b. Awards, Bonuses, & Incentives (PWTD)   Yes X   No

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

IWD   **Benchmark**

1-9 hours: IWD Inclusion Rate: 26.87%   IWOD Inclusion Rate: 34.52%

Cash awards 1 – $500:   IWD Inclusion Rate: 21.65%   IWOD Inclusion Rate: 26.63%

Cash awards $500 +:   IWD Inclusion Rate: 50.41%   IWOD Inclusion Rate: 59.85%

IWTD   **Benchmark**

1-9 hours: Inclusion Rate: 34.03%   IWOD Inclusion Rate: 34.52%

9+ hours: Inclusion Rate: 25.40%   IWOD Inclusion Rate: 26.49%

Cash awards $500 +:   Inclusion Rate: 47.37%   IWOD Inclusion Rate: 59.85%

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

    a. Pay Increases (PWD)   Yes   No X

    b. Pay Increases (PWTD)   Yes   No X

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

QSI Awards   IWD Inclusion Rate: 1.16%

                 IWTD Inclusion Rate: 1.53%

Benchmark   IWOD Inclusion Rate: 0.74%

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

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

   a. Other Types of Recognition (PWD)   Yes   No   N/A X
   b. Other Types of Recognition (PWTD)   Yes   No   N/A X

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

D. PROMOTIONS

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

   a. SES

       i. Qualified Internal Applicants (PWD)   Yes   No   N/A X

       ii. Internal Selections (PWD)   Yes   No   N/A X

   b. Grade GS-15

       i. Qualified Internal Applicants (PWD)   Yes X   No

       ii. Internal Selections (PWD)   Yes   No X

   c. Grade GS-14

       i. Qualified Internal Applicants (PWD)   Yes X   No

       ii. Internal Selections (PWD)   Yes   No X

   d. Grade GS-13

       i. Qualified Internal Applicants (PWD)   Yes X   No

       ii. Internal Selections (PWD)   Yes   No X

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

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

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

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

a. SES

    i. Qualified Internal Applicants (PWTD)   Yes   No   N/A X

    ii. Internal Selections (PWTD)   Yes   No   N/A X

b. Grade GS-15

    i. Qualified Internal Applicants (PWTD)   Yes X   No

    ii. Internal Selections (PWTD)   Yes   No X

c. Grade GS-14

    i. Qualified Internal Applicants (PWTD)   Yes X   No

    ii. Internal Selections (PWTD)   Yes   No X

d. Grade GS-13

    i. Qualified Internal Applicants (PWTD)   Yes X   No

    ii. Internal Selections (PWTD)   Yes   No X

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

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

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

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Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWD</u> 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.

3.

a.	New Hires to SES	(PWD)	Yes	No	N/A X
b.	New Hires to GS-15	(PWD)	Yes	No X
c.	New Hires to GS-14	(PWD)	Yes	No X
d.	New Hires to GS-13	(PWD)	Yes	No X

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

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

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

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

    a. New Hires to SES (PWTD)   Yes   No X

    b. New Hires to GS-15 (PWTD)   Yes   No X

    c. New Hires to GS-14   (PWTD)   Yes X   No

    d. New Hires to GS-13 (PWTD)   Yes X   No

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

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

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

5. Does your agency have a trigger involving <u>PWD</u> among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

    a. Executives

        i. Qualified Internal Applicants (PWD)   Yes   No   N/A X

        ii. Internal Selections (PWD)   Yes X   No

    b. Managers

        i. Qualified Internal Applicants (PWD)   Yes   No   N/A X

        ii. Internal Selections (PWD)   Yes X   No

    c. Supervisors

        i. Qualified Internal Applicants (PWD)   Yes   No   N/A X

        ii. Internal Selections (PWD)   Yes   No X

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

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

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

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6. Does your agency have a trigger involving <u>PWTD</u> among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

    a. Executives

        i. Qualified Internal Applicants (PWTD)   Yes   No   N/A X

        ii. Internal Selections (PWTD)   Yes   No X

    b. Managers

        i. Qualified Internal Applicants (PWTD)   Yes   No   N/A X

        ii. Internal Selections (PWTD)   Yes   No X

    c. Supervisors

        i. Qualified Internal Applicants (PWTD)   Yes   No   N/A X

        ii. Internal Selections (PWTD)   Yes   No X

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

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

    a. New Hires for Executives (PWD)   Yes   No X

    b. New Hires for Managers (PWD)   Yes   No X

    c. New Hires for Supervisors (PWD)   Yes   No X

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

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

    a. New Hires for Executives (PWTD)   Yes   No X

    b. New Hires for Managers (PWTD)   Yes   No X

    c. New Hires for Supervisors (PWTD)   Yes   No X

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

Section V: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

<div align="center">Yes   No X   N/A</div>

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

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

     a. Voluntary Separations (PWD)   Yes X   No

     b. Involuntary Separations (PWD)   Yes   No X

> Based on a review of MD-715 Table B14: Separations by Type of Separation - Distribution by Disability, IWD are exceeding the inclusion rate benchmark for voluntary separations.
>
> Voluntary Separations   PWD (IWD) Inclusion Rate: 6.75%
>
> Benchmark   PWOD (IWOD) Inclusion Rate: 5.71%
>
> Further review indicates four out of nine DHS Components have triggers in both voluntary and involuntary separations.

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

    a.   Voluntary Separations (PWTD)   Yes X   No

    b.   Involuntary Separations (PWTD)   Yes X   No

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

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

Involuntary Separations	PWTD (IWTD) Inclusion Rate:	0.93%
Benchmark	PWOD (IWOD) Inclusion Rate:	0.73%

Further review indicates four out of nine DHS Components have triggers in voluntary separations, and two out of nine indicate triggers for involuntary separations.

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

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

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

Supervision/Management –11.3%

Personal/Family Related – 9.6%

Advancement Opportunities – 9.3%

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

When comparing the response rates for leaving based on health-related reasons, PWD (IWD) had an 8% response rate compared to a 1.1% response rate for IWODs.

Further review revealed a 3% response rate for employees indicating they had a targeted disability.

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

Supervision/Management – 13.8%

Salary/Pay – 11.0%

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

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

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

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

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

DHS CRCL will collaborate with the Office of Accessible Systems and Technology to update the page to include a notice of rights under Section 508, including a description of how to file a complaint during FY 2018. Currently, Section 508 complaints from the public are processed under Section 504, and complaints from employees can be processed using the EEO Complaint Process or procedures under Section 504. Links to both procedures are provided below:

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

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

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

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

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

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

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

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

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

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

DHS issued the policy and procedures for Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-Employment). Directive Number 065-01 outlines DHS' policy and Instruction Number 065-01-001 provides implementing its instruction. This policy requires all Components to identify Disability Access Coordinators and requires each Component to conduct a self-evaluation of DHS programs and activities to ensure accessibility.

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

C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

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

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

CBP: 41.7 Days

USCIS: 17 Days

HQ: 21 Days

FEMA: 2.5 Days

ICE: 24.37 Days

TSA: 35 Days

USCG: 16.41 Days

USSS: 11.65 Days

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

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

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

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

DHS continues to partner with the Department of Defense (DoD), Computer/Electronic Accommodation Program (CAP) to provide assistive technology accommodation solutions. During FY 2017, CAP provided 357 accommodations to 148 employees, totaling $126,658.90 in cost savings to DHS.

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

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

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

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

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

Section VI: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

    Yes X   No   N/A

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

    Yes X   No   N/A

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

> DHS had two findings alleging harassment based on disability status during FY 2017. A summary of the corrective measures taken are as follows:
>
> Finding # 1:
>
> 1.   Post notice for 120 consecutive days.
> 2.   Within 60 days of the date the decision is final, pay $500 in non-pecuniary compensatory damages.
> 3.   Provide training to the two EEO Specialists who processed the complaint.
>
> Finding # 2:
>
> 1.   Within 60 days of date of decision, provide at least three hours of training to the three named supervisors.
>
> 2.   Within 90 days of date the decision becomes final, consider taking disciplinary action against the coworker and supervisor. Report who considered the disciplinary action, what factors were considered, and what action was taken. If no action is taken, report the reasons why.
>
> 3.   Entitled to compensatory damages.
>
> a.   On September 9, 2017, a FAD awarded $25,000 in non-pecuniary compensatory damages.
>
> 4.   Entitled to attorney's fees and costs.
>
> a.   On September 9, 2017, a FAD awarded no attorney's fees.
>
> 5.   Post notice for 60 days.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

    Yes   No X   N/A

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

    Yes X   No   N/A

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

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

Finding # 1: (same as Finding # 1 for Harassment above)
1. Post notice for 120 consecutive days.
2. Within 60 days of the date the decision is final, pay $500 in non-pecuniary compensatory damages.
3. Provide training to the two EEO Specialists who processed the complaint.

Finding #2:
1. Within 60 days of receipt of the decision, provide EEO training for the HR Specialist with a focus on the correct procedures and processing of reasonable accommodations.
2. Determine back pay from June 9, 2016 to January 26, 2017.
3. Within 90 days of date decision becomes final, consider taking disciplinary action against the HR Specialist. Report who considered the disciplinary action, what factors were considered, and what action was taken.   If no action is taken, report the reasons why.
4. $7,500 in non-pecuniary compensatory damages.
5. $13,195 in attorney's fees and $317.70 in costs.
6. Post notice for 60 days.

Section VII: Identification and Removal of Barriers

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

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

    Yes X   No

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

    Yes X   No   N/A

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

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Trigger 1	Lower than expected participation for individuals with disability (IWD) and targeted disabilities (IWTD) when compared to the regulatory goals of 12 percent for IWD and 2 percent for IWTD in grade clusters GS 1 – 10 and GS 11 – SES.
Barrier(s)	Not Identified
Objective(s)	Increase workforce participation rates of IWD and IWTD at all grade levels.

Responsible Official(s)	Performance Standards Address the Plan? (Yes or No)
CRCL OCHCO OAST (need to identify names of Officials)	

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

Fiscal Year	Accomplishments
2017	N/A - Newly established.

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

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

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

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Trigger 2	Unavailability of applicant flow data by disability distribution to effectively analyze percentage of qualified applicants for career development opportunities, promotions and new hires. Limited access to Applicant Flow data using current systems (USA Staffing/Cognos, Monster Government Solutions, and Learning Management Systems).
Barrier(s)	Not Identified.
Objective(s)	Acquire accurate and reliable applicant flow data to analyze, monitor and inform program enhancements to increase representation of IWD and IWTD in all programs and hires.

Responsible Official(s)	Performance Standards Address the Plan? (Yes or No)
CRCL OCHCO SRDI OCHCO Reports and Analysis (need to identify names of Officials)	

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2019	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	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		

Fiscal Year	Accomplishments
2017	N/A - Newly established.

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

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

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 3	Individuals with disabilities and targeted disabilities are receiving recognition and awards at rates lower than expected when compared to individuals without disabilities.			
Barrier(s)	Not identified.			
Objective(s)	Identify policy, practice or procedures that may be impacting award distribution for IWD and or IWTDs.			
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)		
CRCL OCHCO (need to identify names of Officials)				
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2018	Collaborate with OCHCO to review recognition and awards policy, practices and procedures, and determine next steps.	Yes		
Fiscal Year	Accomplishments			
2017	Newly established			

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

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

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 4	Lower than expected conversion rates of eligible Schedule A employees into competitive service.
Barrier(s)	Not identified.

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Objective(s)	Increase conversion rates of eligible Schedule A employees.				
	Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)		
CRCL OCHCO					
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)	
09/30/2018	Review and analyze current policies and procedures for excepted service appointments.	Yes			
01/30/2018	Monitoring Schedule A Conversions on a quarterly basis.	Yes			
09/30/2018	Coordinate efforts with OCHCO to develop DHS Schedule A policy and procedures.	Yes			
Fiscal Year	Accomplishments				
2017	Newly established				

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

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

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 5	Higher than expected separation rates for individuals with disabilities.
Barrier(s)	Not Identified
Objective(s)	Increase retention rates of individuals with disabilities and targeted disabilities.

Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)		
CRCL OCHCO				
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
01/30/2018	Review and analyze exit surveys to identify barriers to retention.	Yes		
01/30/2018	Monitor separations on a quarterly basis by disability distribution.	Yes		
06/30/2018	Collaborate with OCHCO to explore feasibility of implementing new retention programs specifically for IWD and IWTD.	Yes		
Fiscal Year	Accomplishments			
2017	Newly established			

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

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

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.