



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

Fiscal Year 2018



Homeland
Security

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FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

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MD-715

Parts A Through D: Agency Identifying Information

Part A - Department or Agency Identifying Information

Agency	Second Level Component	Address	City	State	Zip Code (xxxxx)	Agency Code (xxxx)	FIPS Code (xxxx)
Department of Homeland Security		245 Murray Lane, SW, Bldg. 410, MS 0191	Washington	DC	20528	HSA A	7000

Part B - Total Employment

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	188,225	18,270	207,866 (includes non-appropriated from USCG)

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

Agency Leadership	Name	Title
Head of Agency	Kevin K. McAleenan	Acting Secretary
Head of Agency Designee	Cameron Quinn	Officer for Civil Rights and Civil Liberties (CRCL)

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

EEO Program Staff	Name	Title	Occupational Series (xxxx)	Pay Plan and Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
Principal EEO Director/Official	Veronica Venture	Deputy Officer for CRCL and Director for Equal Employment Opportunity and Diversity	0260	ES-00	202-357-1270	Veronica.Venture@HQ.DHS.GOV

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EEO Program Staff	Name	Title	Occupational Series (xxxx)	Pay Plan and Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
Title VII Affirmative Action Program Official	Elaine McKinney	Director, Diversity Management Section (DMS), CRCL	0260	GS-15	202-357-1262	elaine.mckinney@hq.dhs.gov
Section 501 Affirmative Action Program Official	Laura Davis	Equal Employment Manager, DMS, CRCL	0260	GS-15	202-357-1264	laura.davis@hq.dhs.gov
Complaint Processing Program Manager	Chrystal Young	Director, Complaints Management and Adjudication Section (CMAS), CRCL	0260	GS-15	202-357-1273	chrystal.r.young@hq.dhs.gov
EEO Staff Statistician	Greg Beatty	EEO Staff Statistician, DMS, CRCL	1530	GS-15	202-897-6984	greg.beatty@hq.dhs.gov
Special Emphasis Program Manager (SEPM)	Michelle McGriff	Equal Employment Manager, DMS, CRCL	0260	GS-15	202-357-1261	michelle.mcgriff@hq.dhs.gov
Special Emphasis Program Manager (SEPM)	Conchetta Belgrave	Equal Employment Opportunity Specialist, DMS, CRCL	0260	GS-14	202-357-1249	conchetta.belgrave@hq.dhs.gov
Equal Opportunity Employment Specialist	Sara Fernandez	Equal Employment Opportunity Specialist, DMS, CRCL	0260	GS-12	202-357-1268	sara.fernandez@hq.dhs.gov

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

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

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

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

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

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

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

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Did the agency submit the following mandatory documents?	Please respond Yes or No	Comments
Personal Assistance Services Procedures	Yes	
Alternative Dispute Resolution Procedures	Yes	

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

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

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Part E: Executive Summary

All agencies must complete Part E.1; however, only agencies with 199 or fewer employees in permanent FT/PT appointments are required to complete Part E.2 to E.5. Agencies with 200 or more employees in permanent FT/PT appointments have the option to complete Part E.2 to E.5.

Part E.1 - Executive Summary: Mission

Introduction

This Equal Employment Opportunity Program Status Report for Fiscal Year 2018 (FY 2018) outlines the status of the U.S. Department of Homeland Security's (DHS or Department) Equal Employment Opportunity (EEO) Program activities undertaken pursuant to its EEO program responsibilities under Title VII of the Civil Rights Act of 1964. 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 2019 plan to address any programmatic deficiencies that 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.

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

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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 (EEOD) Division includes the following organizational units: Diversity Management Section (DMS); EEO Complaints Management and Adjudication Section (CMAS); Alternative Dispute Resolution (ADR) Section; DHS-Headquarters EEO Office (HQ EEO); and HQ Anti-Harassment Unit (AHU).

Part E.2 - Executive Summary: Essential Element A - F

Program Elements

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

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

The EEOC has established specific measures for each of the six elements of a model EEO program. Beginning in the FY 2018 reporting cycle, the EEOC increased the number of measures from 122 to 156. Each DHS Component reports to the EEOC as to whether each measure is *met*, *unmet* or *not applicable* in addition to the Department. For this report, the Department issued a data call to all DHS Components to provide a draft list of measures indicating met/unmet/not applicable status. Of the nine DHS Components, eight responded to the data call in time for inclusion in this report. The overall compliance rate with the six essential elements for DHS increased from a 92.9 percent average in FY 2017 to a 93.9 percent average in FY 2018.

The scorecard below shows the percentage of measures met for each of the essential elements by DHS Components that reported during FY 2017 and Components that reported in FY 2018. Notably, compliance with four of the six essential elements increased during FY 2018.

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Model EEO Program Scorecard		
	FY 2017 % Met	FY 2018 % Met
Essential Element A: Demonstrated Commitment from Agency Leadership	95.9%	96.5%
Essential Element B: Integration of EEO into the Agency's Strategic Mission	93.4%	91.1%
Essential Element C: Management and Program Accountability	85.6%	90.3%
Essential Element D: Proactive Prevention of Unlawful Discrimination	88.9%	89.3%
Essential Element E: Efficiency	93.8%	97.2%
Essential Element F: Responsiveness and Legal Compliance	100.0%	99.0%
Total	92.9%	93.9%

Notes: 122 measures in FY 2017; 156 measures in FY 2018. In 2018, data for FEMA was not available at time of reporting. In 2017, data for Headquarters was not available for reporting.

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 2018, OCHCO’s Strategic Learning, Development, and Engagement division piloted the DHS Leadership Pilot Survey at the Transportation Security Administration (TSA) and U.S. Citizenship and Immigration Services (USCIS), reaching more than 15,000 employees. In the survey, employees provided feedback about engagement-related leadership behaviors to their first, second, and third-line supervisors, including an assessment of the work-team/work-unit climate. Supervisors received aggregated reports with their feedback, along with guidance on translating their results into developmental actions. The pilot assessed the effectiveness of the survey as well as the quality of the participants’ experiences. The Leadership Survey was intended to

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empower employees and improve the leadership culture. Consistent with the Department's 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 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. In January 2018, the study's findings and recommendations were approved by former Deputy Secretary Elaine Duke. 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 March, National 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. The Department has begun implementation of the recommendation that a mentoring program for women law enforcement officers, be established. The pilot program is expected to commence in March 2019.

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

- The DHS Strategic Plan (2014 – 2018) includes *Goal 6: Strengthen Service Delivery and Manage DHS Resources*. The workforce strategy integrates diversity:

“Recruit, hire, retain, and develop a highly qualified, diverse, effective, mission-focused, and resilient workforce by implementing programs and resources that focus on four key objectives: 1) building an effective, mission-focused, diverse, and inspiring cadre of leaders; 2) recruiting a highly qualified and diverse workforce; 3) retaining an engaged workforce; and 4) solidifying a DHS culture of mission performance, adaptability, accountability, equity, and results.”

In addition to integration into Goal 6, *Percent of Equal Employment Opportunity complaints timely adjudicated (DMS – CRCL)* is one of the seven highlighted performance measures for the Mature and Strengthen Homeland Security mission.

- During FY 2018, 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.

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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.
- DMS conducted technical assistance sessions and training for all DHS Components. Topics included an EEO Reports Update on the FY 2017 MD-715 and a review of Affirmative Action Plans for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities.
- DMS provided a briefing on the Mid-Year Accomplishments Report based on DHS-wide data provided to DHS Component SEP managers and MD-715 preparers. This DHS-wide report contained a review of Component self-assessments, program deficiencies, disability employment progress, and actions taken toward creating a model workplace. The mid-year report information was used by Components when preparing their annual MD-715 reports.
- DMS held Component and Disability Employment Advisory Council meetings on a quarterly basis to review narrative and statistical data relating to each Component’s MD-715 program and SEPs. Each Component was afforded an opportunity to discuss its data and progress.
- In coordination with the Office of Accessible Systems and Technology (OAST), CRCL developed and implemented Memoranda of Agreement (MOA) with four participating Components dictating the process for storing medical documentation to support requests for reasonable accommodation within the ACMS. CRCL also collaborated with OAST in the development of ACM 2.0 to ensure that enhancements were consistent with the reporting requirements for reasonable accommodations and personal assistance services as outlined in Section 501 of the Rehabilitation Act of 1973, as amended.
- The DHS Corporate Recruitment Council (CRC), comprising personnel from DHS Components, coordinated DHS’s recruiting presence across Components with respect to many organizations in FY 2018, including the following:
 - Women in Federal Law Enforcement
 - National Asian Peace Officers Association
 - National Organization of Black Law Enforcement Executives
 - National Native American Law Enforcement Association
 - League of United Latin American Citizens
 - Hispanic Associations of Colleges and Universities
 - Hispanic American Police Command Officer Association
 - Society for American Indian Government Employees

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All of the priority events identified by the CRC within the Top 25 List were attended by DHS. Seven of nine Components participated in at least one event on the Top 25 List.

- DHS continued use of the Pathways Programs (Pathways), the federal government’s primary entry point for students and recent graduates. In FY 2018, DHS hired 346 Pathways student interns, 71 recent graduates, and 11 Presidential Management Fellows, totaling 428 Pathways participants. Of these, 42.5 percent identified as members of a minority racial or ethnic group, and 52.1 percent were women.
- DHS held a Women in Law Enforcement Recruitment and Hiring event in June 2018 in Arlington, Tex., attended by almost 2,000 highly qualified individuals. Subsequent to the event, the Department issued 755 tentative job offers to fill critical vacancies across the Department.
- DHS continued its usage of Strategic Outreach and Recruitment Strategy (SOAR). One of the key tools to execute the SOAR plan is the Component Recruitment and Outreach Plans (CROPs). Once the CROPs are completed, DHS assesses the CROPs against a checklist to ensure activities are aligned with the SOAR, DHS Inclusive Diversity Strategic Plan, and diversity reports (*e.g.*, FEORP, DVAAP, etc.). The FY 2019 CROPs will be used in conjunction with the DHS Recruiting, Outreach, and Marketing Matrix (ROMM) to forecast events to ensure short and long-term recruitment planning.

DHS issues the CROPs annually to assist Components with short and long-term planning for mission critical occupations. The FY 2018 CROP contained Component recruiting and outreach information for the upcoming fiscal year’s activities focused on diverse populations, to include IWD and IWTDs. Components provided details on planned activities to attract IWD and IWTDs, which are then validated in the ROMM. In FY 2018, all DHS Components submitted its CROP in a timely manner.

- CRCL’s Director for Equal Employment Opportunity and Diversity:
 - 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 staff represented CRCL on the OPM Applicant Flow Data Group, a platform for interchange between federal agencies and OPM on the needs of agencies and the evolving capabilities of OPM to provide job applicant flow data. The DMS used applicant flow data to complete the required MD-715 report data tables and in conducting data analyses.
 - Ensured coordination, effectiveness, and efficiency in Departmental and Component EEO and civil rights programs, by developing and deploying advanced barrier analysis training to special emphasis program managers with MD-715 reporting and data management responsibilities. The completion of

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Phase II of the barrier analysis training in June 2018 supported the activities and measurable actions defined under the DHS EEO Directors Council Strategic Plan, FY 2016 – FY 2020.

- Collaborated with the Pride in Federal Service Interagency Working Group, a forum for sharing resources and materials in support of lesbian, gay, bisexual, transgender, and gender nonconforming inclusion in federal employment. DHS shared its Special Emphasis Program Directive and Instruction with the group and its sponsored programs with DHS Pride members, notably CRCL’s Pride Month program, “*The Intersect of Race and Gender in the LGBT Community*” as examples of its support of the LGBT workforce.
- Served as the principal on the Interagency Working Group on Women and Girls in Science, Technology, Engineering, and Mathematics (STEM) and lent support on projects designed to address the distinctive concerns of women and girls, including persons of color and those with disabilities, in STEM. CRCL staff actively participated in the monthly Interagency Working Group meetings led by the U.S. Department of Energy. Examples of DHS’s STEM related program support include Customs and Border Protection’s (CBP) participation in the International Day of the Girl by hosting activities at its Springfield, VA Laboratory. DMS staff also participated in the 4th Annual Interagency STEM Volunteer Fair in December 2017. This volunteer fair afforded federal employees and contractors an opportunity to meet STEM organizations and school officials in the D.C., Maryland, and Virginia area that sought volunteer support. The organizations informed attendees of their current needs, upcoming events, and areas of focus. This volunteer opportunity will afford government employees an opportunity to use their talents to inspire the future STEM workforce through their volunteerism. The announcement of this event was published on DHS Connect and distributed by email Department-wide.
- Ensured the deployment of the DHS 2018 Campaign to Resurvey the Workforce on DHS Connect to encourage DHS employees to review and update their disability status in an effort to ensure DHS is accurately documenting and tracking progress in achieving employment goals for individuals with disabilities. Coordinated the effort with all Component Heads, OCHCO, the Human Capital Leadership Council, and the EEOD Council. As a result, 788 permanent employees updated their disability profiles. These updates resulted in an overall increase of 555 disability designations (Self-ID Disability), and 57 targeted disability designations when compared to our baseline. At the end of the resurvey, DHS total permanent participation rates increased for both individuals with disabilities (IWDs) from 10.38% to 10.71% and individuals with targeted disabilities (IWTDs) from 1.27% to 1.29%.
- Ensured that the Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals with Disabilities continued as a major effort within every DHS

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Component during FY 2018. In support of these efforts, CRCL provided ongoing guidance, technical assistance, and feedback to all DHS Components to ensure progress in complying with the new obligations outlined in Section 501 of the Rehabilitation Act. DHS also maintained a Section 501 tracking mechanism to coordinate activities across the Department and to manage and monitor progress in achieving full compliance with the final rule amending the regulations implementing Section 501 of the Rehabilitation Act. CRCL hosted quarterly meetings with the DHS Disability Employment Advisory Council and invited guest speakers to share promising practices on disability mentoring programs. DHS was involved in various recruiting initiatives targeting persons with disabilities throughout FY 2018, including the Workforce Recruitment Program and the Operation Warfighter Program.

- Ensured the compilation and release of an updated Disability Employment Fact Sheet. This Fact Sheet provided Component hiring officials with comprehensive information on increasing the employment of persons with disabilities and served 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, references to DHS Annual Affirmative Action Plan, guidance on Personal Assistance Services, and DHS’s annual disability hiring goals.
- 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.
- Continued engagement by supporting and participating in events and activities sponsored by the White House Initiative (WHI) on Historically Black Colleges and Universities (HBCU). This included ensuring that staff represented DHS at the HBCU Week Conference Career Fair for HBCU students and alumni. DHS, along with the Department of Justice, led an HBCU cluster which was created to identify opportunities and address obstacles impacting the efforts of HBCUs to protect their campuses, students and communities. The Campus Safety and Security Cluster works closely with the HBCU Law Enforcement Executives Association and campus emergency management personnel to improve and increase HBCU campus preparedness and resilience through the provision of grants, resources, emergency management curriculum development, and training to faculty, staff, and students. The WHI HBCU recognized DHS and the CRCL Departmental Special Emphasis Program Manager with the first annual Excellence in Innovation and Competitiveness Award.
- Partnered with OCHCO to convene an outreach event, “Spring Break: *Make Your Impact While DHS Secures the Homeland.*” The day-long event included moderated

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morning and afternoon panels composed of DHS employees in STEM, law enforcement, security, management, administrative, and professional occupations. The Office of Personnel Management (OPM) provided information to students about the Pathways Program. DHS recruiters critiqued student resumes. Students from minority serving institutions, two-year colleges, and Gallaudet University attended.

- Published and disseminated *Focus on EEO and Diversity*, a DHS EEOD community newsletter. Each edition included summaries of significant U.S. Supreme Court, federal court, and/or administrative decisions affecting the adjudication of EEO complaints; provided relevant and updated guidance on significant case processing issues; and discussed important or cutting-edge 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.
- 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.
- In support of DHS workforce recruiting, provided advice and guidance for the DHS Women in Law Enforcement Recruitment and Hiring Event; led the Accessibility and Reasonable Accommodation team that ensured full accessibility of facilities and technology, including coordination of all materials in accessible formats, interpreting services for the two-day event, and captioning access real-time translation (CART) for all workshops. CRCL provided technical advice and guidance to other teams and to event participants.
- Represented the Department on the Federal Inter-Agency Holocaust Remembrance Committee Planning Team, which arranged for Holocaust Survivors to speak during the Days of Remembrance; DHS also contributed the awards that were given to honor the speakers.

Essential Element D – Proactive Prevention

- DHS again conducted an annual self-assessment to monitor progress of its affirmative employment programs; identified areas where barriers may operate to exclude racial, national origin, or gender groups, or qualified individuals with disabilities; and developed strategic plans to mitigate or eliminate these identified barriers.
- CRCL provided EEO, anti-harassment, reasonable accommodation, and conflict resolution training for DHS HQ employees. CRCL developed supervisory and non-

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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)¹ New Employee Orientation programs.
- CRCL provided quarterly EEO training for supervisors participating in OCHCO's and the OIG HR Essentials Training programs.
- CRCL's training cadre delivered EEO and Diversity training to DHS Headquarters Components. The training cadre consists of supervisory and non-supervisory employees.
- CRCL led the efforts to ensure that all DHS employees received mandatory harassment training. Ninety-five percent of DHS employees completed the mandatory training in FY 2018.
- DHS's Disability Employment Program:
 - For FY 2018, DHS established (department-wide and for each Component) hiring goals of 12 percent for IWDs and two 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. For FY 2018, 10.4 percent of new hires were IWDs and 1.7 percent were IWTDs in non-law enforcement related and non-TSO positions. While the Department did not meet the new hire goals with either group, DHS ended the fiscal year with IWDs representing 10.45 percent of the total workforce and IWTDs representing 2.4 percent (excluding law enforcement and TSO occupations) both showing increases from FY 2017 (9.9 percent and 2.1 percent), respectively. In FY 2018, DHS hired a total of 225 employees using its Schedule A Hiring Authority under 5 C.F.R. § 213.3102 (and TSA's equivalent hiring authority). Schedule A hires were 1.6 percent of all new hires in non-law enforcement related and non-TSO positions, exceeding the goal and increasing by 35 percent from 2017. Ensuring that employment of IWDs/IWTDs was a fixed agenda item for the DHS Corporate Recruitment Council was a significant driver of this progress.
 - DHS continued to partner with the Department of Defense (DoD) Computer/Electronic Accommodation Program (CAP) to provide assistive

¹ On November 16, 2018, President Trump signed into law the Cybersecurity and Infrastructure Security Agency Act of 2018. Under this landmark legislation, the National Protection and Programs Directorate (NPPD) became the Cybersecurity and Infrastructure Security Agency (CISA).

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technology accommodation solutions to DHS employees throughout DHS. During FY 2018, CAP provided 283 accommodations DHS-wide to 126 employees, resulting in a cost savings of \$89,857.11 for DHS.

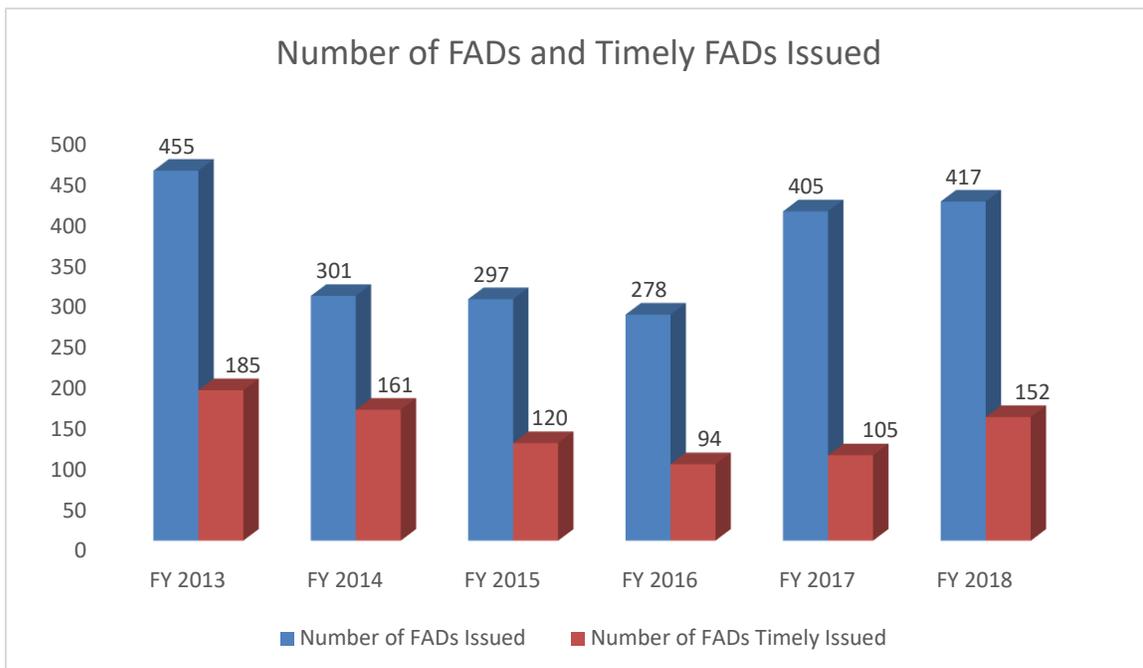
Essential Element E - Efficiency

- During FY 2018, Components' usage of the DHS Shared Neutrals Program increased by over 40 percent compared to FY 2017, resulting in an estimated cost savings of \$60,000.00 for DHS.
- CRCL conducted two 90-minute refresher trainings for all mediators on the shared neutrals roster.
- In FY 2018, the DHS HQ Anti-Harassment Unit (AHU) case processing time was reduced 30 percent, despite an increase in the number of complaints received.
- During FY 2018, 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, developed and launched by CMAS in FY 2016, allowed CMAS's Adjudication Analysts to assess and rate the quality of ROIs reviewed when preparing Final Agency Decisions (FADs). Analysts assigned numerical ratings for several criteria related to legal sufficiency and readability, and provided narrative information if needed to further explain numerical ratings.
- 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 on the nominees, including, but not limited to, having engaged in discriminatory conduct. During FY 2018, CMAS vetted over 3,600 employees. CMAS dedicated additional internal resources to this area and completed 96 percent of vetting requests by their requested due date.
- The CMAS compliance program monitors Components' implementation of remedial relief that has been ordered in findings of discrimination, and reports compliance progress to the EEOC for EEOC-issued decisions in which discrimination was found. During FY 2018, CMAS collaborated with the EEOC's compliance officer to establish and implement new reporting requirements for all DHS Components based on newly revised EEOC guidelines. The CMAS compliance officer conducted training for all DHS Components' compliance managers on the new procedures.
- EEOC Regulations, at 29 C.F.R. Part 1614, generally require merit FADs to be issued within 60 days of election of, or after failure to timely 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 2018, CMAS issued or

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administratively closed 940 final agency actions, including 417 merit FADs. DHS had an internal performance measure goal to issue 40 percent of merit FADs by their regulatory due date. Further, CMAS amassed an inventory of pending merit FADs during the year. CMAS used a triage system for the sake of efficiency to address its inventory. To 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 had a positive impact on the issuance of merit FADs in FY 2018. At the conclusion of FY 2018, CMAS was more sufficiently staffed with analysts and support staff.



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

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

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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 2018 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 2018, the AHD processed 6,600 help desk requests.
- *Training Development/Delivery*: The OAST Training Program provides awareness and training on IT accessibility related topics. OAST offered seven² different training courses and logged 2,500 course completions during FY 2018 through online, classroom, one-on-one, and hands-on trainings. In FY 2018, OAST sunset the Trusted Tester V3 training and certification in preparation for the release of completely revised courses to support the Revised Section 508 Standards. This reduced the overall volume of training delivered. Since 2013, OAST has certified over 1,300 Trusted Testers worldwide.
- During FY 2018, OAST collaborated with members of the Federal Chief Information Officers Council 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 increased the flexibility of the test process overall. The Trusted Tester V5 training and certification content update is scheduled for a FY 2019, first quarter release. Additionally, OAST led the Accessibility Community of Practice Accessible Electronic Document authoring and evaluation best practices group to update these best practices to support the Revised Section 508 Standards and the Microsoft Office 365 environment.
- *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 2018, OAST tested 53 IT and Web-based applications for Section 508 compliance. To support equal access to information and data for persons with disabilities, the Continuous Diagnostics and Mitigation office collaborated with OAST to improve the accessibility of key tools. Over the past year, the team closed approximately half of the accessibility gaps, dramatically increasing accessibility for people with disabilities. OAST also tested 371 electronic documents and assisted in ensuring those documents were made accessible as needed.

² 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).

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- *Governance:* During FY 2018, OAST updated how Section 508 compliance was integrated within acquisition and change control policies and procedures to support the Revised Section 508 Standards, and to streamline IT governance overall. The DHS Accessibility Requirements Tool (DART) was updated to significantly strengthen contractual requirements for Section 508 compliance DHS-wide. The DHS Interagency Change Control Board (ICCB), DHS HQ change control governance review procedures, and DHS enterprise architecture review procedures were aligned to reduce the level of effort to conduct governance activities and increase the value of such review activities. Overall, OAST reviewed 453 IT acquisitions valued at \$1,594,264,048.00 and 3,292 change control and enterprise architecture requests.

Part E.3 - Executive Summary: Workforce Analyses

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 and their separation is pre-destined making their inclusion less relevant to our analysis of employee movements 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 DHS

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Components were cross-walked to the GS scale. This approach has been in place since 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 NCLF and RCLF statistics are provided as benchmarks. The NCLF consists of all persons over 16 years of age, who are not institutionalized or on active duty in the armed forces, and who either have a job or want a job. The RCLF is a weighted average of demographic statistics pertaining only to occupations seen within DHS.

The total permanent DHS workforce increased by 4,259 employees (2.32 percent) from 183,966 in FY 2017 to 188,225 in FY 2018.

DHS Permanent Workforce Trend for Hispanic Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY18	16.2%	14.4%	12.9%	14.5%	9.3%	14.1%	21.9%	11.2%	5.8%
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%
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. In FY 2018, 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 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.

Hispanics constitute 30 percent of the CBP Officers and over half of Border Patrol Agents. 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

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comparison. This job requirement, in conjunction with the high percentage of jobs being located in the southwest Border States, greatly increases Hispanic male and female representation in these occupations.

DHS Permanent Workforce Trend for Hispanic Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY18	6.4%	9.8%	7.2%	8.0%	1.6%	10.3%	5.9%	3.7%	1.9%
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 – 6.4% of DHS, 4.8% 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 2018 and were above the NCLF and RCLF participation rates. The attrition rate also increased in FY 2018 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 pay grades GS 5-9 and participated 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	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY18	37.9%	29.4%	35.1%	34.3%	52.0%	25.7%	38.6%	47.1%	55.7%
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 – 37.9% of DHS, 38.3% of National Civilian Labor Force, 43.4% of Relevant Civilian Labor Force									

The White male workforce participation rate at DHS continued to decline in FY 2018. It dipped below the NCLF rate in FY 2018, and remained below the RCLF rate. The hiring rate was well below the participation, NCLF, and RCLF rates, while the promotion rate continued to be below the workforce participation rate.

White males’ participation rate was lower than the expected rate at the GS 5-9 pay grades and at a higher than expected rate at all other pay grade ranges, including Executive/Senior Leader grades. The participation rate at grades GS-13 to 15 has been gradually trending downward for the White male group; at the Executive/Senior Leader level, the participation rate has been roughly steady for the past three years.

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DHS Permanent Workforce Trend for White Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY18	15.5%	16.2%	17.6%	17.3%	9.2%	17.5%	13.2%	17.1%	21.5%
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 – 15.5% 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 slowly 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.

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DHS Permanent Workforce Trend for Black Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY18	7.7%	9.1%	9.3%	8.3%	17.7%	9.8%	6.7%	6.8%	5.8%
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%
Black Males – 7.7% 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 remained well above the NCLF and RCLF participation rates, although the hire rate has declined in the past two years. This group has increased representation in grades GS 13-15 since FY 2010, although participation was below the overall representation rate and dropped at the Executive/Senior Leader level. The promotion rate continued to exceed the participation rate and continued to rise in FY 2018.

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DHS Permanent Workforce Trend for Black Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY18	8.6%	12.1%	10.2%	9.4%	5.7%	13.5%	6.2%	7.3%	4.0%
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 – 8.6% 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 since FY 2010 and remained above the NCLF and RCLF participation rates. The group was hired at a rate that was above the NCLF and RCLF. The promotion rate was above its representation in the workforce. However, black females had a higher than expected attrition rate. This group also had lower than expected participation in higher-graded positions but is trending upward since FY 2010 in GS 13-15 positions and held constant at the SES/Senior Leader level. The group had higher participation in grades 5-9.

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DHS Permanent Workforce Trend for Asian Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY18	3.7%	4.1%	3.7%	3.7%	2.2%	4.1%	3.9%	3.2%	2.0%
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 – 3.7% of DHS, 2.0% of National Civilian Labor Force, 2.6% of Relevant Civilian Labor Force									

In FY 2018, 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 and promotion rates were at parity with their participation rate.

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

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DHS Permanent Workforce Trend for Asian Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY18	1.9%	2.1%	1.6%	2.2%	0.8%	2.2%	1.6%	2.1%	1.7%
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%
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 2018, the attrition rate rose slightly, remaining below the participation rate.

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

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DHS Permanent Workforce Trend for Pacific Islander Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY18	0.34%	0.41%	0.44%	0.36%	0.00%	0.47%	0.36%	0.20%	0.33%
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, 0.07% of National Civilian Labor Force, 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 previous fiscal years but has increased each year since FY 2016 rising above the participation rate.

Native Hawaiian/Pacific Islander males’ promotion rate exceeded their participation rate in FY 2018. Representation at grades 13-15 remained below the participation rate but has been slowly trending upward since FY 2010. Executive/Senior Leader representation has risen to almost match the overall participation rate.

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DHS Permanent Workforce Trend for Pacific Islander Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY18	0.23%	0.36%	0.27%	0.24%	0.00%	0.49%	0.18%	0.08%	0.00%
FY17	0.22%	0.37%	0.31%	0.35%	0.00%	0.48%	0.17%	0.08%	0.00%
FY16	0.22%	0.51%	0.31%	0.17%	0.12%	0.47%	0.16%	0.07%	0.00%
FY15	0.20%	0.37%	0.19%	0.16%	0.11%	0.41%	0.16%	0.07%	0.00%
FY14	0.18%	0.22%	0.23%	0.32%	0.09%	0.36%	0.15%	0.06%	0.00%
FY13	0.18%	0.50%	0.32%	0.15%	0.00%	0.35%	0.15%	0.06%	0.00%
FY12	0.17%	0.39%	0.18%	0.11%	0.00%	0.31%	0.14%	0.06%	0.00%
FY11	0.15%	0.29%	0.12%	0.10%	0.00%	0.24%	0.14%	0.05%	0.00%
FY10	0.23%	0.36%	0.27%	0.24%	0.00%	0.49%	0.18%	0.08%	0.00%
Pacific Islander Females – 0.23% of DHS, 0.07% of National Civilian Labor Force, 0.08% of Relevant Civilian Labor Force									

Note: In preparation of the FY 2018 MD-715 report, the team noticed that the percentages reported for Pacific Islander Females in the FY 2017 report are in error. All percentages have been corrected in the table above. The workforce tables included with the FY 2017 report are correct. Only the trend table in the Executive Summary was affected.

Native Hawaiian/Pacific Islander females’ participation and hire rates continue to exceed the NCLF and RCLF. The attrition rate decreased in FY 2018, but remains 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.

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DHS Permanent Workforce Trend for Native American Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY18	0.61%	0.51%	0.59%	0.54%	0.67%	0.53%	0.62%	0.64%	0.87%
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 below the participation rate, which held steady at 0.61 percent.

Native American males were represented evenly throughout the range of pay grades. The participation rate at the Executive/Senior level decreased from 1.00 percent to 0.87 percent. The change reflected the number of employees at this pay level decreasing from 9 to 8 in FY 2018.

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DHS Permanent Workforce Trend for Native American Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY18	0.29%	0.41%	0.40%	0.32%	0.00%	0.45%	0.23%	0.23%	0.11%
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, 0.5% 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 their participation rate. Their promotion rate was slightly above the workforce participation rate. Native American females were overrepresented at grades 5-9 and underrepresented at all other grade levels.

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

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Summary of Triggers Identified in Workforce Trend Tables (FY10-18) Entries indicate a trigger; No entry indicates no trigger					
Group	% of Permanent Workforce	% of Hires	% of Attrition	% of Promotions	% of GS13-Exec/Sr Lead
Hispanic Male				Slightly Below Goal No Change	Below Goal No Change
Hispanic Female			Above Goal Trending Up		Below Goal Trending Up
White Male	Slightly Below Goal Trending Down	Below Goal Trending Down		Below Goal Trending Down	
White Female	Below Goal Trending Down	Below Goal Trending Down	Above Goal Trending Down		
Black Male			Above Goal Trending Up ³		Below Goal Trending Up (GS13-15)); No Change (Executive/SL)
Black Female			Above Goal No Change		Below Goal Trending Up
Asian Male					Below Goal Trending Up
Asian Female					
Pacific Islander Male*			Above Goal Trending Up		Below Goal Trending Up
Pacific Islander Female*			Above Goal No Change		Below Goal No Change
Native American Male*		Below Goal No Change		Below Goal No Change	
Native American Female*	Below Goal No Change		Above Goal Trending Down		Below Goal No Change

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

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Higher than expected attrition rates, especially for women, and lower than expected participation rates in the higher pay grades for almost all minority groups are significant in FY 2018. For attrition, several of the groups that have a trigger are trending to a higher attrition rate. Increasing attrition rates for some minority groups could be due in part to the increasing workforce participation rates for the same groups. However, attrition rates above the participation rates remain as triggers.

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 have a disproportionate impact on women, who frequently assume primary care-taker roles for children, the ill, and the elderly.⁴ The 2018 Best Places to Work ranked DHS 17th out of 17 large agencies.⁵ The overall score of 53.1 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 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 higher pay grades, is seen in eight of the ten minority groups. Five of the eight groups are continuing to trend towards higher representation. Three groups, Black females, Hispanic males, and Hispanic females, are participating at a significantly lower than their expected rates in the higher pay grades.

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 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 include low representation of groups at higher grades.

³ The rate decreased by 0.2% in FY 2018 after several years of slow, steady increases. However, the overall trend for the period is upward.

⁴ EEOC Women's Work Group Report, 2011.
https://www.eeoc.gov/federal/reports/women_workgroup_report.cfm

⁵ DHS raised its score this year by 6.2 points but remained last among all large federal agencies.

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DHS 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 became 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.

DHS Permanent Workforce Trend for Individuals with Disabilities									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY18	10.5%	11.0%	11.7%	12.1%	7.4%	9.3%	9.8%	12.1%	8.4%
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 – 10.5% of DHS, 16.0% 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 2018, rising to 10.5 percent for the permanent workforce, and 16.0 percent when excluding law enforcement occupations (including TSOs that have physical entry requirements). These percentages include employees that self-identify as having a disability, 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, in recent years, separated at higher rates than their workforce participation rate, with the gap increasing in FY 2018. Hires dropped one percent, while the promotion rate exceeded parity, in FY 2018. Employees with disabilities are close to parity across the pay grades and are notably above parity in the GS 13-15 grades, with

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representation in higher pay grades continuing to climb. Employees with disabilities are participating at a lower than expected rate at the Executive/Senior Leader level, but with a continuing increasing trend.

DHS Permanent Workforce Trend for Individuals with Targeted Disabilities									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/Senior Leader
FY18	1.28%	1.03%	1.57%	1.20%	2.2%	1.4%	1.1%	1.3%	1.2%
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, 1.99% excluding LEOs and TSA TSOs, 1.12% of the Federal Government, 2.0% EEOC Goal									

The percentage of the DHS workforce that self-identifies as having a targeted disability is above the Federal Government workforce benchmark, but remains below the EEOC goal of 2.0 percent. The participation rate has steadily climbed since FY 2010, increasing from 1.02 percent in FY 2010 to 1.28 percent in FY 2018. Excluding law enforcement officers and TSOs, the FY 2018 rate is 1.99 percent, almost equaling the EEOC goal. Hires decreased in FY 2018 and remain below the 2.0 percent federal goal. The attrition rate is above the participation rate.

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

DHS Employee Engagement

DHS has annually administered the OPM Federal Employee Viewpoint Survey between FY 2005 and FY 2018. In FY 2016, after six straight years of decline, the employee engagement index increased three percent, from fifty-three percent in FY 2015, to fifty-six percent. In FY 2017, DHS continued this trend, and the employee engagement index increased four percent to sixty percent. In FY 2018, the index remained at sixty percent, with DHS still below the

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government-wide rate of employee engagement by eight percent. DHS remains below the government-wide rate of employee engagement by seven percent. The Inclusion Index increased one percent in FY 2018 for DHS to fifty-three percent, yet remains eight percent below the government-wide rate.

The overall DHS score is largely driven by TSA and CBP employees. Employees in these components account for 56.2 percent of DHS's completed surveys. Some DHS Components showed higher employee satisfaction than the average. 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 continued to be a strong predictor. DHS employees with disabilities provided more negative responses to almost all questions in the survey.

Women in Law Enforcement

Historically, DHS relied largely on workforce data and did not include employee input when identifying barriers to equal employment opportunity in its workforce. In a report to Congress⁶, 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 of 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, 15.55 percent⁷, and even lower than that seen in the occupational CLF benchmark for criminal investigators, 12.4 percent.

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 National Women's History Month. These programs highlighted some of the challenges that women in law enforcement have faced, and how women have handled those challenges.

⁶ 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.

⁷ Bureau of Justice Statistics, *Census of Federal Law Enforcement Officers*, 2008.

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Following the Deputy Secretary's approval of the study and its related recommendations, in accordance with the related communications plan for the study, the Deputy Secretary, CRCL Officer and EEO Director relayed the study's findings in presentations to the workforce and partners. CRCL engaged the Deputy Secretary as the featured speaker at the Department-wide Women's History Month Program where she announced the study's recommendations. Other actions taken by CRCL included:

- Sponsored the 2018 Women's History Month Program, "Honoring Women Who Protect the Homeland," which featured the Deputy Secretary and senior-level women from ICE, TSA, USCIS, and USSS. The program, video-teleconferenced across the Department, included a moderated panel discussion focused on career progression, challenges, and successes.
- Presented a Women in Law Enforcement panel at the 2018 EEOD Training Conference during which findings and recommendations from the study were described and analyzed. The panel facilitated by DMS included senior-level women from FLETC, ICE, TSA, USSS, and Women in Federal Law Enforcement (WIFLE), who discussed career advancement, workplace challenges and successes, followed by a moderated question and answer segment. Workshop participants received copies of the DHS Women in Law Enforcement Study Executive Summary.
- Participated in the WIFLE Foundation 2018 19th Annual Leadership Training and networking in support of outreach to women. CRCL staff attended and participated in the WIFLE Training Conference and provided informal briefings on the Women in Law Enforcement Study, its findings and recommendations, and the deployment of a cross-agency mentoring program for women law enforcement officers in DHS. CRCL staff, along with senior level women from public and private sector organizations, served as mentors during a flash mentoring program during the training conference.
- As a member of the Intelligence Community Equal Employment Opportunity (IC EEO) Council, the DHS EEO Director briefed the IC EEO Council leaders on the Women in Law Enforcement Study, its findings and recommendations.
- Coordinated invitation to WIFLE, National Organization of Black Law Enforcement Executives, National Asian Peace Officers Association, Hispanic American Police Commanders Association, National Native American Law Enforcement Association, and Association of Customs and Homeland Security Investigations Special Agents to serve as mentors to DHS women law enforcement officers.
- Conducted outreach to DHS OCHCO to identify persons to assist in the development and deployment of the cross-agency mentoring program for DHS women law enforcement officers; coordinated with Strategic Recruitment Diversity and Inclusion, Human Capital Policy and Programs, and the Chief Learning Officer.

Data Sources

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The workforce numbers used in this report were obtained using DHS's workforce data application, AXIS, and are based on an extraction from National Finance Center (NFC) data for Pay Period 19, which ended September 29, 2018. DHS employees voluntarily submitted all race, national origin, gender, and disability data relied upon in this report. To better capture the number of IWDs, 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 workforce tables as having a non-targeted disability. Statistics on IWD/IWTD in the federal government were obtained from the OPM 2015 Report on the Employment of Individuals with Disabilities in the Federal Executive Branch⁸.

Applicant flow data presented in this report were extracted from USA Staffing, which is used by four of the nine DHS Components: CBP, ICE, 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 and were obtained by separate data extract or data call to the relevant Components. Applicant flow data were not obtained from the Federal Emergency Management Agency (FEMA) in time to include in the Department level report. The analysis team also learned that applicant flow data for competitively announced SES positions are not included in the data extracts. DHS is pursuing applicant flow data for SES positions from the relevant servicing offices. DHS continues to work towards developing a central repository for all applicant flow data.

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

EEO complaint numbers were obtained via complaint data collected by DHS and its Components and stored in 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 from OPM, then made available to CRCL for analysis purposes.

Conclusion

DHS leadership is proud of its accomplishments in the areas of attracting, developing, and retaining an increasingly diverse workforce. DHS's overall increase in the representation of women, minorities, and individuals with disabilities, is a significant accomplishment. This report identified accomplishments, but also identified several challenges still requiring attention, to include: establishing an effective career development program; improving the 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 address these issues.

⁸ <https://www.opm.gov/policy-data-oversight/diversity-and-inclusion/reports/disability-report-fy2015.pdf>.

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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, 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.

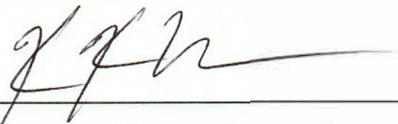
I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.



7/08/2019

Signature of Principal Equal Employment Opportunity
Director/Official
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

Date



07/08/19

Signature of Agency Head or Agency Head Designee
Kevin K. McAleenan
Acting Secretary, U.S. Department of Homeland Security

Date

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Part G: Agency Self-Assessment Checklist

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

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

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

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

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

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MD-715 - PART G Agency Self-Assessment Checklist

Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP					
This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.					
 Compliance Indicator	 Measures		Measure Met? (Yes/No/NA)	Comments	Current Part G Questions
A.1.a	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "yes", please provide the annual issuance date in the comments column. [see MD-715, II(A)]		No- Department, ICE, HQ	The Department did not meet this measure in FY 2018. ICE Since the departure of the agency head on January 20, 2017, ICE has had an acting head. The Office of Diversity and Civil Rights (ODCR) will issue a new policy upon confirmation of the new ICE Director. HQ See HQ corresponding Part H	A.1.a.2
A.1.b	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]		Yes		New
 Compliance Indicator	 Measures		Measure Met? (Yes/No/NA)	Comments	
	A.2 – The agency has communicated EEO policies and procedures to all employees.				

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A.2.a	Does the agency disseminate the following policies and procedures to all employees:			
A.2.a.1	Anti-harassment policy? [see MD 715, II(A)]	No-ICE	ICE is currently utilizing the old AHP policy, dated July 6, 2010. The new policy/directive is being revised with the implementation of the Anti-Harassment Program.	New
A.2.a.2	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	Yes		New
A.2.b	Does the agency prominently post the following information throughout the workplace and on its public website:			
A.2.b.1	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]	Yes		New
A.2.b.2	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	Yes		A.2.c
A.2.b.3	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	No-HQ	<p>DHS (Departmental) https://www.dhs.gov/reasonable-accommodations-dhs</p> <p>CBP https://www.cbp.gov/about/eo-diversity/reasonable-accommodation</p> <p>ICE https://insight.ice.dhs.gov/direct/dcr/Pages/index.asp</p> <p>USCG https://www.uscg.mil/Family/Civil-Rights/faq/</p> <p>TSA Internal https://office.ishare.tsa.dhs.gov/sites/WPED/WPED_Info</p>	A.3.c

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			<p>Center/SitePages/ReasonableAccommodations.aspx Externalhttps://www.tsa.gov/about/jobs-at-tsa</p> <p>USCIS https://www.uscis.gov/about-us/affirmative-action-plan-recruitment-hiring-advancement-and-retention-persons-disabilities</p> <p>USSS https://www.secretservice.gov/join/diversity</p> <p>FLETC https://www.fletc.gov/sites/default/files/imported_files/employment/ReasonableAccommodationRequestProcedures.pdf</p>	
A.2.c	Does the agency inform its employees about the following topics:			
A.2.c.1	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often.	Yes	<p>CBP Quarterly in pay stubs; posters are posted in duty stations; information and FAQs posted prominently on cbp.gov; and notice of EEO rights are identified in any action letters.</p> <p>USCG</p> <ul style="list-style-type: none"> • Orientation • Biennially – No FEAR Act • Triennially – Civil Rights Awareness Training <p>TSA Provided at least once every 2 weeks/26 times per year</p>	A.2.a

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			<p>during new hires orientation in addition to our Bi-Annual No FEAR training.</p> <p>USCIS informs its employees about the EEO process when they onboard and, thereafter, annually.</p> <p>USSS New Employee Orientation-biweekly, EEO related Trainings-quarterly, during EEO Intake Process, and EEO Poster through HQ and field offices, and internal and external webpages.</p>	
A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Yes	<p>CBP At least annually in pay stubs; information and FAQs posted prominently on cbp.gov; and Complainants are notified during the complaint process.</p> <p>ICE Policies are disseminated during the bi-weekly New Employee Orientation, and information is on the ODCR intranet page.</p> <p>USCG</p> <ul style="list-style-type: none"> • Orientation • Triennially – Civil Rights Awareness Training <p>TSA Provided at least once every 2 weeks/26 times per year during new hires orientation in addition to our Bi-Annual No FEAR training.</p>	New

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			<p>USCIS Bi-annual ADR training is administered to managers. Information is available for employees on OEOIs Connect page.</p> <p>USSS New Employee Orientation (biweekly), EEO related trainings (quarterly) during EEO Intake Process, Early Dispute Resolution Program (EDRP) brochure, and EEO posters displayed throughout USSS HQ and field offices, resident offices and resident agencies, and USSS internal and external webpages.</p>	
A.2.c.3	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Yes	<p>CBP At least annually in pay stubs; information and FAQ posted prominently on cbp.gov; and on-going RA training for managers and employees</p> <p>ICE Policies are disseminated during the bi-weekly New Employee Orientation, and information is on the ODCR intranet page.</p> <p>USCG -Orientation -Triennially – Civil Rights Awareness Training</p> <p>TSA HR Essentials Module on Reasonable Accommodation presented via adobe connect twice per yr.</p>	New

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			<p>Reasonable Accommodation information provided during new hires orientation. Provided once every 2 weeks/26 times per year.</p> <p>Reasonable Accommodation awareness provided to components upon request.</p> <p>USCIS Quarterly Supervisor Training and semi-annual employee overview.</p> <p>USSS New Employee Orientation-biweekly, EEO related Trainings-quarterly, during EEO Intake Process, and EEO Poster through HQ and field offices, and internal and external webpages.</p>	
<p>A.2.c.4</p>	<p>Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.</p>	<p>Yes</p>	<p>CBP At least annually with issuance of Anti-Discrimination and Anti-Harassment Policy Statement; and ongoing EEO training.</p> <p>ICE The agency provided anti-harassment training to all employees this year. It has not been determined how often the training will be conducted, going forward.</p> <p>USCG -Orientation -Annually with issuance of Anti-Discrimination and Anti-Harassment Policy Statement annually.</p>	<p>New</p>

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			<p>-Biennially – No FEAR Act -Triennially – Civil Rights Awareness Training -Other courses are targeted for managers and supervisors.</p> <p>TSA Annual Mandatory OLC training and onsite briefings upon request.</p> <p>USCIS Annually, in Director’s statement.</p> <p>USSS New Employee Orientation-biweekly, EEO related Trainings-quarterly, during EEO Intake Process, and EEO Poster through HQ and field offices, and internal and external webpages.</p>	
A.2.c.5	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If “yes”, please provide how often.	Yes	<p>USCG Communicated throughout the Agency on a regular bases, during training, and reaffirmed in the CG Civil Rights Manual.</p> <p>TSA MD1100.73.3 was recently signed in August 16, 2017 and broadcasted to all employees via email. In addition, we provide new employees training every two weeks.</p> <p>USCIS Anti-harassment training is required for all new employees and the EEO Policy statement reaffirms that there is disciplinary action for inappropriate behaviors.</p>	A.3.b

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		<p>USSS Information is continuously updated on the agency's website.</p> <p>USSS Office of Integrity manual, ITG-04, informs the workforce about unacceptable behaviors and associated penalties. Additionally, the Office of Integrity publishes an annual Discipline Analysis Report. This report provides statistics and an analysis of the ITG discipline program and is designed to provide an overview of disciplinary actions taken by the ITG deciding official. It also identifies trends in misconduct, trends by series, and the results of the analysis. It informs the employees where they can go to get information concerning the discipline process. This report is readily available to the workforce through the USSS Intranet homepage as well as the ITG homepage. Additionally, ITG developed a "Straight Talk" video series that is available to every employee via the USSS Intranet homepage. "Straight Talk was designed to provide all Secret Service employees with a quick reference into how the disciplinary process works through a series of brief video clips. ITG also provides regular briefings to all first line supervisors, Special Agent training classes, Uniformed</p>	
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			<p>Division recruit classes and newly assigned Inspectors to the Office of Professional Responsibility.</p> <p>CBP At least annually with issuance of Anti-Discrimination and Anti-Harassment Policy Statement; and ongoing EEO training.</p>	
 Compliance Indicator  Measures	A.3 – The agency assesses and ensures EEO principles are part of its culture.	Measure Met? (Yes/No/NA)	Comments New Compliance Indicator	
A.3.a	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.	Yes	<p>CBP Commissioner’s EEO/Diversity Award. During FY 2018, six (6) members of the JFK Diversity and Inclusion Program Committee and 13 members of the Big Bend Sector Diversity and Inclusion Program Committee received the Commissioner’s EEO/Diversity Award for championing CBP’s commitment to a bias-free work environment and exemplifying EEO principles.</p> <p>USCG</p> <ul style="list-style-type: none"> • USCG Senior Leadership Award • Affinity Groups Awards • Partnership in Education (PIE) Awards <p>ICE Director's Outstanding Achievement in Diversity Management and Core Value</p>	New

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			<p>Awards. See https://insight.ice.dhs.gov/director/awards/Pages/index.aspx</p> <p>TSA The agency’s Honorary Awards Program has an award category for Equal Employment Opportunity, Workforce Diversity and Cultural Awareness. Awards granted by the Administrator can be given to both individuals and groups. TSA also participates in the DHS CRCL Awards Program.</p> <p>USCIS The agency has Directors Awards and the program integrated an Equal Opportunity and Diversity Excellence Award into its award categories in 2018.</p> <p>USSS participates with the DHS/CRCL Diversity & Inclusion Award, which include recognition for exemplary performance in EEO for leaders, peers, employees, teams/groups.</p>	
A.3.b	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Yes		New
<p align="center">Essential Element B: INTEGRATION OF EEO INTO THE AGENCY’S STRATEGIC MISSION This element requires that the agency’s EEO programs are structured to maintain a workplace that is free from discrimination and support the agency’s strategic mission.</p>				

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 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments	
B.1.a	Is the agency head the immediate supervisor of the person ("EEO Director") who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]	No-CBP, FLETC, HQ, USCIS	<p>CBP The EEO Director reports to the Executive Director, Privacy and Diversity Office (PDO), who is under the direct supervision of the Commissioner, CBP.</p> <p>FLETC The EEO Director reports to the Chief of Staff in the Director's Office, and has unlimited access to the Director.</p> <p>HQ The EEO Director reports to the Deputy Officer of CRCL.</p> <p>USCIS The EEO Director reports to the Deputy Director of USCIS.</p>	B.1.a
B.1.a.1	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If "yes," please provide the title of the agency head designee in the comments.	No-CBP		New
B.1.a.2	Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes		B.1.d
B.1.b	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes		B.2.a
B.1.c	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comments column.	No-CBP, TSA	<p>ICE The MD-715 was presented to the head of the agency on February 23, 2018.</p> <p>USCG Senior Leadership Conference, May 30-31, 2018</p>	B.2.b

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			USCIS August 7, 2018.	
			USSS April 30, 2018.	
B.1.d	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]	No-CBP	CBP The EEO Director reports to the Executive Director, PDO. The Executive Director, PDO, is part of the Senior Management Council.	New
 Compliance Indicator  Measures	B.2 – The EEO Director controls all aspects of the EEO program.	Measure Met? (Yes/No/NA)	Comments	New Compliance Indicator
B.2.a	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]	Yes		B.3.a
B.2.b	Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)]	Yes		New
B.2.c	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes		New
B.2.d	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes	FADs are issued by DHS/CRCL for all DHS Components. Components respond N/A on this measure.	New
B.2.e	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Yes		F.3.b
B.2.f	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]	Yes		New
B.2.g	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2) and (c)(3)]	Yes		New

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 Compliance Indicator  Measures	B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.	Measure Met? (Yes/No/NA)	Comments	
B.3.a	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]	Yes		B.2.c & B.2.d
B.3.b	Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.	No-CBP	<p>FLETC Goal 2: Cultivate a diverse community.</p> <p>ICE GOAL 3: Operate an Efficient, Effective Agency; Objective A: Improve Employee Engagement; Objective B: Build and Retain a Stellar Workforce and Management Team. The narrative of both objectives speak directly to the ODCR mission.</p> <p>USCG Plan of Action (POA)</p> <ul style="list-style-type: none"> • Lead • Adopt Strategies • Hold All Accountable • Prevent • Efficient, Effective, Fair, Impartial, Enforcement of Non-discrimination Laws <p>TSA reported they "Commit to Our People: TSA's most important assets are the dedicated professionals securing our Nation's transportation</p>	New

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			<p>System. We will foster a diverse, inclusive, and transparent work environment, establishing TSA as a federal employer of choice. TSA will utilize available tools and authorities to cultivate a skilled workforce prepared and equipped to meet the challenges of tomorrow. We will transform our organizational culture to promote an entrepreneurial spirit and operational excellence.”</p> <p>USCIS One of the strategic goals is to enable our workforce to excel in a dynamic environment and the agency recognizes that leveraging the diversity of the workforce is important to achieving that goal.</p> <p>USSS Goal 2: Grow and Support A Diverse Workforce Goal 3: Identify, Develop and Empower Leaders Goal 4: Modernize Business Processes. Goal 5: Increase Communication and Collaboration</p>	
<p> Compliance Indicator</p> <p> Measures</p>	<p>B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.</p>	<p>Measure Met? (Yes/No/NA)</p>	<p>Comments</p>	

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B.4.a	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:			
B.4.a.1	to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	No-CBP		B.3.b
B.4.a.2	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	No-CBP		B.4.a
B.4.a.3	to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	No-CBP, FLETC, ICE	FLETC See FLETC Part H. ICE B.4.a.3 and B.4.a.11 are combined to form H-3, all planned activities toward completion of the objective are represented in H-3.	E.5.b
B.4.a.4	to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	Yes		B.4.f & B.4.g
B.4.a.5	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]	No-CBP		E.1.c
B.4.a.6	to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	Yes		B.4.c
B.4.a.7	to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	Yes		New
B.4.a.8	to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]	Yes		B.3.c, B.3.c.1, B.3.c.2, & B.3.c.3
B.4.a.9	to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	No-CBP	CBP Harassment complaints are tracked by CBP's Office of Professional Responsibility, which is outside of the EEO Office. However, compliance activities related to harassment complaints made through the EEO process are managed by	New

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			the EEO office (and referred to CBP's Office of Professional Responsibility).	
B.4.a.10	to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]	Yes		B.4.d
B.4.a.11	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	No-ICE	ICE B.4.a.3 and B.4.a.11 are combined to form H-3, all planned activities toward completion of the objectives are represented in H-3.	New
B.4.b	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	No-CBP, HQ	CBP EEO office is a part of the Privacy and Diversity Office (PDO), which is within the Office of the Commissioner. Within PDO there are five offices (Diversity and EEO; Freedom of Information Act; Privacy; Custody Support and Compliance; and Mission Support) which have a shared budget.	New
B.4.c	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes		B.1.b
B.4.d	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?	Yes		E.2.d
B.4.e	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	Yes		E.2.e
 Compliance Indicator  Measures	B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.	Measure Met? (Yes/No/NA)	Comments	
B.5.a	Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:			
B.5.a.1	EEO Complaint Process? [see MD-715(II)(B)]	Yes		New
B.5.a.2	Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]	Yes		A.3.d

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B.5.a.3	Anti-Harassment Policy? [see MD-715(II)(B)]	Yes		New
B.5.a.4	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	Yes		New
B.5.a.5	ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	Yes		E.4.b
 Compliance Indicator  Measures	B.6 – The agency involves managers in the implementation of its EEO program.	Measure Met? (Yes/No/NA)	Comments	New Indicator
B.6.a	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	No-CBP, HQ		New
B.6.b	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	No-CBP, HQ	CBP Barrier analysis is currently conducted by the EEO office.	D.1.a
B.6.c	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	No-CBP, HQ N/A USCIS	CBP Action plans are developed by the EEO office. USCIS Barriers have not yet been identified.	D.1.b
B.6.d	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR § 1614.102(a)(5)]	No-CBP, HQ USCIS	CBP Action plans are implemented by the EEO office.	D.1.c
Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY				
This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency's EEO Program and Plan.				
 Compliance Indicator  Measures	C.1 – The agency conducts regular internal audits of its component and field offices.	Measure Met? (Yes/No/NA)	Comments	New Indicator
C.1.a	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If	No-HQ	CBP Annual audits conducted via Self-Inspection Program, which utilizes a stratified	New

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	<p>"yes", please provide the schedule for conducting audits in the comments section.</p>		<p>sampling methodology to distribute questionnaires. ICE Annually, Office of Diversity and Civil Rights contracts with 1-4 field offices to conduct an Organizational Climate Assessment (OCA), which includes a review of EEO program deficiencies.</p> <p>TSA BA Working Group will be standing up during 1st Quarter and will meet bi-monthly through the fiscal year.</p> <p>USCG Annual Command Checklist</p> <p>USCIS A program assessment is distributed to program offices and directorates in October/November every year.</p> <p>USSS Every four years, the Office of Professional Responsibility assesses agency field and resident offices, resident offices, resident agencies, domiciles as well as headquarters offices. EEO Initiatives are included as part of this assessment.</p>	
<p>C.1.b</p>	<p>Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.</p>	<p>No-USCIS,HQ</p>	<p>CBP Annual audits conducted via Self-Inspection Program. Corrections must be provided as follow up items. ICE The Office of Diversity and Civil Rights notifies field offices of any EEO and/or</p>	<p align="center">New</p>

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			workforce related barriers resulting from the climate assessment. TSA BA Working Group will be standing up during 1st Quarter and will meet bi-monthly through the fiscal year. USCG Annual Command Checklist USSS field offices are part of a larger directorate and are included as part of that directorate in the MD 715 Report.	
C.1.c	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	N/A USCIS, HQ	USCIS No field audits have been conducted.	New
 Compliance Indicator  Measures	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (Yes/No/NA)	Comments New Indicator	
C.2.a	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	No-ICE	ICE C.2.a and C.2.a.1 are combined to form H-4, all planned activities toward completion of the objectives are represented in H-4.	New
C.2.a.1	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	No-ICE		New
C.2.a.2	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	Yes	CBP The EEO office has a harassment liaison/coordinator who refers all harassment allegations received through the EEO process. Individuals can report harassment allegations	New

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			through their chain of command, CBP's Office of Professional Responsibility, or the Joint Intake Center. However, compliance activities related to harassment complaints made through the EEO process are managed by the EEO office (and referred to CBP's Office of Professional Responsibility).	
C.2.a.3	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	No-ICE	ICE Currently working with Office of Professional Responsibility/Joint Intake Center to address allegations of harassment.	New
C.2.a.4	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [see Enforcement Guidance, V.C.]	No-ICE, USCIS N/A TSA, USSS	ICE C.2.a.4 and C.2.a.5 are combined to form H-6, all planned activities toward completion of the objectives are represented in H-6. TSA Per TSA MD 1100.73-3 Anti-Harassment Program Handbook Rev. 8/26/17 Section E.1.b CRD is not required to report to the Anti-Harassment Office. USSS Office of Professional Responsibility reports anti-harassment complaints to the EEO Office for tracking purposes.	New
C.2.a.5	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <u>Complainant v. Dep't of Veterans Affairs</u> , EEOC Appeal No. 0120123232 (May 21, 2015); <u>Complainant v. Dep't of Defense (Defense Commissary Agency)</u> , EEOC Appeal No.	No- CBP, ICE, HQ	CBP Pending further review of CBP's harassment allegations is required to ascertain if a prompt inquiry is conducted in harassment allegations received	New

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	0120130331 (May 29, 2015)] If “no”, please provide the percentage of timely-processed inquiries in the comments column.		outside of the EEO complaint process. ICE C.2.a.4 and C.2.a.5 are combined to form H-6, all planned activities toward completion of the objectives are represented in H-6. HQ Percentage completed timely is 0%.	
C.2.a.6	Do the agency’s training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR 1614.203(d)(2)]	No-ICE		New
C.2.b	Has the agency established disability reasonable accommodation procedures that comply with EEOC’s regulations and guidance? [see 29 CFR 1614.203(d)(3)]	No-FLETC		New
C.2.b.1	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]	Yes		E.1.d
C.2.b.2	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	No— FLETC		New
C.2.b.3	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]	Yes		New
C.2.b.4	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]	Yes		New
C.2.b.5	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests in the comments column.	No—CBP, FLETC, ICE, TSA, USSS	CBP reported 14% of reasonable accommodation requests received in FY 2018 have been processed in the time frame set forth in CBP’s reasonable accommodation procedures (15 business days). FLETC – 92.5%.	E.1.e

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			<p>ICE reported that in FY 2018, 20% of reasonable accommodation (RA) requests were processed within 15 business days, which fell short of ICE’s goal of processing 90% of RA requests within the time frame set forth in the agency standard operating procedures for reasonable accommodations.</p> <p>TSA reported that at the end of FY18, the RA Office had processed or had in process a total of 427 cases. Of that total, 368 cases were closed. 264, or 72%, of the closed cases were processed within a 60-day period of time in accordance with the timeline established in the Management Directive – Reasonable Accommodation Handbook. 104 or 28% of the cases exceeded the 60 –day timeline. 59 cases are carrying over into FY 2019.</p> <p>USSS In FY 2018, for employees, 89.5% of requests were processed timely with an average processing time of 10 days. For applicants, 83.3% of requests were processed timely, with an average processing time of 21 days. Agency timeframes are for no more than 20 days.</p>	
C.2.c	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC’s regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	No-ICE	ICE C.2.c and C.2.c.1 are combined to form H-9, all planned activities toward	New

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			completion of the objectives are represented in H-9.	
C.2.c.1	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comments column.	No-ICE, USCIS, HQ	<p>DHS https://www.dhs.gov/reasonable-accommodations-dhs</p> <p>CBP Personal Assistance Services requests are processed in the same manner as all other reasonable accommodation requests. CBP references https://www.cbp.gov/about/eo-diversity/reasonable-accommodation</p> <p>ICE C.2.c and C.2.c.1 are combined to form H-9, all planned activities toward completion of the objectives are represented in H-9.</p> <p>USCG https://www.uscg.mil/Family/Civil-Rights/fag/</p> <p>TSA https://www.tsa.gov/about/jobs-at-tsa</p> <p>USSS The new policy is posted on the agency’s website. https://www.secretservice.gov/join/diversity/</p>	New
 Compliance Indicator  Measures	C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	Measure Met? (Yes/No/NA)	Comments New Indicator	

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

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C.3.d	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	No-CBP N/A-ICE, TSA, USCIS, USSS	ICE ODCR does not recommend, rather it works with the Office of Human Capital and Office of Professional Responsibility for disciplinary actions. TSA The program office with guidance from TSA's Professional Responsibility and/or Chief Counsel offices has the final decision. USCIS No recommendations have been made therefore the agency head has not had an opportunity to implement remedial action. USSS All disciplinary actions are covered under ITG-04.	New
 Compliance Indicator  Measures	C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.	Measure Met? (Yes/No/NA)	Comments	
C.4.a	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	No-CBP, USCIS	CBP EEO Director reports to the Executive Director, PDO. The Executive Director, PDO, is part of the Senior Management Council.	New
C.4.b	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	No-HQ		C.2.a, C.2.b, & C.2.c
C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs,	No-USCIS		New

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	etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]			
C.4.d	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	Yes		New
C.4.e	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:			
C.4.e.1	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	No-HQ		New
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	No-HQ		New
C.4.e.3	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Yes		New
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	No-HQ		New
C.4.e.5	Assist in preparing the MD-715 report? [see MD-715, II(C)]	Yes		New
 Compliance Indicator  Measures	C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.	Measure Met? (Yes/No/NA)	Comments	
C.5.a	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)]	Yes		C.3.a.
C.5.b	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Yes	CBP in FY 2018 one manager received a letter of reprimand. FLETC No findings of discrimination this period. ICE 2 Total Findings (FY 17: 2 and FY 18: 1) In FY 17, one supervisor received a letter of reprimand. The other supervisor retired before disciplinary actions occurred. The FY 18 finding is pending review for disciplinary	C.3.c

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			<p>action by management and Employee Relations.</p> <p>USCG There were no findings of discrimination in FY16, FY17, or FY18.</p> <p>TSA In FY18, TSA issued the following: (2 Actions from Headquarters, 2 Actions from Federal Air Marshals, 101 Actions from Security Operations and 1 Finding of Discrimination)</p> <ul style="list-style-type: none"> - 39 Letters of Counseling - 54 Letters of Reprimand - 5 Adverse Actions (suspension of more than 14 days, including indefinite suspensions and removals) - 6 terminations - 1 Other (Last Chance Agreements) - 1 Finding of Discrimination <p>Total of 106 EEO Violations</p> <p>USCIS In FY18 there were two.</p> <p>USSS reported there were no findings this reporting period.</p>	
C.5.c	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [see MD-715, II(C)]	Yes		New
 Compliance Indicator  Measures	C.6 – The EEO office advises managers/supervisors on EEO matters.	Measure Met? (Yes/No/NA)	Comments	

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C.6.a	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments column.	No-HQ	<p>ICE Annually during Managers and Supervisors training.</p> <p>USCG Annually</p> <p>TSA Quarterly reports are provided to the Security Operations office on complaint data.</p> <p>USCIS Annual State of EEO briefing to executives; demographic snapshots are available by request; EEO Director and Deputy Director conduct meet and greets with program offices and directorates on an ad hoc basis and when new Assistant Directors onboard. Many supervisors and senior leaders in the field also participate in monthly SEPM Summit meetings.</p> <p>USSS Annually.</p>	C.1.a
C.6.b	Are EEO officials readily available to answer managers’ and supervisors’ questions or concerns? [see MD-715 Instructions, Sec. I]	Yes		New
<p>Essential Element D: PROACTIVE PREVENTION</p> <p>This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.</p>				
 Compliance Indicator  Measures	D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.	Measure Met? (Yes/No/NA)	Comments	
D.1.a	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	Yes		New

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D.1.b	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I]	No-HQ		New
D.1.c	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]	No-CBP, ICE, TSA	CBP The agency utilizes a DHS exit interview tool and does not independently administer exit surveys or control questions contained therein. ICE D.1.c and E.4.b are combined to form H-10, all planned activities toward completion of the objectives are represented in H-10.	New
 Compliance Indicator  Measures	D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Measure Met? (Yes/No/NA)	Comments New Indicator	
D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	Yes		New
D.2.b	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	No-HQ		B.2.c.2
D.2.c	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	No-HQ		B.2.c.1
D.2.d	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable	No-HQ	CBP Complaint data, exit surveys, program evaluations, and special emphasis programs.	New

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	<p>accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] If “yes”, please identify the data sources in the comments column.</p>		<p>FLETC Complaint Data, DHS Exit Surveys, Federal Employee Viewpoint Survey, Reasonable Accommodation Data, D&I Program after action reports.</p> <p>ICE ODCR reviews the following: complaint/grievance data; employee climate surveys; focus groups; and evaluative data from the special emphasis programs.</p> <p>USCG The CG Barrier Analysis Working Group reviews the following on an annual basis: Complaints/grievance Exit Surveys Employee Climate Surveys Focus Groups Affinity Groups Union Program Evaluation Anti-Harassment Program Special Emphasis Programs Reasonable Accommodation Program External Special Interest Groups</p> <p>TSA The data sources are: complaint/grievance data, employee climate survey, reasonable accommodation program, workforce demographics, and the Barrier Analysis Recommendation report.</p> <p>USCIS EEO complaint data, exit surveys, FEVS, USCIS climate survey, special emphasis programs, reasonable</p>	
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			accommodation program, and annual program assessment of program offices and directorates. USSS Complaints data, exit survey data, and reasonable accommodation data.	
 Compliance Indicator  Measures	D.3 – The agency establishes appropriate action plans to remove identified barriers.	Measure Met? (Yes/No/NA)	Comments New Indicator	
D.3.a.	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	No-HQ		New
D.3.b	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	No-HQ		New
D.3.c	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	No-HQ		New
 Compliance Indicator  Measures	D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.	Measure Met? (Yes/No/NA)	Comments New Indicator	
D.4.a	Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d)(4)] Please provide the internet address in the comments.	No-TSA, HQ	DHS https://www.dhs.gov/reports-office-civil-rights-and-civil-liberties CBP references See: https://www.cbp.gov/about/eo-diversity/diversity-inclusion FLETC	New

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			https://www.fletc.gov/affirmative-action-plan-2017-pdf ICE ODCR will post the FY 17 MD-715 Report's Affirmative Action Plan on its intranet/internet website once the plan is generated. USCIS https://www.uscis.gov/about-us/affirmative-action-plan-recruitment-hiring-advancement-and-retention-persons-disabilities USSS Affirmative Action Plan is posted on the agency's public website https://www.secretservice.gov/join/diversity/	
D.4.b	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]	Yes		New
D.4.c	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]	Yes		New
D.4.d	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)]	Yes		New
Essential Element E: EFFICIENCY				
This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency's EEO programs and an efficient and fair dispute resolution process.				
 Compliance Indicator	E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.	Measure Met? (Yes/No/NA)	Comments	
				

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Measures				
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Yes		E.3.a.1
E.1.b	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Yes		E.3.a.2
E.1.c	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(l)?	Yes		New
E.1.d	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(l)? If so, please provide the average processing time in the comments.	No-HQ	<p>HQ Average processing time is 76 days.</p> <p>FLETC Issuance occurs in fewer than 25 days.</p> <p>ICE During FY 2017, the average processing time was 50 days</p> <p>TSA reported in FY 2018, the average number of days to issuance of acceptance letters was 43 days. The Department of Homeland Security is responsible for issuing final agency decisions dismissing complaints.</p> <p>USCIS reported the average number of processing days is 63.</p> <p>USSS reported the average processing time is 42.36 days.</p>	New
E.1.e	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	Yes		New
E.1.f	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	No-FLETC, ICE	FLETC Two of five cases were untimely.	E.3.a.3

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			ICE The Agency works diligently to produce timely and complete investigations, however, ODCR lacks sufficient resources to meet all regulatory timeframes.	
E.1.g	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	Yes		New
E.1.h	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	No-Department	Final agency decisions (FADs) are issued by DHS CRCL for all DHS Components.	E.3.a.4
E.1.i	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?	Yes	Final actions are issued by DHS CRCL for all DHS Components.	E.3.a.7
E.1.j	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comments column.	Yes	<p>CBP did not use contractors during FY 2018.</p> <p>ICE In accordance with the contractor's statement of work, the Agency may demand the removal of a contract investigator where it determines an investigator is ineffective (including untimeliness) or biased.</p> <p>USCG The Performance Work Statement provides specific delivery accountability.</p> <p>TSA Currently, TSA has agreements with two outside contractors for conducting Investigations. The contracts have a penalty clause for poor work or delays.</p>	E.2.c

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			<p>USCIS Per our statement of work, we review ROIs prior to issuance for sufficiency and thoroughness and request corrections where they do not meet our standards.</p> <p>USSS Works directly with Procurement Division to remove contractors who do not comply with performance statement of work.</p>	
E.1.k	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes		New
E.1.l	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes		New
 Compliance Indicator  Measures	E.2 – The agency has a neutral EEO process.	Measure Met? (Yes/No/NA)	Comments Revised Indicator	
E.2.a	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)]	Yes		New
E.2.b	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If “yes”, please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.	Yes	<p>CBP Acceptance/dismissal decisions and final agency decisions are reviewed and issued by DHS CRCL.</p> <p>FLETC The EEO Officer and the Complaints Manager are licensed.</p> <p>ICE ODCR has two embedded OPLA attorneys that review reports of investigation. They</p>	E.6.a

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			<p>only provide sound legal advice to various divisions within ODCR and do not represent the Agency in any other manner.</p> <p>USCG Legal Command</p> <p>TSA reported the Chief Counsel's Labor and Employment Advice Section offers feedback on the legal sufficiency of investigation reports. This section is separate from the agency's Litigation Section (defensive function). Additionally, all final determinations of legal sufficiency are made by the EEO Office.</p> <p>USCIS The EEO Specialist that does the sufficiency review is an attorney, and the Complaints Manager that oversees all sufficiency reviews is also an attorney.</p> <p>USSS Office of Chief Counsel. This attorney is separate from attorneys who are considered the defensive arm of the agency.</p> <p>Department/CRCL: Two dedicated attorneys, who have no role in the agency's defensive function, are embedded.</p>	
E.2.c	If the EEO office relies on the agency's defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]	Yes		New

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E.2.d	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	Yes		E.6.b
E.2.e	If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)]	Yes		E.6.c
 Compliance Indicator  Measures	E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Measure Met? (Yes/No/NA)	Comments	
E.3.a	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	Yes		E.4.a
E.3.b	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Yes		E.4.c
E.3.c	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	Yes		D.2.a
E.3.d	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes		New
E.3.e	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	No-HQ		E.4.d
E.3.f	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Yes		New
 Compliance Indicator  Measures	E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Measure Met? (Yes/No/NA)	Comments	
E.4.a	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:			
E.4.a.1	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	Yes		E.5.a

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E.4.a.2	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	Yes		E.5.c
E.4.a.3	Recruitment activities? [see MD-715, II(E)]	Yes		E.5.f
E.4.a.4	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	No-TSA, USCIS		New
E.4.a.5	The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]	Yes		New
E.4.a.6	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	Yes		New
E.4.b	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	No-ICE	ICE D.1.c and E.4.b are combined to form H-10, all planned activities toward completion of the objectives are represented in H-10.	New
 Compliance Indicator  Measures	E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.	Measure Met? (Yes/No/NA)	Comments	
E.5.a	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	ICE reviews its workforce data annually. USCG -462 Report -MD-715 Report TSA reported that they Internally collect program data and it is reviewed on a weekly basis by the EEO Director. It includes complaint, ADR and training/outreach data. USCIS In FY 2017-2018, USCIS conducted a trend analysis of underrepresentation in the higher grades from FY 2012 to FY 2016.	E.5.e

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			USSS Continuously monitors EEO complaint processing program and Disability Reasonable Accommodation Program.	
E.5.b	Does the agency review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If "yes", provide an example in the comments.	Yes	<p>ICE reviewed best practices across agencies prior to implementing its Field-Special Emphasis Program.</p> <p>USCG Special Emphasis Program with DHS and other components.</p> <p>TSA reported the EEO Director or a designated representative meets with other DHS EEO directors on a monthly basis to discuss best practices.</p> <p>USCIS has reviewed other agencies' resurveying practices, reasonable accommodation practices, means and methods of analysis, and Diversity Council presence at the agency level.</p> <p>USSS for example, DHS hosts quarterly Disability Employment Advisory Council meetings where Agency/Components share practices regarding the Disability Program.</p>	E.5.g
E.5.c	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Yes	.	E.3.a
Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE				
This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.				

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 Compliance Indicator  Measures	F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.	Measure Met? (Yes/No/NA)	Comments	
F.1.a	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	Yes	.	F.1.a
F.1.b	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	Yes		E.3.a.6
F.1.c	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes		F.2.a.1
F.1.d	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes		F.2.a.2
F.1.e	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	Yes		F.3.a.
 Compliance Indicator  Measures	F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Measure Met? (Yes/No/NA)	Comments Indicator moved from E-III Revised	
F.2.a	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	Yes	.	C.3.d
F.2.a.1	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]	Yes	.	E.3.a.5
F.2.a.2	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	Yes	.	E.3.a.7
F.2.a.3	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC’s Office of Federal Operations? [see 29 CFR §1614.403(e)]	Yes	.	New
F.2.a.4	Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes	.	F.3.d (1 to 9)

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 Compliance Indicator  Measures	F.3 - The agency reports to EEOC its program efforts and accomplishments.	Measure Met? (Yes/No/NA)	Comments	
F.3.a	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	Yes		New
F.3.b	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	No-HQ		New

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

Part H.1 was closed out in a prior year. The H.1 listed below is new starting in the FY 2018 reporting cycle, which requires all Part G unmet measures to be represented in a Part H. Parts H.2 and H.3 were closed out in prior years.

Part H.1

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

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

Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency																																																
	See Part G for list of specific DHS Components. See Component Part H's for specific objectives, responsible officials, planned activities, and accomplishments related to each DHS Component deficiency.																																																
	<table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Measure</th> <th style="text-align: left;">Number of DHS Components with Deficiency</th> </tr> </thead> <tbody> <tr><td>A.1.a</td><td>3</td></tr> <tr><td>A.2.b.3</td><td>1</td></tr> <tr><td>B.1.a</td><td>3</td></tr> <tr><td>B.1.a.1</td><td>2</td></tr> <tr><td>B.1.c</td><td>2</td></tr> <tr><td>B.1.d</td><td>1</td></tr> <tr><td>B.3.b</td><td>1</td></tr> <tr><td>B.4.a.01</td><td>1</td></tr> <tr><td>B.4.a.02</td><td>1</td></tr> <tr><td>B.4.a.03</td><td>3</td></tr> <tr><td>B.4.a.05</td><td>2</td></tr> <tr><td>B.4.a.09</td><td>1</td></tr> <tr><td>B.4.a.11</td><td>1</td></tr> <tr><td>B.4.b</td><td>2</td></tr> <tr><td>B.6.a</td><td>2</td></tr> <tr><td>B.6.b</td><td>2</td></tr> <tr><td>B.6.c</td><td>2</td></tr> <tr><td>B.6.d</td><td>1</td></tr> <tr><td>C.1.a</td><td>1</td></tr> <tr><td>C.1.b</td><td>2</td></tr> <tr><td>C.2.a</td><td>1</td></tr> <tr><td>C.2.a.1</td><td>1</td></tr> <tr><td>C.2.a.3</td><td>1</td></tr> </tbody> </table>	Measure	Number of DHS Components with Deficiency	A.1.a	3	A.2.b.3	1	B.1.a	3	B.1.a.1	2	B.1.c	2	B.1.d	1	B.3.b	1	B.4.a.01	1	B.4.a.02	1	B.4.a.03	3	B.4.a.05	2	B.4.a.09	1	B.4.a.11	1	B.4.b	2	B.6.a	2	B.6.b	2	B.6.c	2	B.6.d	1	C.1.a	1	C.1.b	2	C.2.a	1	C.2.a.1	1	C.2.a.3	1
Measure	Number of DHS Components with Deficiency																																																
A.1.a	3																																																
A.2.b.3	1																																																
B.1.a	3																																																
B.1.a.1	2																																																
B.1.c	2																																																
B.1.d	1																																																
B.3.b	1																																																
B.4.a.01	1																																																
B.4.a.02	1																																																
B.4.a.03	3																																																
B.4.a.05	2																																																
B.4.a.09	1																																																
B.4.a.11	1																																																
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C.1.b	2																																																
C.2.a	1																																																
C.2.a.1	1																																																
C.2.a.3	1																																																
DHS Component EEO program deficiencies																																																	

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Type of Program Deficiency	Brief Description of Program Deficiency
	C.2.a.4 2
	C.2.a.5 3
	C.2.a.6 1
	C.2.b 1
	C.2.b.2 1
	C.2.b.5 5
	C.2.c 1
	C.2.c.1 3
	C.3.c 1
	C.3.d 1
	C.4.a 2
	C.4.b 1
	C.4.c 1
	C.4.e.1 1
	C.4.e.2 1
	C.4.e.4 1
	C.6.a 1
	D.1.b 1
	D.1.c 2
	D.2.b 1
	D.2.c 1
	D.2.d 1
	D.3.a 1
	D.3.b 1
	D.3.c 1
	D.4.a 2
	E.1.d 1
	E.1.f 2
	E.1.h 1
	E.3.e 1
	E.4.a.4 2
	F.3.b 1

Objective(s) and Dates for EEO Plan

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

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

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

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2018	<p>Issued data call to all Components for mid-year update on all Part G measures; tabulated results; presented results to all Components at CRCL/DMS Component Quarterly Meeting; facilitated discussion of how to address common unmet measures.</p> <p>Conducted one-on-one meetings with Components to review program deficiencies, actions, accomplishments, and plans.</p> <p>Issued data call to all Components for end-year Parts G and H, including progress made on deficiencies (Part H); Consolidate into Department Part G and compare to prior fiscal year Part G.</p>

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

MD-715 – Part H.2 Agency EEO Plan to Attain the Essential Elements of a Model EEO Program

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

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

Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element A: Demonstrated Commitment from Agency Leadership	A.1.a: During FY18, the Department did not issue the signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/01/2018	Release and post the Department-wide EEO Policy Statement to include all basis as identified by EEOC in its Instructions to Federal Agencies for MD-715 (dated September 2017).	09/06/19	New	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Officer, CRCL	Cameron Quinn	Yes

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Title	Name	Performance Standards Address the Plan? (Yes or No)
Deputy Officer, CRCL, Director EEO and Diversity	Veronica Venture	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
05/31/2019	Circulate draft EEO Policy Statement for review.	Yes		
09/06/2019	Post final signed and dated EEO Policy Statement with written commitment to release yearly.	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments
	None at this time.

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MD-715 – Part H.4 Agency EEO Plan to Attain the Essential Elements of a Model EEO Program

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

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

Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element E – Efficiency	<p>Specific deficiencies identified by at least one DHS Component:</p> <p>E.1.f Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?</p> <p>E.1.h When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?</p> <p>E.4.a.4 External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]</p>

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
3/30/2008	Expand and clarify the data collection process in order to allow DHS to perform accurate and comprehensive analyses in the future.	3/30/2019		

Responsible Official(s)

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

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Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
9/30/2019	1. Develop DHS-wide automated system to capture career development programs. (Table A/B12 - Participation in Career Development).	Yes	9/30/2020	
9/30/2013	2. Coordinate with DHS Components to develop supplemental internal controls regarding timeliness of investigations.	Yes		9/30/2013
9/30/2013	3. Coordinate with DHS Components to develop streamlined review processes to expedite issuance of Reports of Investigation.	Yes		9/30/2013
9/30/2017	4. Coordinate barrier analyses across Components through the EEO Director's Council, which implements the EEOD Strategic plan and activities.	Yes		9/30/2017
9/30/2016	5. Provide MD-715 Training to ensure compliance and to ensure the document serves as a useful resource for managers/supervisors.	Yes		9/30/2016
9/30/2018	6. Develop a brochure to promote the use of alternative resolutions to address workplace disputes and issues.	Yes	9/30/2019	
9/30/2019	7. Develop a multi-year plan to issue final agency decisions within 60 days in accordance with EEOC regulations.	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2018	Activities #2, #3, #4, and #5 completed in prior years. Activity #1

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	<p>In FY 2018, DHS reported participation and applicant flow counts and percentages for the SES Career Development Program, which is the only program managed at the Department level that leads to promotion without further competition. The SES Career Development Program, announced in USAJobs and USAStaffing, was used to track applications, qualifications, referrals, and selections. The Department was able to obtain full applicant flow data for the SES CDP announced in FY 2018. The SES CDP program staff were able to provide data on participants.</p> <p>DHS will identify qualifying career development programs at DHS and courses that support those programs. Using data from our talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes, DHS will produce a report in compliance with MD-715.</p> <p>DHS achieved full operational capability for its talent management system (referred to as the Performance and Learning Management System, or PALMS) at six of the nine DHS Components, in August 2017. OCHCO exempted FEMA, TSA, and USCG from adopting PALMS. DHS plans to identify, in FY 2019, the solution set for follow-on capability, including reporting capability, such as that required for MD-715.</p> <p>Activity #2, #3: Completed 9/30/2013 – Continues annually</p> <p>Activity#4: Completed 9/30/2017 – Barrier analysis continues</p> <p>Activity #5: Completed 9/30/2016</p> <p>Activity #6 The ADR brochure is scheduled to be completed in FY 2019.</p> <p>Activity #7</p> <ul style="list-style-type: none">• During FY 2018, CMAS issued or administratively closed 940 final agency actions, including 417 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. During FY 2018, CMAS issued or administratively closed 940 final agency actions, including 417 merit FADs. DHS had an internal performance measure goal to issue 40 percent of merit FADs by their regulatory due date. Further, CMAS amassed an inventory of pending merit FADs during the year. CMAS used a triage system for the sake of efficiency to address its inventory. 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 had a positive impact on the issuance of merit FADs
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	<p>in FY 2018. At the conclusion of FY 2018, CMAS was sufficiently staffed with analysts and support staff.</p>
<p style="text-align: center;">FY 2017</p>	<p>Updates below include FY 2017 and prior years.</p> <p>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).</p> <p>DHS timely submitted both the annual 462 Report and the annual No FEAR Act report.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>DHS achieved full operational capability for its talent management system (referred to as the Performance and Learning Management System, or PALMS) at six of the nine DHS Components, in August 2017. OCHCO exempted FEMA, TSA and USCG from adopting PALMS. 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.</p> <p>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 and reports. 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.</p> <p>CRCL led the development and establishment of a Management Directive on the EEO ADR Program, which was issued on December 12, 2016. DHS EEO Council and DHS leadership reviewed documents and every Component was briefed on the program. The ADR Directive ensures that</p>

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	<p>managers and supervisors participate in the mediation process and do so in good faith.</p> <p>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 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.</p> <p>CRCL conducted a DHS-wide study on women in law enforcement. The report on the study, 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 related to the Federal Women's Program, implementation has occurred via Special Emphasis Programs at the various Components, particularly during National Women's History Month. These programs highlight some of the challenges that women in law enforcement faced, and how women have managed the challenges.</p> <p>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.</p> <p>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.</p> <p>In addition, CRCL convened nearly 280 DHS EEO and Diversity professionals from across the country at the DHS Inaugural EEO and</p>
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	<p>Diversity Training Conference in Washington, D.C., 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>
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	<p>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.</p> <p>Component Updates Included by reference, per EEOC guidance.</p>
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Part I: Agency EEO Plan to Eliminate Identified Barrier

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

Part I.3

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

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

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

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
		<p>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.</p> <p>Statistical data on separation rates were reviewed and analyzed.</p>

EEO Group(s) Affected by Trigger

EEO Group
All Men
All Women
Hispanic or Latino Males
Hispanic or Latina Females – Yes, trending up
White Males
White Females – Yes, trending down
Black or African American Males – Yes, trending up
Black or African American Females – Yes, no trend
Asian Males
Asian Females

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EEO Group
Native Hawaiian or Other Pacific Islander Males – Yes, trending up
Native Hawaiian or Other Pacific Islander Females – Yes, no trend
American Indian or Alaska Native Males
American Indian or Alaska Native Females
Two or More Races Males
Two or More Races Females – Yes, trending down

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Tables AB 1 – 14
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	FEVS multiple years
Exit Interview Data	Yes	DHS exit survey FY 2014 - 2018 data
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	No	

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No	Yes

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Statement of Identified Barrier(s)

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

Objective(s) and Dates for EEO Plan

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

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Deputy Officer & Director of Equal Employment Opportunity and Diversity	Veronica Venture	Yes
Director, Diversity Management Section (DMS), CRCL	Elaine McKinney	Yes
OCHCO	Angela Bailey	Yes
DHS Components	Component EEO Directors (see Component reports for current EEO Directors)	Yes

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Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
3/31/2011	<p>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.)</p> <p>1.a. OCHCO will implement exit survey DHS-wide.</p>		3/31/2011
6/30/2011	1.b. OCHCO will conduct preliminary review of results and continue in future years.		9/30/2012
12/30/2011	1.c. OCHCO will conduct first major review of results and continue in future years.		9/30/2012
3/31/2012	1.d. OCHCO will update or augment methods as needed and continue in future years.		3/31/2012
6/30/2012	1.e. OCHCO and CRCL will identify retention interventions and continue in future years.		6/30/2012
12/30/2012	<p>1.f. OCHCO and CRCL will implement these interventions and continue in future years</p> <ul style="list-style-type: none"> • Track interventions through this plan quarterly • Evaluate as yearly data become available • Make any needed corrections • Conduct-in-depth analysis every second year 		12/30/2012
9/30/2013	<p>2. Use Employee Viewpoint survey to identify changes needed to improve employee satisfaction.</p> <p>2.a. CRCL will provide annual Federal Employee Viewpoint Survey (FEVS) results (and new yearly survey results as they become available) to DHS Components within two months of FEVS results publication annually.</p>		9/30/2013
9/30/2013	2.b. OCHCO, CRCL and Components will work jointly to develop plan for needed changes within four months of FEVS results publication annually.		9/30/2013

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Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
6/30/2011	3. Review promotion data. 3.a. CRCL will determine if there are areas or occupations with triggers in promotions annually.		6/30/2011
9/30/2011	3.b. CRCL will determine if these correlate with higher resignation rates annually.		9/30/2011
3/30/2013	3.c. If yes, CRCL will work with OCHCO to identify interventions <ul style="list-style-type: none"> • Track interventions through this plan • Evaluate as yearly data become available • Make any needed corrections 		3/30/2013
9/30/2013	4. Annually, DHS Components will promote participation in their career development programs, academic programs, and learning training programs sponsored by their agency and/or government agencies. In addition, as appropriate, Components will have access to training/career development programs courses through: <ul style="list-style-type: none"> • 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 		9/30/2013
9/30/2013	5. Annually, DHS will continue to promote/advertise DHS-wide the Senior Executive Service Candidate Development and Fellows Program.		9/30/2013
9/30/2013	6. Annually, DHS Components will use their agency's Mentoring Program, if applicable, as another career development tool.		9/30/2013
3/31/2011	7. Annually, DHS Components will conduct an assessment of occupations and grade levels where there is substantial underrepresentation to identify skills, knowledge, and abilities by		3/31/2011

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Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
	occupation; employees' training needs; and applicable career development programs.		

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2018	<p>Activity #1 In FY2018, DHS continued its use of the DHS-wide web-based Exit Survey. Aside from retirement, the top reasons separating non-SES employees listed for leaving DHS were:</p> <ul style="list-style-type: none"> • Personal or family related • Supervisor • Advancement opportunities <p>Results are based on completed exit surveys. USSS and TSA do not participate in the DHS-wide survey.</p> <p>Activity #2 The 2018 FEVS results were overall positive, with the Employee Engagement Index holding steady, and the Global Satisfaction and New IQ Indices increasing by one percentage point. DHS performed preliminary data analysis and shared the results with leadership and Components, along with the data analysis provided by the Office of Personnel Management (OPM). DHS worked intensively with the Employee Engagement Steering Committee (EESC) to develop Employee Engagement Action Plans targeting Component and sub-Component issues.</p> <p>As a result of the preliminary data analysis and information gathered through listening tours, DHS leadership over the course of FY 2019 will:</p> <ul style="list-style-type: none"> • Host an all-Executives forum, in conjunction with the Secretary's Awards Ceremony to convey information to SES personnel on themes related to FEVS such as ethics and inclusive diversity. • Work with the major operational Components on implementing the engagement elements of the President's Management Agenda, including identifying and working intensively with the lowest 20 percent performing organizations to increase their employee engagement and morale. • Continue EESC focus on the effective execution of engagement action plans. <p>Activity #3 Part E covers the FY 2018 trigger analysis and information on Activity #3 b and c actions.</p>

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	<p>Activity #4</p> <p>The Department continues to offer various ways for employees to further their education goals. In FY 2018, 31 employees participated in the Department of Defense Senior Service School master's degree programs. DHS also nominates employees to attend the Center for Homeland Defense and Security (CHDS) Masters and Executive Leaders Programs. DHS promotes the use of the OPM's Federal Academic Alliance programs where employees can take advantage of various discounts from more than 15 different colleges/universities.</p> <p>DHS employees have, or will have, access to training/career development courses by a variety of means:</p> <ul style="list-style-type: none">• DHS's Senior Executive Service Candidate Development Program (SES CDP), advertised both internally and externally to DHS;• DHS, in partnership with SkillSoft, offers nearly 40,000 online learning resources which can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are aligned to support competencies, job roles or blended learning offerings.• The DHS Leader Development Program, which establishes required and optional development activities throughout the year for new and seasoned leaders at all levels across DHS. <p>Activity #5</p> <p>Advertising for the SES CDP occurs via email, the DHS website, and other avenues of communication. DHS will continue its outreach efforts to help ensure a diverse applicant pool for this program. In addition, DHS is developing an SES Outreach Plan which will outline strategies to increase diversity in the SES cadre. In FY19 and beyond, DHS will also advertise for the SES CDP through its Employee Associations as well as the Strategic Recruitment, Diversity and Inclusion Council.</p> <p>Activity #6</p> <p>The DHS Mentoring Program is a formal program that provides enriching experiences through reciprocal relationships and opportunities for personal and professional growth while sharing knowledge, leveraging skills, and cultivating talent. The DHS Mentoring Program is open to all DHS federal employees. The Undersecretary for Management announces mentoring opportunities and training is provided to mentors. Types of mentoring include: Speed Mentoring, Flash Mentoring, Situational Mentoring, Reverse Mentoring, Group Mentoring, and Peer Mentoring. The program is evaluated and feedback is provided on its successes, along with areas requiring improvement. The Mentoring Connection contract has been extended through March 31, 2019. In FY18, the DHS Mentoring programs coordinated 272 mentoring/mentee partnerships.</p> <p>492 Mentors/Mentees Total</p> <ul style="list-style-type: none">• 272 Mentees• 220 Mentors <p>Gender Indicator (Mentors/Mentees)</p> <ul style="list-style-type: none">• Men = 54 percent
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	<ul style="list-style-type: none"> • Women = 46 percent <p>Ethnicity/Race Indicators</p> <ul style="list-style-type: none"> • White = 61 percent • Black or African American = 18 percent • Asian = 3 percent • Hispanic or Latino = 12 percent • Native Hawaiian or Other Pacific Islander = 0.4 percent • American Indian or Alaska Native = 0.4 percent • Two or More = 3 percent • Unspecified = 2 percent <p>The application period for the FY19 Mentoring Program commenced in October 2018, and closed on November 9, 2018.</p> <p>Activity #7 Participant/Selectee Highlights from the DHS SES CDP Cohort I - VII Analysis:</p> <ul style="list-style-type: none"> • For Black/African American participation, the trend is consistently fluctuating in every other year from Cohort I to Cohort VII; Asian American participation has similar results. • Representation of White Females dropped significantly from Cohort III (25.5 percent) to 8.2 percent in Cohort IV, then back to an upward trend for the remaining Cohorts, ending in 34.5 percent in Cohort VII. • Other ERI groups reflect nominal participation rates. • Note that DHS is developing a SES Diversity Plan to address issues of underrepresentation in the SES cadres. The plan will be released in FY19.
<p style="text-align: center;">FY 2017</p>	<p>Updates below include FY 2017 and prior years.</p> <p>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:</p> <ul style="list-style-type: none"> • Lack of advancement opportunities, • Problems with supervisor/management, and • Family related/personal reasons. <p>Results are based on completed exit surveys. USSS and TSA do not participate in the DHS-wide survey.</p> <p>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</p>

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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 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 SkillsSoft, 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 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.

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	<p>Activity #6 Completed in FY 2013. Components continue to use their agency mentoring programs, as appropriate.</p> <p>Activity #7 Department-Level Actions: 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.</p> <p>Example of Fiscal Year 2017 Applicant Flow Data Highlights</p> <p>Senior Executive Career Development Program (SES CDP) Cohort VI:</p> <ul style="list-style-type: none">• 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). <p>The DHS AFD analysis included a breakdown of each part of the selection process by race, ethnicity, and gender to identify potential barriers.</p> <p>Applicant Flow Data Analysis:</p> <p>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.</p> <p>Participant Applicant Flow Data (AFD) Analysis:</p> <ul style="list-style-type: none">• 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.
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	<p>In FY 2018, the DHS will:</p> <ul style="list-style-type: none">• 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).
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Part J: Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plans for persons with disabilities (PWD⁹) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and EEOC MD-715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

Section I: Efforts to Reach Regulatory Goals

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

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

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

Based on the utilization analysis of the DHS workforce by grade clusters, DHS has triggers for both clusters in the permanent workforce when compared to the 12 percent regulatory onboard goal.

In FY 2018, PWDs participated at a rate of 8.73 percent in the GS-1 to GS-10 grades, and a rate of 11.55 percent in the GS-11 to SES grade clusters.

While both rates are lower than expected, PWDs in the GS-11 to SES grade cluster, increased significantly, resulting in nearly 1.5 percent increase when compared to FY 17.

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

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

Based on the utilization analysis of the DHS workforce by grade clusters, DHS has triggers for both clusters in the permanent workforce when compared to the 2percent regulatory onboard goal.

In FY 2018, PWTDs participated at a rate of 1.29 percent in the GS-1 to GS-10 grades, and a rate of 1.27 percent in the GS-11 to SES grade clusters.

While both rates are lower than expected, there was a notable increased for PWTDs in the GS-11 to SES grade cluster, when compared to FY 17.

⁹ In this report, persons with disabilities (PWD) and individuals with disabilities (IWD) are used interchangeably. Persons with targeted disabilities (PWTD) and individuals with targeted disabilities (IWTD) are also used interchangeably. Individuals without disabilities (IWOD) are also referenced in this section.

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

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

DHS set a 12 percent hiring goal for Individuals with Disabilities at all grade levels; a 2 percent hiring goal for Individuals with Targeted Disabilities at all grade levels, excluding Law Enforcement and Transportation Security Officer occupations; and a 1.5 percent hiring goal for Schedule A hires, also excluding law enforcement and transportation security officer occupations.

In FY18, 10.4 percent of new hires were PWDs, and 1.7 percent were PWTDS in non-law enforcement related and non-TSO positions. While the Department did not meet the new hire goals listed above in these two areas, it should be noted that DHS ended FY18 with PWDs representing 10.45 percent of the total workforce and PWTDS representing 2.4 percent (*when excluding both Law Enforcement and Transportation Security Officer occupations*), both increases from FY17 (9.9 percent and 2.1 percent, respectively). In addition, Schedule A hires constituted 1.6 percent of all new hires in non-law enforcement related and non-TSO positions, exceeding the goal and increasing by 35 percent from FY17.

Section II: Model Disability Program

Pursuant to 29 C.F.R. §1614.203(d)(1), agencies must: ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities; administer the reasonable accommodation program and special emphasis 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 departmental level (OCHCO's Strategic Recruitment Diversity and Inclusion (SRDI)) has two assigned employees to support disability recruitment, career development, and retention programs across DHS.

All DHS Components have identified personnel for the following programs: Selective Placement Program, Disability Employment Program, Reasonable Accommodation Program, Operations Warfighter Program, and 508 Program.

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

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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	60	0	0	Cynthia Clinton-Brown, Executive Director, Office of Accessible Systems and Technology, Office of the Chief Information Officer. (effective November 2018) Each Component maintains responsibility for servicing their respective workforce. The total FTEs are included in the count.
Architectural Barriers Act Compliance	110	0	0	Karl Johnson, 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.

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

Yes X No

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

- Leading Quarterly Disability Employment Advisory Council meetings covering ongoing program guidance, updates, and sharing of best practices across DHS Components.
- Participation in the Federal Exchange on Employment & Disability (FEED), a Federal Interagency working group focused on information sharing, best practices, and collaborative partnerships designed to make the Federal Government a model employer of people with disabilities.

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

PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Yes No X

Upon review of each Component’s response to compliance indicator and associated measures outlined in the Agency Self-Assessment, under B.4: The agency has sufficient budget and staffing to support the success of its EEO program, two of the nine Components have identified deficiencies impacting successful implementation of the disability program during the reporting period. CRCL will continue to monitor and provide technical assistance as needed to remove the noted deficiencies.

In support of meeting this measure, CRCL continued efforts during FY 2018, to encourage all DHS Components to utilize the Accessibility Compliance Management System (ACMS) to manage and track reasonable accommodations. As of January 2018, six out of nine Components are successfully using ACMS. During FY 18, CRCL has been working in collaboration with OAST in the development of an enhanced ACMS reporting tool to include new reporting features consistent with EEOC’s reporting and record keeping requirements outlined in Section 501 of the Rehabilitation Act.

Section III: 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.

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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.

The Corporate Recruitment Council (CRC) conducts this activity and the Recruitment Outreach Marketing Matrix (ROMM) monitors it. The CRC, comprising recruiting personnel from DHS Components also assists in implementing the Strategic Outreach and Recruitment Plan (SOAR). In FY 2018, the CRC continued to maintain a Top 25 list of recruiting events to attend. From this list, OCHCO identified a priority subset for department-wide coordination focusing on DHS mission critical occupations (predominantly law enforcement).

Specifically, as it pertains to individuals with disabilities and targeted disabilities, Strategic Recruitment Diversity and Inclusion:

- Provided two employment information sessions about WRP, Pathways programs, how to apply through USAJOBS, and federal resume tips at Gallaudet University in March and September 2018.
- Attended National Geospatial-Intelligence Agency's (NGA) Persons with Disabilities Showcase and Recruitment Hiring Event to benchmark ideas for recruiting and hiring PWDs/PWTDs.
- Attended Gallaudet University's career fair in October 2018.
- Promoted the Top 5 recruiting events for PWD/PWTDs on a monthly basis to the CRC) to ensure component attendance. The events include colleges/universities, career fairs, and recruitment events.
- Collaborating with USSS to provide a WRP lunch and learn session in November 2018 for U.S. Secret Service hiring managers and recruiters to regarding the use of the WRP program for internships or permanent jobs.
- DHS maintains strategic partnerships with national disability advocacy groups and provides Components with recruitment resources for Individuals with Disabilities/Individuals with Targeted Disabilities. DHS attended recruiting events at Gallaudet University, California State Northridge, National Technical Institute for the Deaf and Bender Disability Virtual Career Fair.
- DHS attended over 290 recruiting events in over 25 states to attract candidates who identified as PWD/PWTD.

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Pursuant to 29 C.F.R. § 1614.203(a) (3), describe the agency’s use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce.

DHS uses the following hiring authorities to hire individuals with disabilities into temporary and permanent positions:

- 30 percent or More Disabled Veteran (5 U.S.C. § 3112; 5 C.F.R. § 316.302, 316.402, and 315.707)
- Schedule A Appointing Authority (5 C.F.R. § 213.3102(u))

To increase and promote the use of these hiring authorities, goals were established. In FY 2018, DHS hired 225 individuals with disabilities utilizing the Schedule A Hiring Authority, representing 1.6 percent of new hires excluding Law Enforcement and Transportation Security Officer occupations, exceeding the FY 2018 goal of 1.5 percent.

Using the 30 Percent or More Disabled Veterans hiring authority, DHS hired an additional 1,346 individuals using authorities that take disability into account, representing 5.2% of all new hires.

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

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

The Department recognizes that while it has an established policy on administering the employment of veterans, it does not currently have a policy covering the Schedule A Appointment Authority for Individuals with Disabilities. During FY 2018, DHS initiated benchmarking efforts with other Federal agencies and drafted standard operating procedures focusing on sound strategies and best practices on utilizing Schedule A for employment, retention, and career development opportunities.

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

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 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 further revise this training course by 2020.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

The CRC coordinated participation in recruiting events at Gallaudet University, California State Northridge, the National Technical Institute for the Deaf, the Bender Virtual Career Fair, as well as recruiting and outreach events for disabled veterans through Operation Warfighter and Wounded Warrior programs.

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

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goals of 12 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 <input checked="" type="checkbox"/> No |
| b. New Hires for Permanent Workforce (PWTD) | Yes <input checked="" type="checkbox"/> No |

During FY 2018, DHS nearly reached the 12 percent hiring goal for PWD with over 2,043 new hires, representing 11.03, a slight decrease from 12.04 percent of all new hires reported in FY 2017. DHS did not reach the 2 percent hiring goal for PWTD. PWTD represented 1.03 percent of all new hires, which falls below the 2 percent hiring goal. When excluding law enforcement and transportation security officer occupations, the percentage increases to 1.7 percent for PWTD.

Disability workforce data includes employees who self-identify as having a disability and employees appointed under Schedule A and 30 percent or more Disabled Veterans who do not otherwise identify as having a disability.

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 <input checked="" type="checkbox"/> | No |
| b. New Hires for MCO (PWTD) | Yes <input checked="" type="checkbox"/> | No |

Based on a review of B7 Applications and Hires which represents AFD and hires from all DHS Components, with the exception of FEMA, including only those who self-identify, triggers exist for the following occupations of the nine (9) priority mission-critical occupations for PWD and PWTD:

PWD:
 1802 - Compliance Inspection and Support: Qualified 4.41 percent; Selections 4.07 percent
 1895 - Customs and Border Protection: Qualified 1.62 percent; Selections 0.96 percent

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1896 - Border Patrol Agent: Qualified 2.04 percent; Selections 0.61 percent

PWTD:

1802 - Compliance Inspection and Support: Qualified 2.22 percent; Selections 0.49 percent

1895 - Customs and Border Protection: Qualified 0.81 percent; Selections 0.00 percent

1896 - Border Patrol Agent: Qualified 0.94 percent; Selections 0.20 percent

1811 - Criminal Investigator: Qualified 0.86 percent; Selections 0.00 percent

2210 - Information Technology Management: Qualified 2.32 percent; Selections 1.26 percent

All of the above mission-critical occupations listed above, with the exception of 2210, have physical and or medical requirements that cause lower than expected selection rates for both PWD and PWTD.

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. Based on this, we are not attempting to tabulate relevant applicant pools for this reporting cycle.

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

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 from all DHS Components, with the exception of FEMA, triggers exist for the following occupations for PWD and PWTDs when comparing the qualified applicant pool to the number of selections for promotions:

PWD

1802- Compliance Inspection and Support: Qualified 7.80 percent; Selections 4.36 percent

PWTD

1802 - Compliance Inspection and Support: Qualified 4.45 percent; Selections 0.63 percent

2210 - Information Technology Management: Qualified 3.74 percent; Selections 2.89 percent

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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. In FY 2019, DHS will explore the feasibility of creating a mentoring program focused on individuals with disabilities. Until then, coordinated efforts will be implemented to encourage employees with disabilities to participate in existing DHS advancement programs.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

The Department continues to offer various ways for employees to further their education goals. In FY 2018, 31 employees participated in the Department of Defense Senior Service School master's degree programs. DHS also nominates employees to attend the Center for Homeland Defense and Security (CHDS) Masters and Executive Leaders Programs. DHS promotes the use of the OPM's Federal Academic Alliance programs where employees can take advantage of various discounts from more than 15 different colleges/universities.

DHS employees have, or will have, access to training/career development courses by a variety of means:

- DHS's Senior Executive Service Candidate Development Program (SES CDP), advertised both internally and externally to DHS;
- DHS, in partnership with SkillSoft, offers nearly 40,000 online learning resources which can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are aligned to support competencies, job roles or blended learning offerings.
- The DHS Leader Development Program, which establishes required and optional development activities throughout the year for new and seasoned leaders at all levels across DHS. DHS continues to use the Pathways Program, the Federal Government's primary entrance point for students and recent graduates. In FY 2018, DHS hired 346 Pathways student interns, 71 recent graduates, and 11 Presidential Management Fellows, totaling 428 Pathways Program participants. Of these, 26.7 percent identified as PWD and 1.40 percent were PWTD.

The DHS Mentoring Program is a formal program that provides enriching experiences through reciprocal relationships and opportunities for personal and professional growth while sharing knowledge, leveraging skills, and cultivating talent. The DHS Mentoring Program is open to all DHS federal employees. The Mentoring Announcement is sent out by DHS Management to all DHS employees and training is provided to mentors. Types

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of mentoring include: Speed Mentoring, Flash Mentoring, Situational Mentoring, Reverse Mentoring, Group Mentoring, and Peer Mentoring. The program is evaluated and feedback is provided on its successes and areas of improvement. The Mentoring Connection contract which coordinates the program has been extended until March 31, 2019. In FY 2018, the DHS Mentoring programs coordinated 272 mentoring/mentee partnerships.

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)		346		15.0%		1.15%
Fellowship Programs (Pathways Recent Graduates)		71		26.7%		1.40%
Presidential Management Fellows		11		63.6%		0.0%
Mentoring Programs		266		10.5%		2.2%
Coaching Programs						
Training Programs						
Detail Programs						
Other Career Development Programs DHS SES CDP	592	31 selectees; however, 29 selectees participate in the program.	3.21%	0%	1.52%	0%

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

a. Applicants (PWD)	Yes	No	N/A 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 2018, AFD data were not available to conduct an analysis of the applicants and selections for development programs identified above by the required benchmarks. However, when comparing the number of selections for PWD to the 12 percent goal, PWD were selected at rates significantly above those expected in the reported, with the exception of the DHS Headquarters Mentoring Program and the SES Candidate Development Program (CDP).

DHS will continue to include encouraging language in all career development programs to increase the participation of PWDs.

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

a. Applicants (PWTD)	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 2018, AFD data were not available to conduct an analysis of the applicants and selections for development programs identified above by the required benchmarks. When comparing the number of selections for PWTD to the 2 percent goal, PWTDs are not participating at rates expected in the programs outlined above, with the exception of the DHS Headquarters Mentoring program, where they exceeded the 2% goal.

C. AWARDS

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

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

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

PWD	Benchmark
Cash awards 1 – \$500: PWD Inclusion Rate: 18.73%	IWOD Inclusion Rate: 21.88%
Cash awards \$500 +: PWD Inclusion Rate: 52.76%	IWOD Inclusion Rate: 62.50%
PWTD	Benchmark
Cash awards \$500 +: Inclusion Rate: 48.88%	IWOD Inclusion Rate: 62.50%

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 <input checked="" type="checkbox"/> |
| b. Pay Increases (PWTD) | Yes | No <input checked="" type="checkbox"/> |

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

QSI Awards	PWD Inclusion Rate:	1.15%
	PWTD Inclusion Rate:	1.25%
Benchmark	IWOD Inclusion Rate:	0.80%

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 <input checked="" type="checkbox"/> |
| b. Other Types of Recognition (PWTD) | Yes | No | N/A <input checked="" type="checkbox"/> |

DHS did not have any other types of recognition programs during FY 2018.

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D. PROMOTIONS

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

a. SES

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

i. Qualified Internal Applicants (PWD)	Yes	X	No	
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ii. Internal Selections (PWD)	Yes	X	No	
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c. Grade GS-14

i. Qualified Internal Applicants (PWD)	Yes	X	No	
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ii. Internal Selections (PWD)	Yes	X	No	
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d. Grade GS-13

i. Qualified Internal Applicants (PWD)	Yes	X	No	
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ii. Internal Selections (PWD)	Yes	X	No	
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Based on a review of MD-715 Table B11: Internal Selections for Senior Level Positions (GS 13, 14, 15, and SES) - Distribution by Disability, PWD (PWD) participation rates are within the Qualified Internal Applicants and Selections indicate triggers.

DHS SES positions were all announced and open to the public during FY 2018. DHS is unable to determine the percentage of qualified internal applicants by disability distribution, due to limited applicant flow data available. However, when comparing the percentage of SES selections to the relevant applicant pool as an alternative comparator, selections for PWD (PWD) were lower than expected.

PWD SES Selections:	9.59%	PWD Relevant Applicant Pool:	13.00%
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2. Does your agency have a trigger involving PWTD (PWTD) among the qualified *internal* applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

a. SES

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

b. Grade GS-15

i. Qualified Internal Applicants (PWTD)	Yes	No	X
ii. Internal Selections (PWTD)	Yes	X	No

c. Grade GS-14

i. Qualified Internal Applicants (PWTD)	Yes	No	X
ii. Internal Selections (PWTD)	Yes	No	X

d. Grade GS-13

i. Qualified Internal Applicants (PWTD)	Yes	No	X
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 participation rates within the Qualified Internal Applicants indicate no triggers for Grades GS-13 through GS-15. However, data revealed a trigger for Internal Selections of PWTD for GS-15.

DHS SES positions were all announced and open to the public during FY 2018. DHS is unable to determine, due to limited applicant flow data available, the percentage of qualified internal applicants by disability distribution. However, when comparing the percentage of SES selections to the relevant applicant pool as an alternative comparator, selections for PWTD were lower than expected.

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

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

- | | | |
|------------------------------|---|--|
| a. New Hires to SES (PWTD) | Yes | No <input checked="" type="checkbox"/> |
| b. New Hires to GS-15 (PWTD) | Yes | No <input checked="" type="checkbox"/> |
| c. New Hires to GS-14 (PWTD) | Yes <input checked="" type="checkbox"/> | No |
| d. New Hires to GS-13 (PWTD) | Yes | No <input checked="" type="checkbox"/> |

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

However, based on a review of MD-715 Table B8: New Hires by Type of Appointment, filtered down by hires for Senior Level Positions (GS 13, 14, 15, and SES) - Distribution by Disability, PWTD (PWTD) exceeded the 2 percent goal for all senior grades with the exception of GS-14.

	Hires	Qualified Applicant Pool	Regulatory Goal
New Hires to SES	2.44%	Not Available	2%
New Hires to GS-15	2.08%	Not Available	2%
New Hires to GS-14	1.96%	Not Available	2%
New Hires to GS-13	2.22%	Not Available	2%

The percentage of hires in Grades GS-13 and GS-14, increased when compared to FY 2017.

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

a. Executives

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

ii. Internal Selections (PWD)	Yes X	No
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b. Managers

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

ii. Internal Selections (PWD)	Yes	No X
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c. Supervisors

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

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

PWD Executive Selections:	8.92%	PWD Relevant Applicant Pool:	13.35%
PWD Manager Selections:	9.54%	PWD Relevant Applicant Pool:	9.37%
PWD Supervisor Selections:	4.37%	PWD Relevant Applicant Pool:	13.94%

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

a. Executives

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

b. Managers

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

c. Supervisors

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

Due to the limited availability of applicant flow data, DHS is unable to identify the participation rates by disability distribution for qualified internal applicants. When reviewing the internal selections and using the relevant applicant pool as an alternative comparator, triggers were identified for promotions to all supervisory positions.

PWTD Executive Selections:	0.70%	PWTD Relevant Applicant Pool:	1.47%
PWTD Manager Selections:	0.74%	PWTD Relevant Applicant Pool:	0.97%
PWTD Supervisor Selections:	0.14%	PWTD Relevant Applicant Pool:	1.74%

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7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions?

If “yes”, describe the trigger(s) in the text box.

a. New Hires for Executives (PWD)	Yes	No <input checked="" type="checkbox"/>
b. New Hires for Managers (PWD)	Yes	No <input checked="" type="checkbox"/>
c. New Hires for Supervisors (PWD)	Yes	No <input checked="" type="checkbox"/>

Due to the limited availability of applicant flow data, DHS is unable to identify the participation rates by disability distribution for qualified applicants. When reviewing the new hires and using the 12 percent goal as an alternative comparator, no triggers were identified for hires to supervisory positions for PWD (PWD).

PWD Executive Selections:	18.94%	PWD Regulatory Goal:	12.00%
PWD Manager Selections:	37.04%	PWD Regulatory Goal:	12.00%
PWD Supervisor Selections:	32.35%	PWD Regulatory Goal:	12.00%

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions?

If “yes”, describe the trigger(s) in the text box.

e. New Hires for Executives (PWTD)	Yes	No <input checked="" type="checkbox"/>
f. New Hires for Managers (PWTD)	Yes	No <input checked="" type="checkbox"/>
g. New Hires for Supervisors (PWTD)	Yes	No <input checked="" type="checkbox"/>

Due to the limited availability of applicant flow data, DHS is unable to identify the participation rates by disability distribution for qualified applicants. When reviewing the new hires and using the 2 percent goal as an alternative comparator, no triggers were identified for hires to supervisory positions for PWTD (PWTD).

PWTD Executive Selections:	2.27%	PWTD Regulatory Goal:	2.00%
PWTD Manager Selections:	2.22%	PWTD Regulatory Goal:	2.00%
PWTD Supervisor Selections:	5.88%	PWTD Regulatory Goal:	2.00%

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Section V: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Yes No

During FY 2018, DHS converted a total of 157 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 55.28 percent conversion rate. Of those converted, 138 were converted non-competitively after two years of satisfactory service, 15 converted to career or career conditional before 2 years of service, and 4 were converted by other means. Overall DHS experienced an increase in conversions when compared to FY 2017.

DHS will continue to educate supervisors and monitor progress on a quarterly basis.

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

a. Voluntary Separations (PWD) Yes No

b. Involuntary Separations (PWD) Yes No

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

Voluntary Separations	PWD (PWD) Inclusion Rate:	7.60%
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Benchmark	PWOD (IWOD) Inclusion Rate:	5.95%
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Involuntary Separations	PWD (PWD) Inclusion Rate:	0.89%
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Benchmark	PWOD (IWOD) Inclusion Rate:	0.66%
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3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.

- | | | |
|-----------------------------------|---|-----------------------------|
| a. Voluntary Separations (PWTD) | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| b. Involuntary Separations (PWTD) | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

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

Voluntary Separations	PWTD (PWTD) Inclusion Rate:	7.99%
Benchmark	PWTD (IWOD) Inclusion Rate:	5.95%
Involuntary Separations	PWTD (PWTD) Inclusion Rate:	1.41%
Benchmark	PWOD (IWOD) Inclusion Rate:	0.66%

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

Based on the DHS Department exit surveys completed during FY 2018, which includes all Components with the exception of TSA and USSS, approximately 18% percent of all employees voluntarily separating indicated their primary reason for leaving, resulting in 1,506 responses. Of those responses, 215 or 14.28% percent of the respondents, indicated they had a disability.

Of the respondents who indicated they had a disability, the top three reasons for leaving other than Retirement, Moving to Another DHS Component, or Other included:

- Supervision/Management – 11.63%
- Advancement Opportunities – 11.63%
- Personal/Family Related – 8.84%

The top reasons mentioned above are the same as PWOD.

When comparing leaving based on health-related reasons, PWD indicated health-related reasons as the primary reason 5.58% of the time compared to 1.82% for individuals without disabilities.

Further review revealed a 4.18% response rate for employees indicating they had a targeted disability.

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

- Advancement Opportunities – 11.11%
- Supervision/Management – 11.11%
- Geographic Location and Salary Pay (tied) – 9.52%

Health related reasons were indicated by 6.35% of the PWTD respondents.

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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>

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

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

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

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

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

In FY 2018, CRCL collaborated with OAST and DHS Components to implement standardized language to meet the requirements for posting notices on the internal and external websites that define the rights of individuals with disabilities under Section 508 and the ABA. In addition CRCL stood-up a working group comprising representatives from CRCL Compliance, CRCL Anti-Discrimination Group, OAST, and Components to draft standard operating procedures for processing 508 complaints. DHS anticipates completing and implementing the new procedures by the end of the second quarter in FY 2019.

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C. REASONABLE ACCOMMODATION PROGRAM

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

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

During FY 2018, the overall average time frame for processing initial requests for reasonable accommodations was approximately 39 days.

The average number of days reported by DHS Components for FY 2018 are as follows:

CBP: 108 Days

USCIS: 19 Days

HQ: 44 Days

FEMA: 15 Days

ICE: 68 Days

TSA: 29 Days

USCG: 16 Days

USSS: 10 Days

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

DHS is committed to providing effective reasonable accommodations to employees and applicants with disabilities. The overall average processing time for reasonable accommodation requests during FY 2018 was thirty nine (39) days.

All DHS Components provide reasonable accommodation training to managers and supervisors on a regular basis. Additionally, consistent with the new requirements outline in EEOC's Final Rule implementing revisions to Section 501 of the Rehabilitation Act of 1973, DHS and its Components have been working on revised reasonable accommodation and personal assistance service procedures. DHS and three of the nine Components (USCS, TSA, and USSS) submitted revised procedures to EEOC as required for review during FY 2018.

In support of DHS's reasonable accommodation program, CRCL has been collaborating with OAST on the development of an enhanced Accessibility Compliance Management System, to manage, track and report on all reasonable accommodation requests. DHS plans to deploy the new system by second quarter of FY 2019. The new system will have a built in reporting capability to produce all reporting requirements consistent with Section 501 and Executive Order 13164.

DHS developed the *Employment of People with Disabilities: Roadmap to Success* training in 2008, updated the

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materials in 2012, and more recently during FY 2017, to include the provision of the final rule implementing Section 501 of the Rehabilitation Act of 1973. All supervisors, hiring officials and human capital professionals are required to complete the training within sixty (60) days of appointment and every two years after appointment. All Components use the DHS training module. CRCL will develop a plan in FY 2019 to revise the training module by 2020.

In FY 2016, CRCL issued DHS Instruction Number 259-01-002, Procedures for Conducting a Department-Wide Search for a Reassignment as a Reasonable Accommodation of Last Resort. This Instruction outlines the procedures used to conduct a DHS-wide search for a position that will be used in a reassignment that is a reasonable accommodation of last resort. During FY 2017, to support the implementation of the Instruction, CRCL partnered with OCHCO, then developed and delivered training to all Component-level Reasonable Accommodation Coordinators and human capital points of contact. Procedures were submitted to EEOC on May 15, 2017 as required.

DHS continues to partner with the Department of Defense (DoD), Computer/Electronic Accommodation Program (CAP) to provide assistive technology accommodation solutions. During FY 2018, CAP provided 283 accommodations to 126 employees, totaling \$89,857.11 in cost savings to DHS.

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

Pursuant to 29 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. This guidance is now posted to DHS's public facing webpage at the following URL: <https://www.dhs.gov/reasonable-accommodations-dhs>.

In FY 2018 DHS drafted revisions to its existing Reasonable Accommodation procedures to include PAS. The initial draft was submitted to EEOC via the raprocedures@eoc.gov mailbox on September 28, 2018, for review as required. DHS received feedback and incorporated recommendations. The final is pending senior level review and approval. DHS anticipates issuing final procedures by the end of second quarter of FY 2019.

Section 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 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 No N/A

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

During FY 2018, DHS had a lower percentage of PWDs who filed a formal EEO Complaint (15.15%) alleging harassment, as compared to the government-wide average of 18.05%. DHS had 63 settlement agreements and one finding alleging harassment (hostile work environment) based on disability status during FY 2018. A summary of the corrective measures taken are as follows:

Finding # 1:

1. Post notice for 180 consecutive days.
2. Conduct eight hours of EEO training.
3. Consider disciplinary action against the supervisor.
4. Provide the opportunity to submit a request for attorney's fees.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?
Yes No 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 No N/A

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

During FY 2018, DHS had a lower percentage of PWDs who filed a formal EEO Complaint (8.02%) alleging failure to provide a reasonable accommodation compared to the government-wide average of 12.50%. The percentage of these complaints decreased by nearly 1.50% when compared to FY 2017.

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DHS had 48 settlement agreements and two findings alleging failure to provide a reasonable accommodation based on disability status during FY 2018. A summary of the corrective measures taken are as follows:

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

1. Post notice for 180 consecutive days.
2. Conduct eight hours of EEO training.
3. Consider disciplinary action against the supervisor.
4. Provide the opportunity to submit a request for attorney's fees.

Finding #2: Within 60 days after the date of the AJ Decision

1. Pay \$3,395.07 in pecuniary compensatory damages
2. Pay \$10,000.00 in non-pecuniary compensatory damages.
3. Pay \$38,550.78 in attorney's fees and costs.

Section 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 No

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

Yes No N/A

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

See following plans for Triggers 1 through 5:

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Trigger 1	Lower than expected participation for individuals with disability (PWD) and targeted disabilities (PWTD) when compared to the regulatory goals of 12 percent for PWD and 2 percent for PWTD in grade clusters GS 1 – 10 and GS 11 – SES.	
Barrier(s)	Not Identified	
Objective(s)	Increase workforce participation rates of PWD and PWTD at all grade levels.	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
Laura Davis, CRCL Ginny Berry, OCHCO Cynthia Clinton-Brown OAST		Yes Yes N/A
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
No		No
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	B1 – Total Permanent Workforce: PWD 10.46% below 12% Goal; Total Permanent Workforce PWTD 1.28% B14 – Separations by Disability: PWD Separating at rates (11.67%) higher than expected PWTD Separating at rates (1.58%) higher than expected
Complaint Data (Trends)	Yes	462 – (Part IV) Bases and Issues Alleged in Complaints Filed: Slight increase from 106 in FY 2017 to 118 in FY 2018 in total number of complaints alleging failure to accommodate resulting in a percent change of 11.32%. Increase from 164 in FY 2017 to 223 in FY 2018 in total number of complaints alleging harassment based on disability resulting in a percent change of 35.98%. No FEAR Act Report (as of 4th Qtr. FY 2018) – Complaints based on disability increased in the last six years from 10.23% of all complaints to 12.54% of all complaints in FY 2018. For the first time, trend data revealed that complaints filed on the basis of disability ranked as the fourth

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		<p>most common out of a twelve basis, since 2013.</p> <p>Considering complaints by issue, complaints based on “reasonable accommodation” ranked seventh out of thirty one issues during FY 2018 as of 4th Qtr. FY 2018 compared to tenth in FY 2013.</p> <p>DHS is also monitoring complaints by issue for “medical examinations,” which has also experience a significant increase from 8 in FY 2013 to 33 in FY 2018.</p>
Grievance Data (Trends)		
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	<p>462 Report FY 2018 – DHS showed increases in the total number of settlements based on disability harassment and reasonable accommodation when compared to FY 2017.</p>
Climate Assessment Survey (e.g., FEVS)		
Exit Interview Data	Yes	<p>DHS Exit Survey (excludes TSA and USSS)</p> <p>14.28% of respondents indicated they had a disability. Of these respondents the top three reasons for leaving include: Supervision/Management –11.63% Advancement Opportunities – 11.63% Personal/Family Related – 8.84%</p> <p>The top reasons mentioned above are the same as PWOD (IWOD). When comparing leaving based on health-related reasons, PWD (PWD) indicated health-related reasons as the primary reason 5.58% of the time compared to 1.82% for IWODs.</p> <p>Further review revealed a 4.18% response rate for employees indicating they had a targeted disability. Of the respondents who indicated they had a targeted disability, the top three reasons for leaving included: Advancement Opportunities – 11.11% Supervision/Management –11.11% Geographic Location and Salary Pay (tied) – 9.52%</p>

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		Health related reasons were indicated by 6.35% of the PWTD respondents.		
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)				
Other (Please Describe)	Yes	Utilization Analysis by Grade Cluster (Perm) PWD Grade Cluster 1-10 8.73% (below 12%) PWD Grade Cluster 11-SES 11.55% (slightly below 12%) PWTD Grade Cluster 1-10 1.29% (below 2%) PWTD Grade Cluster 11 – SES 1.27% (below 2%)		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
12/30/2017	Issue Annual Hiring Goals for PWD and PWTD and socialize throughout DHS.	Yes		12/27/2017
09/30/2018	Update DHS Disability training module for managers and HR Professionals (Employment of People with Disability: A Roadmap to Success Training)	Yes	10/30/2020	
03/30/2018	Develop mid-year reporting requirements to monitor Component progress with implementing the revised rule on Section 501 of the Rehabilitation Act.	Yes		3/08/2018
09/30/2018	Collaborate with OCHCO to revise DHS standard language on all vacancy announcements to encourage applicants with disabilities to apply, and to clearly explain Schedule A process and requesting reasonable accommodations.	Yes	09/30/2019	
09/30/2018	Revise Reasonable Accommodation procedures and include procedures for providing Personal Assistance Services.	Yes	10/01/2019	
09/30/2018	Develop and post notice of rights for	Yes		09/30/2018

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	employees and applicants under Section 508 of the Rehabilitation Act and the Architectural Barriers Act on the internal and external websites.			
03/30/2018	Implement and post Affirmative Action plan for Individuals with Disabilities to the DHS website internally and externally.	Yes	7/19/2018	07/19/2018
09/30/2020	Collaborate with OCHCO to explore the feasibility of considering disability status as a positive factor in hiring and promotions decisions to the extent permitted by law.	Yes	09/14/2018	
04/01/2019	Develop a bi-annual reports to monitor Components progress toward increasing participation of PWD and PWTD within Mission Critical Occupations.	Yes	9/14/2018	
Fiscal Year	Accomplishments			
2017	N/A - Newly established.			
2018	<p>Hiring Goals:</p> <p>During FY 2018, DHS set a 12 percent hiring goal for Persons with Disabilities (PWD) at all grade levels; a 2 percent hiring goal for Persons with Targeted Disabilities (PWTD) at all grade levels, excluding law enforcement and transportation security officer occupations; and a 1.5 percent hiring goal for Schedule A hires, also excluding law enforcement and transportation security officer occupations.</p> <p>As a result of these goals, 10.4 percent of new hires were PWDs and 1.7 percent were PWTDs in non-law enforcement related and non-TSO positions. While the Department did not meet the new hire goals listed above in these two areas, it should be noted that DHS ended FY 2018 with PWDs representing 10.5 percent of the total workforce and PWTDs representing 2.4 percent, both increases from FY 2017 (9.9 percent and 2.1 percent, respectively). In addition, Schedule A hires constituted 1.6 percent of all new hires in non-law enforcement related and non-TSO positions, exceeding the goal and increasing by 35 percent from FY 2017.</p> <p>To support and expand DHS’s outreach and recruitment, SRDI in coordination with CRCL began compiling a listserv of all disability organizations that will be maintained and distributed on an annual basis to all Component. The listserv will be finalized in FY 2019 for distribution and will including disability organizations such as America Job Centers,</p>			

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	<p>Veteran’s Vocational Rehabilitation and Employment Program, Centers for Independent Living and Employment Network providers.</p> <p>Disability Training:</p> <p>The Roadmap to Success training was updated during FY 2017 and FY 2018 to include the provision of the Final Rule covering Section 501 of the Rehabilitation Act, as well as other necessary revisions and updated resources. DHS plans to revise this training course by FY 2020.</p> <p>Mid-Year Reporting Requirements:</p> <p>CRCL issued a revised mid-year reporting requirement to all DHS Components to assist with monitoring and tracking progress in obtaining a Model EEO Program. The revised reporting format was modeled after the revised Part G Agency Self-Assessment, essential element program measures and trigger identification based on Part J Special Program Plan for the Recruitment, Hiring, Advancement and Retention of Persons with Disabilities. CRCL reviewed and compiled all Component responses and reported out the collective status of EEO programs and provided additional technical guidance where necessary.</p> <p>Revise DHS Standard Language on All Vacancy Announcements:</p> <p>CRCL initiated coordination efforts with OCHCO Policy and Programs with the recommendation of adding standard language to vacancy announcements to encourage persons with disabilities to apply. During FY 2018, DHS updated template language that is still under review by OPM. DHS CRCL in partnership with OCHCO will continue efforts to ensure effective implementation by the end of FY 2019.</p> <p>Revise Reasonable Accommodation and Personal Assistance Services Procedures:</p> <p>During FY 2018, CRCL drafted revised reasonable accommodation procedures to include procedures for processing personal assistance services consistent with the new obligations outlined in Section 501 of the Rehabilitation Act. As a result, DHS (Departmental), U.S. Coast Guard, the Transportation Security Administration, and U.S. Secret Service have all submitted either draft or final revised procedures to EEOC for review and approval pursuant to Executive Order 13164, during the reporting period. CRCL will continue to monitor and track the status and progress with the remaining Components in meeting this requirement. DHS’s procedures require all updated reasonable accommodation procedures to be submitted to CRCL for review prior to submission to EEOC.</p> <p>Develop and post notice of rights under Section 508 and the Architectural Barriers Act on the internal and external websites.</p>
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	<p>During FY 2018, DHS updated both its web page for accessibility and internal connect page (http://dhsconnect.dhs.gov/pages/accessibility.aspx) for consistency to include a description of rights and how to file a complaint under Section 508 complaint.</p> <p>Implement and post FY 2017 Affirmative Action Report and FY 2018 Plan</p> <p>As required, DHS posted its FY 2017 Affirmative Action Report and FY 2018 Plan on DHS' website at the following location. www.dhs.gov/reports-office-civil-rights-and-civil-liberties . CRCL continues to collaborate with OCHCO and Components to ensure effective implementation on a regular basis.</p>
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Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

Nothing to report.

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

To be determined.

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

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

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Trigger 2	Individuals with disabilities and targeted disabilities are receiving recognition and awards at rates lower than expected when compared to individuals without disabilities.	
Barrier(s)	Not Identified.	
Objective(s)	Collaborate with OCHCO to review recognition and awards policy, practices and procedures, and determine next steps.	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
CRCL OCHCO		
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
No		No
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	B13 Employee Recognition and Awards by Disability – Employees with disabilities (PWD) are receiving awards at rates comparable to their workforce participation rate. However, when comparing the rates of awards received by employees with disabilities to the inclusion rate, they are significantly lower than expected.
Complaint Data (Trends)	Yes	462 Report– DHS reported 4 out of 19 complaints were filed and 2 out of 4 settlements were based on disability and awards during FY 2018.
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	DHS had no findings of disability discrimination based on awards.
Climate Assessment Survey (e.g., FEVS)	Yes	Upon review of the FY 2018 FEVS, the largest variance between PWDs (53.9% positive) and IWODs (63.7%) is -9.7%, for Q 38 (Agency) - Prohibited Personnel Practices (for example, illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated. Further review of survey responses revealed a -2% variance for PWD (37.2% positive) compared to IWOD (39.2% positive) for Q 25 – Awards in my work unit depend on how well employees perform their jobs.

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Exit Interview Data		Upon review of the Exit Survey, the reason for leaving associated with “bonus” was reported by 18 employees or 1.20% of all respondents. Of those responses, only one respondent, self-identified as having a disability.		
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	N/A			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2018	Collaborate with OCHCO to review recognition and awards policy, practices and procedures, and determine next steps.	Yes	09/30/2019	
Fiscal Year	Accomplishments			
2017	N/A - Newly established.			
2018	<p>During FY 2018 CRCL identified initial data sources and policies and procedures at the departmental level to begin review. As initiated above, data sources reviewed include workforce data tables, complaint data, Federal Employment Viewpoint Survey responses, and the DHS Exit Interview Survey report.</p> <p>The following DHS Directives and Instructions have been identified for further review in coordination with OCHCO during FY 2019:</p> <p>255-02 Employee Recognition 255-02-001 Instruction guide on Employee Recognition 255-03-001-01 Time-Off Awards 255-01 Honorary Awards 255-01-001 Instruction guide on Honorary Awards 255-12 Approval of Monetary Awards over \$6,000</p>			

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

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

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

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To be determined.

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

DHS has modified the target date for completion to 09/30/2019.

Trigger 3	Unavailability of applicant flow data by disability distribution to effectively analyze percentage of qualified applicants for career development opportunities, promotions and new hires. Limited access to Applicant Flow data using current systems (USAStaffing/Cognos, Monster Government Solutions, and Learning Management Systems).	
Barrier(s)		
Objective(s)	Acquire accurate and reliable applicant flow data to analyze, monitor and inform program enhancements to increase representation of PWD and PWTB 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)		
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
No		No
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	No	DHS manually combines applicant flow data for promotions and new hires from USAStaffing/Cognos and Monster Government Solutions. DHS hopes to automate this process in the future. DHS is working to integrate or create the capability to enrich Learning Management System data with disability data in the future. In FY 2018, data was manually obtained for the SES CDP and mentoring programs.
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	

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Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	No			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	CRCL and OCHCO will work with OPM and Monster Government Solutions to modify data collection and reporting capabilities to match MD-715 data reporting requirements.	Yes		
09/30/2019	Coordinate with OCHCO to develop AFD framework for the SES Career Development Program, Pathways Program, and mentoring programs at the DHS level.	Yes		
Fiscal Year	Accomplishments			
FY 18	<p>CRCL and OCHCO will work with OPM and Monster Government Solutions to modify data collection and reporting capabilities to match MD-715 data reporting requirements.</p> <p>CRCL participates in monthly calls with OPM regarding applicant flow data and continues to work with OCHCO IT to integrate applicant flow data from OPM and Monster Government Solutions into a central data warehouse. Until the data flows to the central data warehouse, CRCL will continue to extract applicant flow data from OPM's USAStaffing system and obtain data directly or via data calls for DHS Components that use Monster Government Solutions.</p> <p>Coordinate with OCHCO to develop AFD framework for the SES Career Development Program, Pathways Program, and mentoring programs at the DHS level.</p> <p>In FY 2018, DHS reported participation and applicant flow counts and percentages for the SES Career Development Program, which is the only program managed at the Department level that leads to promotion without further competition. The SES Career Development Program was announced in USAJobs and USAStaffing was used to track</p>			

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	<p>applications, qualification, referral, and selection. The Department was able to obtain full applicant flow data for the SES CDP announced in FY 2018. The SES CDP program staff were able to provide data on participants.</p> <p>DHS will identify qualifying career development programs at DHS and courses that support those programs. Using data from our talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes, DHS will produce a report in compliance with MD-715.</p> <p>DHS achieved full operational capability for its talent management system (referred to as the Performance and Learning Management System, or PALMS) at six of the nine DHS Components, in August 2017. OCHCO exempted FEMA, TSA, and USCG from adopting PALMS. In FY 2019, DHS plans to identify the solution set for follow-on capability, including reporting capability, such as that required for MD-715.</p> <p>CRCL is working with OCHCO IT to obtain training and developmental opportunity participant data by diversity categories from PALMS and the central data warehouse. These systems are under development and diversity data will be added when feasible. Until the diversity data is available directly from PALMS and the central data warehouse, CRCL will continue to work with OCHCO to extract and manually determine the diversity status of developmental program participants.</p>
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Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

Planned activities proceeding on schedule.

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

No planned activities have been completed; proceeding on schedule.

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.

No planned activities completed; planned activities are anticipated to address the barriers.

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Trigger 4	Lower than expected conversion rates of eligible Schedule A employees into competitive service.			
Barrier(s)				
Objective(s)	Increase conversion rates of eligible Schedule A employees.			
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)		
CRCL OCHCO				
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)		
No		No		
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected		
Workforce Data Tables	Yes			
Complaint Data (Trends)	No			
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	Yes	Ad hoc workforce data on conversions - not included in MD715 data tables.		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2018	Review and analyze current policies and procedures for excepted service appointments.	Yes	09/30/2018	

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01/30/2018	Monitoring Schedule A Conversions on a quarterly basis.	Yes		12/12/2018
09/30/2018	Coordinate efforts with OCHCO to develop DHS Schedule A policy and procedures.	Yes	09/30/2019	
Fiscal Year	Accomplishments			
	<p>During FY 2018, DHS converted a total of 157 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 55.28 percent conversion rate. Of those converted, 138 were converted non-competitively after two years of satisfactory service, 15 converted to career or career conditional before 2 years of service, and 4 were converted by other means. Overall DHS experienced an increase in conversions when compared to 101, or 53%, %, during FY 2017.</p> <p>Review and analyze current policies and procedures for excepted service appointments.</p> <p>CRCL, in coordination with OCHCO/SRDI, began reviewing existing policies and procedures at the Department level during FY 2018. As a result, we identified several excepted service policies, and found that procedures for Schedule A, 5 CFR 213.3102(u), for hiring people with severe physical disabilities, psychiatric disabilities, and intellectual disabilities, are not included.</p> <p>Monitoring Schedule A Conversions on a quarterly basis.</p> <p>CRCL has developed a Schedule A reporting and tracking tool to monitor DHS' Schedule A workforce by Components. The tracking tool provides a summary review of Schedule A employees by:</p> <ul style="list-style-type: none"> • Total Eligible • Total Converted <ul style="list-style-type: none"> ○ Conversions to career or career conditional after 24 months ○ Conversions to career or career conditional before 24 months ○ Conversion Other ○ Separated before conversion • Total Separations • Eligible not Converted • No Longer Eligible at end of FY 2018 (<i>but was eligible at some point in the given year</i>) • Not Eligible for Conversion <p>CRCL shares updated summary reports with all Components through the Disability Employment Advisory Council, which includes Component level Disability Program Managers and Selective Placement Program Coordinators. Upon request, CRCL provides detailed reports to support follow-up actions at the Component level as appropriate.</p> <p>This activity is complete. CRCL will continue to provide reports and monitor on a quarterly basis as a standard practice.</p> <p>Coordinate efforts with OCHCO to develop DHS Schedule A policy and procedures.</p> <p>CRCL and SRDI began efforts to benchmark other Federal agencies to identify best practices. As a result, SRDI has drafted a proposed standard operating procedure which is currently in</p>			

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

N/A – DHS began planned activities during FY 2018, and concluded that additional time is necessary to effectively conduct a thorough review.
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For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

To be determined.

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

DHS has modified the target date for completion to 09/30/2019.
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Trigger 5	Higher than expected separation rates for individuals with disabilities.	
Barrier(s)		
Objective(s)	Increase retention rates of individuals with disabilities and targeted disabilities.	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
CRCL OCHCO		
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
No		No
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	B14 - Employees with disabilities separation rate of 11.7% is higher than their overall workforce participation rate of 10.5%. Employees with disabilities experienced a 0.6% increase when compared to FY 2017.
Complaint Data (Trends)	Yes	<p>462 – (Part IV) Bases and Issues Alleged in Complaints Filed: Slight increase from 106 in FY 2017 to 118 in FY 2018 in total number of complaints alleging failure to accommodate resulting in a percent change of 11.32%.</p> <p>Increase from 164 in FY 2017 to 223 in FY 2018 in total number of complaints alleging harassment based on disability resulting in a percent change of 35.98%.</p> <p>No FEAR Act Report (as of 4th Qtr. FY 2018) – Complaints based on disability increased in the last six years from 10.23% of all complaints to 12.54% of all complaints in FY 2018. Trend data revealed for the first time, complaints filed on the basis of disability rose from fifth to fourth ranking out of twelve basis, since 2013.</p> <p>Complaints by issue, reveals complaints based on “reasonable accommodation” ranked seventh out of thirty one issues during FY 2018 as of 4th Qtr. FY 2018 compared to tenth in FY 2013.</p> <p>DHS is also monitoring complaints by issue for “medical examinations,” which has also experience a significant increase from 8 in FY 2013 to 33 in FY 2018.</p>
Grievance Data (Trends)	No	

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Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No																													
Climate Assessment Survey (e.g., FEVS)	Yes	<p>DHS reported 8,648 out of 68,780 or 12.57% were respondents who reported to have a disability during the 2018 FEVS (more than the 12% goal of PWD).</p> <p>The largest variance between PWDs (53.9% positive) and persons without disabilities (63.7%) is -9.7%, for Q 38 (Agency) - Prohibited Personnel Practices (for example, illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated. Satisfaction with training received (Q68) had the second highest variance of -6.5%, and Opportunity to demonstrate leadership skills (Q43) had the third highest variance of -6.1% when compared to employees without disabilities.</p> <p>Further review of three questions used in the Best Places to Work report based on the FY 2018 FEVS, indicates an employee's intent to remain with an agency, reveals PWDs responded less favorably (combined difference of -6.2%) when compared to Individuals without disabilities. See following summary:</p> <table border="1"> <thead> <tr> <th>Item</th> <th>Item Text</th> <th>Gov</th> <th>DHS</th> <th>Non-PWD</th> <th>PWD</th> <th>Diff</th> </tr> </thead> <tbody> <tr> <td>Q40</td> <td>I recommend my organization as a good place to work.</td> <td>66.3%</td> <td>56.3%</td> <td>56.9%</td> <td>54.8%</td> <td>-2.1%</td> </tr> <tr> <td>Q69</td> <td>Considering everything, how satisfied are you with your job?</td> <td>68.3%</td> <td>60.4%</td> <td>61.1%</td> <td>58.0%</td> <td>-3.1%</td> </tr> <tr> <td>Q71</td> <td>Considering everything, how satisfied are you with your organization?</td> <td>60.4%</td> <td>50.6%</td> <td>51.2%</td> <td>50.1%</td> <td>-1.0%</td> </tr> </tbody> </table>	Item	Item Text	Gov	DHS	Non-PWD	PWD	Diff	Q40	I recommend my organization as a good place to work.	66.3%	56.3%	56.9%	54.8%	-2.1%	Q69	Considering everything, how satisfied are you with your job?	68.3%	60.4%	61.1%	58.0%	-3.1%	Q71	Considering everything, how satisfied are you with your organization?	60.4%	50.6%	51.2%	50.1%	-1.0%
Item	Item Text	Gov	DHS	Non-PWD	PWD	Diff																								
Q40	I recommend my organization as a good place to work.	66.3%	56.3%	56.9%	54.8%	-2.1%																								
Q69	Considering everything, how satisfied are you with your job?	68.3%	60.4%	61.1%	58.0%	-3.1%																								
Q71	Considering everything, how satisfied are you with your organization?	60.4%	50.6%	51.2%	50.1%	-1.0%																								
Exit Interview Data	No	See update under accomplishments.																												
Focus Groups	No																													
Interviews	No																													
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No																													
Other (Please Describe)	No																													

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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	1/30/2020	
01/30/2018	Monitor separations on a quarterly basis by disability distribution.	Yes		10/16/2018
06/30/2018	Collaborate with OCHCO to explore feasibility of implementing new retention programs specifically for PWD and PWTD.	Yes	09/30/2020	
09/30/2020	Conduct study on reasonable accommodation requests and procedures for delayed and denied accommodations to identify any potential correlation to high separations.		09/14/2018	
Fiscal Year	Accomplishments			
	<p>Upon review PWD continue to separate voluntarily and involuntarily at a higher rate when compared to employees without disabilities. The overall percentage of separations for PWD increased from 10.05 percent in FY 2017 to 11.67 percent in FY 2018. Similarly, PWTD experienced an increase for involuntary separations from 1.36 percent in FY 2017 to 2.11% in FY 2018, while voluntary separations for PWTD decreased from 1.62 percent in FY 2017 to 1.51 percent in FY 2018.</p> <p>Review and analyze exit surveys to identify barriers to retention. CRCL reviewed and analyzed data from the FY 2018 exit survey. Data revealed approximately 18% percent of all employees voluntarily separating indicated their primary reason for leaving resulting in 1,506 responses. Of those responses, 215 or 14.28% percent of the respondents indicated they had a disability.</p> <p>Of the respondents who indicated they had a disability, the top three reasons for leaving other than Retirement, Moving to Another DHS Component, or Other are the same for respondents without disabilities, including:</p> <p>Supervision/Management – 11.63% Advancement Opportunities – 11.63% Personal/Family Related – 8.84%</p> <p>CRCL also noted, when comparing leaving based on health-related reasons, respondents with disabilities indicated health-related reasons as the primary reason 5.58% of the time compared to 1.82% for respondents without disabilities.</p>			

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	<p>In September 2018, DHS OCHCO convened an exit survey working group due to the low participation rates overall. The working group is led by the DHS Engagement Team Lead, within the Chief Learning and Engagement Office, OCHCO and consists of representatives from all DHS Components to include representation from CRCL. The initial goal of the working group was to review current DHS Exit Survey and Component Exit Survey and provide recommended changes to the DHS survey that will improve participation and usefulness of data and review off boarding practices related to exit survey in order to determine best practices for improving participation. CRCL representatives will ensure consideration of disability related questions are included in the final submission of established core questions. The working group plans to achieve the goals outlined above and begin implementation by April 2019.</p> <p>The target date for completion on this activity will be extended for two years to allow for DHS to obtain reliable data to determine why employees with disabilities are leaving at a higher rate than employees without disabilities based on the inclusion benchmark.</p> <p>Monitor separations on a quarterly basis by disability distribution. CRCL developed a quarterly dashboard to monitor workforce demographics, which includes separations by disability. CRCL will continue to monitor separations on a quarterly basis as a standard practice.</p> <p>Explore feasibility of implementing new retention programs specifically for PWD and PWT.D. CRCL through coordinated efforts with OCHCO/SRDI will continue to identify strategies for increasing participation of employees with disabilities in existing DHS mentoring programs and career development programs. During FY 2018, CRCL requested all Components to advertise and encourage individuals with disabilities to consider applying to the DHS Headquarters Mentoring program and all other career development programs already in place throughout DHS to support our affirmative employment obligations.</p>
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Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

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

To be determined.

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

DHS has modified the target date for completion to 01/30/2020.