



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

Fiscal Year 2019



Homeland
Security

EEOC FORM
U.S. Equal Employment Opportunity Commission
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		2707 Martin Luther King Jr AVE SE Washington, DC 20528-0190	Washington	DC	20528	HS00	7000

Part B - Total Employment

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	192,199	18,928	211,127

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

Agency Leadership	Name	Title
Head of Agency	Chad F. Wolf	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 of 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 EEO 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 Manager, 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

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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.

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

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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	
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	

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 2019 (FY 2019) 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 (MD) 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 for employment. The report also provides the FY 2020 plan to address any programmatic deficiencies that were identified during 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 six related homeland security missions: 1) Counter Terrorism and Homeland Security Threats; 2) Securing U.S. Borders and Approaches; 3) Secure Cyberspace and Critical Infrastructure; 4) Preserve and Uphold the Nation's Prosperity and Economic Security; 5) Strengthen Preparedness and Resilience; and 6) Champion the DHS Workforce and Strengthen the Department. Since its formation, DHS has coordinated the transition of multiple agencies and programs into a single, integrated Department focused on protecting the American people and the homeland.

The Office for Civil Rights and Civil Liberties

The Office for Civil Rights and Civil Liberties (CRCL) supports the DHS mission to secure the Nation while preserving individual liberty, fairness, and equality under the law. CRCL is responsible for overseeing the integration of civil rights and civil liberties into all DHS activities. CRCL accomplishes this by: advising DHS leadership and state and local partners of ways to promote respect for civil rights and civil liberties in policy creation and implementation; informing individuals and communities whose civil rights and civil liberties may be affected by DHS policies and activities about policies and avenues of

redress; promoting appropriate attention within DHS to concerns and experiences of these individuals or communities; investigating and issuing recommendations regarding civil rights and civil liberties complaints filed by the public regarding DHS policies or activities, or actions taken by DHS personnel; and leading DHS's EEO programs and promoting workforce diversity and merit system principles. Responsible for this last mission area, CRCL's EEO and Diversity (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 established specific measures for each of the essential elements of a model EEO program. Beginning in the FY 2018 reporting cycle, the EEOC increased the cumulative 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 reporting measures for which the Department has responsibility. 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. All nine responded to the data call in time for inclusion into this report. The overall compliance rate with the six essential elements for DHS increased from 94.1 percent in FY 2018 to 94.3 percent in FY 2019. In FY 2018, FEMA did not provide a draft list of measures for inclusion in the Department's MD-715 report tally. Tabulating the FY 2019 percentage excluding FEMA allows for a comparison of the same DHS Components in FY 2018 and FY 2019. The overall compliance percentage in FY 2019 is 94.4 percent when FEMA is excluded from the calculation, a 0.3 percent increase compared to FY 2018.

The scorecard below shows the percentage of measures met for each of the essential elements by DHS Components that reported during FY 2018 and Components that reported in FY 2019. The percentages also include those measures reported at the Department level.

Model EEO Program Scorecard		
	FY 2018 % Met	FY 2019 % Met
Essential Element A: Demonstrated Commitment from Agency Leadership	96.5%	95.3%
Essential Element B: Integration of EEO into the Agency's Strategic Mission	91.1%	92.6%
Essential Element C: Management and Program Accountability	90.6%	91.7%
Essential Element D: Proactive Prevention of Unlawful Discrimination	90.2%	89.8%
Essential Element E: Efficiency	97.2%	96.1%
Essential Element F: Responsiveness and Legal Compliance	99.0%	100.0%
Total	94.1%	94.3%

Notes: 122 measures in FY 2017, 156 measures starting in FY 2018. In 2018, data for FEMA was not available at time of reporting. In 2019, data for all nine DHS Components was available for reporting.

Essential Element A – Demonstrated Commitment from Agency Leadership

- In March 2019, to coincide with National Woman’s History Month, the DHS Women in Law Enforcement (WLE) mentoring program was developed and implemented to utilize mentoring as a valuable career development tool and networking opportunity. The program, created for women law enforcement officers (LEOs), is the first of its kind in the Federal government. The 36 mentees were located across the country, and worked across DHS Components, including U.S. Customs and Border Protection (CBP), U.S. Immigration and Customs Enforcement (ICE), the Transportation Security Administration (TSA), the Federal Law Enforcement Training Centers (FLETC), and the U.S. Secret Service (USSS). The 36 mentors included retired and current law enforcement officers from DHS, and the Departments of Justice and the Treasury. The six-month program pilot included mid-cycle and final program evaluations.

The program also included presentations that focused on career development and advancement, transitioning from non-supervisory positions to supervisory roles, and the range of post-retirement options for LEOs nearing the end of their federal career. Feedback received from the mentee participants revealed that a majority had never participated in any career development program nor had a mentor. The mentees reported that during the program, for the first time they felt supported and encouraged to advance in their careers. They reported the coaching and assistance with goal setting was invaluable. The mentees and mentors believed that the WLE Mentoring Program should continue as a permanent career development program in DHS. The WLE Mentoring Program will continue as a permanent career development tool under the Department’s Federal Women’s Program. The second cohort of the WLE

Mentoring Program deployed in January 2020 during National Mentoring Month with 50 pairs. The six-month program will end in August 2020.

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

- The DHS Strategic Plan (2014 – 2018)¹ 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 (CMAS – CRCL)* is one of the seven highlighted performance measures for the Mature and Strengthen Homeland Security mission.

During FY 2019, CRCL continued its participation in recurring high-level strategic activities, including: the Secretary’s Bi-Weekly Component Heads’ meetings; DHS Chiefs of Staff meetings (composed of all 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 Chief Human Capital Officers); and the Workforce Planning Council, which shapes the workforce planning and workforce measurement programs for DHS.

Essential Element C – Management and Program Accountability

- CRCL continued to collaborate with the Office of the Chief Human Capital Officer (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 2018 MD-715 and a review of Affirmative Action Plans for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities.

¹ The objectives and goals in the DHS Strategic Plan (2014-2018) remained in effect pending the issuance of an updated strategic plan that was issued in November 2019.

- DMS provided a briefing on the FY 2019 Mid-Year Review 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 also made available to Components for their use when preparing their annual MD-715 reports.
- CRCL continued its collaboration with the Office of Accessible Systems and Technology (OAST) in the development and deployment of the Accessibility Compliance Management System (ACMS) 2.0. CRCL worked to ensure that the new system and enhancements provided an effective tool to manage and track reasonable accommodation requests. The ACMS 2.0's functionality ensures consistency with the record-keeping and reporting requirements for reasonable accommodations (RA) and Personal Assistance Services (PAS) as outlined in the EEOC's Final Rule amending 29 C.F.R. § 1614.203(d)(5).
- The DHS Corporate Recruitment Council (CRC), comprised of personnel from all of the DHS Components, coordinated the Department's recruiting presence across Components with respect to many organizations in FY 2019, 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; and
 - Society for American Indian Government Employees.

The CRC annually develops a Top 25 list of recruiting and outreach events that target diverse populations and events, including those focused on law enforcement, which represent approximately 40 percent of the positions at DHS.

- DHS continued use of the Pathways Programs (Pathways), the Federal government's primary entry point for students² and recent graduates³. In FY 2019, DHS hired 367 Pathways student interns, 216 recent graduates, and 10 Presidential Management Fellows, totaling 593 Pathways participants. Of these, 38 percent identified as members of a racial minority or ethnic group, and 50 percent were women.

² Current students in high school, college, trade school, or other qualifying educational institutions may apply to participate in the Pathways Student Internship Program.

³ The Recent Graduates Program targets recent graduates of trade and vocational schools, community colleges, universities, and other qualifying educational institutions or programs. To be eligible, applicants must apply within two years of degree or certificate completion.

- In FY 2019, DHS continued development of the Strategic Marketing, Outreach, and Recruitment Engagement (SMORE) enterprise system, formerly known as the Recruiting, Outreach, and Marketing Matrix (ROMM). The SMORE will provide real-time data analytics, hiring and recruitment forecasts, latent workforce gaps, and best practices to allow the Department to hire the workforce of the future. Further, the SMORE will hold DHS Components accountable on timely reporting of recruitment and marketing activities limiting the need of OCHCO Strategic Recruitment Diversity and Inclusion (SRDI) staff to ask Components for specificity on recruitment activities. The SMORE launched in the first quarter of FY 2020, and is now available for use by all DHS Operational Components. Further development and refining of the system will continue throughout FY 2020.
- CRCL’s Director of 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. DMS staff used applicant flow data to conduct data analyses and to complete the required MD-715 report data tables.
 - Encouraged the collaboration of DHS EEOD staff 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. With DHS Pride, the Department’s LGBTQ+ Affinity Group, sponsored “A Million Moments of Pride,” a program commemorating the 50th Anniversary of the Stonewall Riots, an event widely considered as the birth of the gay liberation movement. The program featured a keynote address by a prominent gay rights activist, Diego Sanchez of PFLAG, and recognition of a DHS employee, Brandon Montgomery, for his support of the Department’s LGBT Employment Program since its inception. He was also acknowledged for leading the collaborative efforts between the Department and DHS Pride.
 - Ensured the deployment of the DHS 2018 Campaign to Resurvey the Workforce on DHS Connect. This initiative encouraged DHS employees to review and update their disability status to ensure accurate documentation and the tracking of progress in achieving the Department’s employment goals for individuals with disabilities. The dissemination of this survey tool required a coordinated effort with all Component Heads, OCHCO, the Human Capital Leadership Council, and the Department’s Equal Employment Opportunity Directors’ Council. As a result of the nine pay period campaign that ended in January 2019, 788 permanent employees updated their disability profiles. These

updates resulted in an overall increase of 555 disability designations (Self-Identified Disability), and 57 targeted disability designations when compared to our baseline. DHS's total permanent participation rates increased for both individuals with disabilities (IWDs), from 10.38 percent to 10.71 percent, and individuals with targeted disabilities (IWTDs) from 1.27 percent to 1.29 percent.

- Ensured that the Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals with Disabilities continued as a major initiative within every DHS Component during FY 2019. In its support of these efforts, CRCL provided guidance, technical assistance, and feedback to all DHS Components to ensure their progress in complying with the new obligations outlined in 29 C.F.R. § 1614.203(d)(5). CRCL maintained a tracking mechanism to coordinate activities across the Department, managing and monitoring progress to ensure DHS's compliance with the regulatory requirements of 29 C.F.R. § 1614.203(d)(5).
- Coordinated and led quarterly DHS Disability Employment Advisory Council meetings, providing guidance and resources, including quarterly reports on the DHS Schedule A workforce conversions to increase coordination and conversion of these employees to career or career conditional appointments. Other resources and information covered throughout the year included updates on Workforce Recruitment Program (WRP), ACMS, service animals, RA and PAS procedural requirements, MD-715, and Mid-year reporting guidance.
- Ensured involvement in various recruiting initiatives targeting persons with disabilities throughout FY 2019, including the WRP 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 DHS disability employment program. Additions to the fact sheet included information on the final rule amending and clarifying affirmative action obligations under 29 C.F.R. § 1614, including references to DHS's Annual Affirmative Action Plan, guidance on Personal Assistance Services (PAS), and DHS's annual disability hiring goals.
- Revised the Department's reasonable accommodation procedures, including the provision for processing PAS requests. The revised draft DHS instruction outlines the procedures and now includes an appendix on PAS. The revised procedures are pending final review and approval under the Department's Directives System process, which includes coordinated DHS Component reviews.

- In observation of the 29th Anniversary of the Americans with Disabilities Act of 1990 (ADA), hosted a full-day training session. The training provided practical tips and advice on medical inquiries, determination of a disability, employer obligations regarding reasonable accommodation, and how federal courts and the EEOC view these issues. CRCL provided training to over 60 participants from DHS and Component Human Capital and Disability Employment Program professionals, as well as supervisors and managers, to increase their knowledge of disability employment issues.
- Coordinated with OCHCO Policy and Programs to issue guidance so that language encouraging applicants with disabilities to apply for positions was added to DHS/Component vacancy announcements.
- Continued engagement by supporting and participating in events and activities sponsored by the Department of Education's White House Initiative (WHI) on Historically Black Colleges and Universities (HBCUs). DHS, along with the Department of Justice, continued to lead the Campus Safety and Resilience Cluster, an HBCU cluster created to identify opportunities and address obstacles impacting the efforts of HBCUs to protect their campuses, students, and communities. The Campus Safety and Resilience Cluster continued its work 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. DHS EEOD staff led the Department's participation in the WHI HBCU 2019 National HBCU Week Conference, by sponsoring and moderating a panel, *Is Your Campus Safe? Building and Retaining Resilience*, bringing together representatives from the DHS Cybersecurity and Infrastructure Security Agency; the Department of Justice Office on Violence Against Women; Howard University School of Medicine Faculty; and the Vice-President for Safety/Chief, Department of Campus Safety and Security, Florida A&M University.
- Ensured DHS EEOD staff also secured the participation of DHS Components and Headquarters program office staff in the Current Student and Recent Graduate Career Fair and the inaugural HBCU Industry Day Event and Matchmaking Session held during the 2019 National HBCU Week Conference.
- 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 but not limited to, African American History Month and National Disability Employment Awareness Month. Throughout the year, three significant areas of the SEPs were promoted: observances, outreach, and barrier analysis.
- Represented the Department on the Federal Inter-Agency Holocaust Remembrance Committee Planning Team, supporting the annual program which featured Holocaust Survivors. DHS also contributed the plaques and awards that were given to 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-supervisory employee EEO training modules. A stand-alone module was also developed by CRCL to cover allegations of harassment which could be tailored for supervisory or non-supervisory audiences.
- CRCL provided basic EEO training to new DHS HQ employees every two weeks through the OCHCO's and the Cybersecurity and Infrastructure Security Agency's (CISA)⁴ New Employee Orientation programs.
- CRCL provided quarterly EEO training to supervisors participating in OCHCO's and the Office of Inspector General's HR Essentials Training programs.
- CRCL's training cadre delivered EEO and Diversity training to DHS Components. The training cadre consists of supervisory and non-supervisory employees.

⁴ On November 16, 2018, President Trump signed into law the Cybersecurity and Infrastructure Security Agency Act of 2018. Under this landmark legislation, the directorate formerly known as the National Protection and Programs Directorate (NPPD) became CISA. Until CISA formally sets up its Civil Rights Act, expected by ???, DHS HQ is assisting CISA, as had been the case when it was still part of DHS HQ as NPPD.

- CRCL led the effort to ensure that all DHS employees received mandatory anti-harassment training. Ninety-eight percent of DHS employees completed the mandatory training in FY 2019.
- CRCL led the effort in drafting and issuing DHS’s updated Anti-Harassment Policy.
- CRCL created an agency-wide working group charged with creating the departmental infrastructure for the implementation of the provisions in the Department’s Anti-Harassment Policy.
- DHS’s Disability Employment Program:
 - For FY 2019, DHS established (Department-wide and Component-specific) hiring goals of 12 percent for IWDs and two percent for IWTDs respectively in non-law enforcement related and non-Transportation Security Officer (TSO) positions. 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 these positions. For FY 2019, 11.3 percent of new hires were IWDs, and 2.3 percent were IWTDs, in non-law enforcement related and non-TSO positions. The Department successfully met the IWTDs new hires goal for the first time in FY 2019. It did not, however, meet the new hire goals for IWDs. DHS ended the fiscal year with IWDs representing 12.7 percent of the total workforce and IWTDs representing 2.1 percent (excluding law enforcement and TSO occupations), both showing increases from FY 2018 (10.4 percent and 1.7 percent, respectively). Schedule A hires comprised 3.0 percent of all new hires in non-law enforcement and non-TSO positions, doubling the goal with an increase of 1.4 percent when compared to 1.6 percent in FY 2018.
 - DHS continued its partnership with the Department of Defense (DoD) Computer/Electronic Accommodation Program (CAP) to provide assistive technology accommodation solutions to DHS employees throughout DHS. During FY 2019, CAP provided 368 accommodations DHS-wide to 134 employees, resulting in a cost savings of \$120,394.30 for DHS.

Essential Element E - Efficiency

During FY 2019, Components’ usage of the DHS Shared Neutrals Program increased by over 25 percent compared to FY 2018, resulting in an estimated cost savings of \$140,000.00 for DHS.⁵

- CRCL conducted two 90-minute refresher trainings for all mediators on the DHS Shared Neutrals roster.

⁵ The savings is approximated using the cost of procuring a contract mediator as opposed to no cost associated with using a DHS Shared Neutral Mediator.

- CRCL held two new mediator courses in FY 2019, adding 40 new mediators to the DHS Shared Neutrals roster.

During FY 2019, 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. Component EEO Offices have been able to use the feedback as an additional method to assess the quality of their ROIs. The tool has proven to be an effective way for CMAS to partner with Components to improve the quality of ROIs across DHS. Since the Tool's inception, DHS Component Complaint Managers have welcomed the thorough feedback and detailed comments and offered their own suggestions for improvement. The Complaint Managers share the feedback with their staff members and contractors as an objective improvement mechanism. Notably, the ROI Feedback Tool has been recommended as a best practice for other federal agencies by the EEOC.

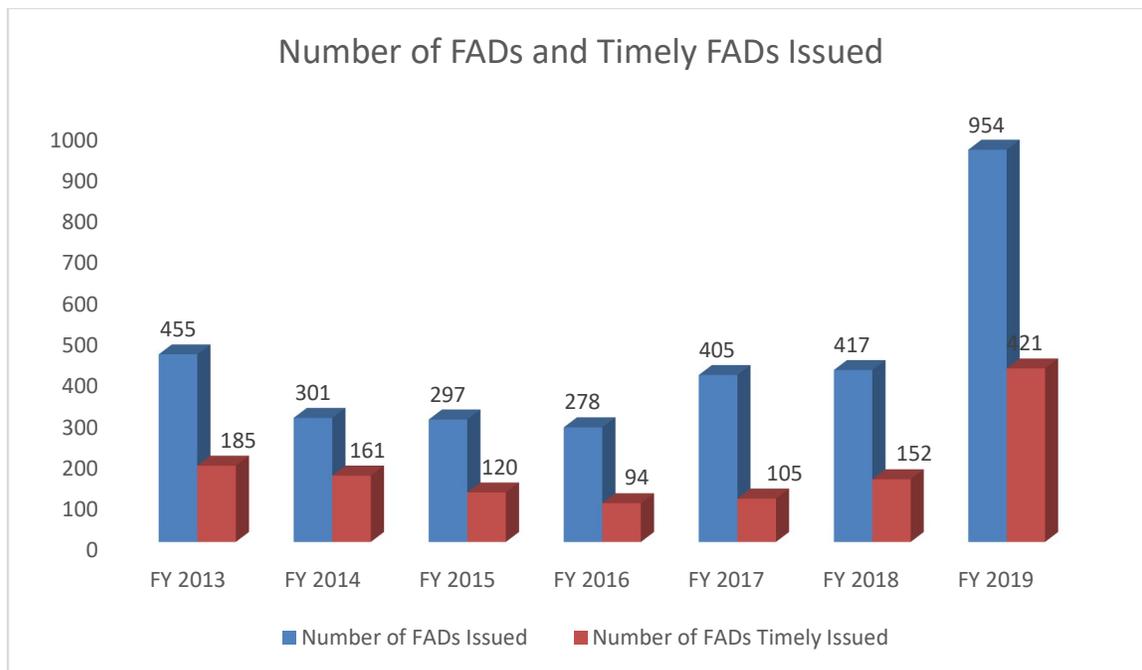
CMAS is required to vet DHS employees nominated to receive certain high-level awards from DHS leadership. The vetting consists of a review of EEO complaint histories to ensure there is no disqualifying information on the nominees including, but not limited to, having engaged in discriminatory conduct. During FY 2019, CMAS vetted over 2,100 employees. CMAS dedicated additional internal resources to this area and completed 98 percent of vetting requests by their requested due date.

The CMAS Compliance Program monitors Components' progress in the implementation of remedial relief in decisions issued by the EEOC in which discrimination was found. During FY 2019, CMAS collaborated with the EEOC's incoming Compliance Officer to establish an effective working relationship and, in turn, update Components on the new procedures.

EEOC Regulations, at 29 C.F.R. Part 1614, set forth regulatory timeframes for the issuance of final agency actions in EEO complaints. Merit FADs must be issued within 60 days of a complainant's election of a FAD, or 60 days following the election period if no request is received. Upon completion of the investigation in a mixed-case complaint, a final decision must be issued within 45 days, without an initial opportunity for a hearing. In cases where an EEO administrative judge issues a decision, the agency must issue a final action within 40 days of receipt of the judge's order. During FY 2019, CMAS issued or administratively closed 954 final agency actions in EEO complaints, including 832 merit final actions. DHS had an internal performance measure goal to issue 45 percent of merit final actions by their regulatory due date. Notably, 51 percent (421 of 832) of these merit-based final actions were timely issued. Accordingly, CMAS surpassed its timely issuance goal by six percent.

With respect to merit FADs, CMAS continued to strategically address its inventory. CMAS utilized its in-house adjudication resources primarily for FADs that could have been issued

within regulatory timeframes and assigned many of the older cases to a contract vendor to draft FADs. By fiscal year end, 178 cases were assigned to the contractor and 184 drafts had been received (some having been sent to the contractor in the prior fiscal year). This contract resource was invaluable in helping address the CMAS FAD inventory. Nonetheless, due to resource shortages within CMAS and increased incoming requests for final action, the backlog inventory grew from 172 at the beginning of FY 2019, to 311 at the end of the fiscal year. Addressing backlog inventory will continue as a focus in FY 2020.



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 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 for OAST during FY 2019 included:

- *DHS Accessibility Help Desk (AHD)*: The AHD 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 2019, the AHD processed 1,600 help desk requests from internal and external DHS customers.
- *Training Development/Delivery*: The OAST Training Program provides awareness and training on IT accessibility related topics. OAST offered seven⁶ different training courses and logged 6,825 course completions during FY 2019 through online, classroom, one-on-one, and hands-on trainings. In FY 2019, 70 individuals received their Trusted Tester 5.0 for Web certification. Since 2013, OAST has certified over 1,300 Trusted Testers worldwide.
- During FY 2019, OAST represented DHS as the co-chair of the Best Practices subcommittee on the Federal Chief Information Officers Council Accessibility Community of Practice. OAST led efforts to transition the operational support for the ICT Testing Baseline to the Federal CIO Council Accessibility of Practice to ensure sustainability and provide opportunities to extend the baseline. OAST presented at the California State University Conference (CSUN) on how to use U.S. Government accessibility resources to obtain accessible products through the acquisition process. OAST also served on the ACPC Steering Committee (a five-year cloud accessibility initiative funded by a U.S. Department of Education grant).
- *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 2019, OAST tested 32 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 remediated over 23,000 pages to ensure Section 508 conformance.
- *Governance*: During FY 2019, OAST developed the DHS Section 508 Playbook, a resource that defines how to address the Revised Section 508 standards throughout the Software engineering life cycle and the acquisition life cycle. OAST revised the DHS Accessibility Requirements Tool (DART) 2.0 Section 508 Contract Language Generation tool to improve ease of use, add additional training options, and enhance tailoring capabilities. OAST developed its Strategic Plan in alignment with the FY 2020 CIO Strategic Plan, including the identification of strategic technical support needs and envisioning a services-based delivery model to improve scalability of OAST program

⁶ 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).

support capabilities. OAST conducted extensive validation of the department-wide web accessibility report prepared by GSA. OAST worked with GSA to resolve errors and communicated valid issues to Component webmasters along with detailed instructions on how to remediate and independently validate. Overall, OAST reviewed 525 IT acquisitions valued at \$2.8 billion in DHS acquisitions and 2,171 HQ Change Control Submissions and enterprise architecture requests.

- OAST created new Section 508 Component Program Health Assessment Scorecard and process, integrated data collection into ACMS, and conducted Phase One initial interviews with all DHS Components.
- OAST also coordinated a cross-agency effort to address Section 508 test tool compatibility issues with the Salesforce platform and worked with the vendor to communicate remediation priorities for the department.
- Spearheading of efforts to develop a comprehensive developer accessibility roadmap and accessible testing tool evaluation process.
- Collaboration with the U.S. Access Board and GSA to draft a government wide approach to implementing the new Best Meets provision in the Section 508 standards.
- Collaboration with CRCL to create a department-wide Section 508 complaint management process.

Part E.3 - Executive Summary: Workforce Analyses

Workforce Profile and Trend Analysis

The DHS workforce trend analysis conducted on the permanent employee workforce is discussed herein. Temporary employees are not included because they are hired for temporary needs, with a predestined separation. The inclusion of the temporary employee population is less relevant to our analysis of employee movements through the human capital lifecycle.

The tables that follow 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 make up 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. Multiple years of data are provided to allow an 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 Components were cross-walked to the GS scale. This approach has been in place since the DHS FY 2017 MD 715 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 3,974 employees (2.11 percent) from 188,225 in FY 2018 to 192,199 in FY 2019.

DHS Permanent Workforce Trend for Hispanic or Latino Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY19	16.0%	11.8%	12.7%	14.7%	9.5%	13.7%	21.9%	11.1%	5.6%
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 – 16.0% of DHS, 5.2% of National Civilian Labor Force, 4.7% of Relevant Civilian Labor Force									

The workforce participation rate for Hispanic males at DHS is significantly above the NCLF and RCLF rates. In FY 2019, hires were above the statistically expected rates, and attrition was below the workforce representation rate. However, the promotion rate for Hispanic males remained slightly below the workforce participation rate. In addition, the representation of Hispanic males in Executive/Senior Leader pay grades dropped slightly, remaining 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 comparison. This job requirement, in conjunction with the high percentage of jobs located in the southwest Border States, greatly increases Hispanic male and female representation in these occupations.

DHS Permanent Workforce Trend for Hispanic or Latino Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY19	6.5%	8.1%	7.3%	9.0%	2.6%	10.0%	6.1%	3.8%	1.7%
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 – 6.5% of DHS, 4.8% of National Civilian Labor Force, 4.0% of Relevant Civilian Labor Force									

The workforce participation rate for Hispanic females at DHS increased slightly in FY 2019 and remains above the NCLF and RCLF participation rates. The hire rate decreased but remains above the NCLF and RCLF. The attrition rate also increased in FY 2019 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.

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
FY19	37.7%	33.3%	34.4%	33.0%	49.9%	26.8%	38.1%	46.5%	55.3%
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 – 37.7% 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 2019. It dipped below the NCLF rate in FY 2018 and remained below the RCLF rate in FY 2019. The hiring rate was 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 the Executive/Senior Leader grades. The participation rate at grades GS-13 – GS-15 has been trending downward for the White male group since FY 2010; at the Executive/Senior Leader level, the participation rate has been roughly steady for the past four years.

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
FY19	15.6%	17.2%	16.9%	17.0%	12.3%	17.4%	13.2%	17.2%	22.0%
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 – 15.6% of DHS, 34.0% of National Civilian Labor Force, 30.6% of Relevant Civilian Labor Force									

The White female participation rate at DHS was significantly lower than the NCLF and RCLF rates but reversed the decreasing trend in recent years with a slight increase. This hire rate continues to be above the participation rate, and the attrition rate decreased for the second consecutive year. 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.

DHS Permanent Workforce Trend for Black or African American Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY19	7.7%	8.8%	9.4%	7.9%	15.0%	9.5%	6.8%	6.9%	6.1%
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 three years. This group has increased representation in grades GS 13-15 since FY 2010, although participation in those grades remained below the overall representation rate. The promotion rate continued to exceed the participation rate.

DHS Permanent Workforce Trend for Black or African American Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY19	8.6%	11.2%	11.3%	9.8%	6.1%	13.1%	6.4%	7.4%	4.2%
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 remains above the NCLF and RCLF participation rates. This group was hired at a rate that was above the NCLF and RCLF since FY 2011. Their promotion rate was above the group’s 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 since FY 2010, the rate has been trending upward in GS 13-15 positions.

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
FY19	3.8%	4.3%	3.6%	3.9%	2.8%	4.2%	3.9%	3.3%	1.8%
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 – 3.8% of DHS, 2.0% of National Civilian Labor Force, 2.6% of Relevant Civilian Labor Force									

In FY 2019, 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 since FY 2010. The attrition and promotion rates were at parity with their participation rate.

Asian males are participating at a lower than expected rate at the pay grades GS 13 and higher, although their participation in grades GS 13-15 is slowly trending upward.

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
FY19	2.0%	2.6%	1.8%	2.3%	0.4%	2.4%	1.7%	2.1%	1.6%
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 – 2.0% 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 their NCLF and RCLF rates, and their hire rate was slightly above. In FY 2019, their 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, with representation close to parity at the higher grades.

DHS Permanent Workforce Trend for Native Hawaiian or Other Pacific Islander Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY19	0.37%	0.48%	0.28%	0.40%	0.00%	0.50%	0.37%	0.21%	0.32%
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 – 0.37% 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 declined, falling below the participation rate.

Native Hawaiian/Pacific Islander males' promotion rate exceeded their participation rate in FY 2019. Representation at grades 13-15 remained below the participation rate but has been slowly trending upward since FY 2010. Executive/Senior Leader representation has been roughly steady over the past three years.

Caution should be used when drawing inferences from the data for this group due to the relatively small proportion of the total workforce represented by this group.

DHS Permanent Workforce Trend for Native Hawaiian or Other Pacific Islander Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY19	0.25%	0.39%	0.35%	0.27%	0.00%	0.50%	0.18%	0.09%	0.00%
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 – 0.25% of DHS, 0.08% of National Civilian Labor Force, 0.08% of Relevant Civilian Labor Force									

Note: It should be noted that the percentages reported for Pacific Islander Females in the FY 2017 report contained an error. In the current report, 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 increased in FY 2019 and remains above the participation rate.

Native Hawaiian/Pacific Islander females are being promoted roughly at parity. They continue to participate at a lower than expected rate in the higher pay grades.

Caution should be used when drawing inferences from the data for this group due to the relatively small proportion of the total workforce represented by this group.

DHS Permanent Workforce Trend for American Indian or Alaskan Native Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY19	0.59%	0.51%	0.67%	0.53%	0.41%	0.51%	0.61%	0.63%	0.76%
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 – 0.59% 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 increased, while promotions remained below the participation rate.

Native American males were represented evenly throughout the range of pay grades, with participation at the Executive/Senior level decreasing while remaining above the participation rate. The change reflected the number of employees at this pay level decreasing from eight to seven in FY 2019.

Caution should be used when drawing inferences from the data for this group due to the relatively small proportion of the total workforce represented by this group.

DHS Permanent Workforce Trend for Native American Indian or Alaskan Native Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY19	0.30%	0.38%	0.36%	0.35%	0.14%	0.43%	0.24%	0.24%	0.11%
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 – 0.30% 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 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.

Caution should be used when drawing inferences from the data for this group due to the relatively small proportion of the total workforce represented by this group.

Summary of Triggers Identified in Workforce Trend Tables (FY 2010 - FY 2019)

Group	% of Permanent Workforce	% of Hires	% of Attrition	% of Promotions	% of GS 13-Exec/Sr Lead
Hispanic Male				Below Participation/ Rate Trending Up	Below Onboard/ No Change
Hispanic Female			Above Participation/Rate Trending Up		Below Participation/ Rate Trending Up
White Male	Below RCLF/ Trending Down	Below RCLF/ Trending Down		Below Participation /Rate Trending Down	
White Female	Below RCLF/ No Trend	Below RCLF/ No Trend	Above Participation/ Rate Trending Down		
Black Male			Above Participation/Rate Trending Up; No Trend since FY 2017		Below Participation/Rate Trending Up (GS13-15); No Change (Executive/SL)
Black Female			Above Participation/Rate Trending Up Since FY 2014		Below Participation/ Rate Trending Up
Asian Male					Below Participation/ Rate No Trend
Asian Female					Below Participation/Rate Trending Up (GS13-15); Trending Down (Executive/SL)
Pacific Islander Male*					Below Participation/Rate Trending Up
Pacific Islander Female*			Above Participation/Rate Trending Up		Below Participation/Rate Trending Up

Native American Male*		Below RCLF No Trend	Above Participation/Rate No Trend	Below Participation/Rate No Trend	
Native American Female*	Below RCLF No Trend	Below RCLF No Trend	Above Participation /Rate Trending Down		Below Goal Trending Up

* 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.

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 2019. For attrition, several of the groups that have a trigger are trending to a higher attrition rate. The 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 personal/work-life issues, management/supervisor, and lack of advancement opportunities. 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, family members stricken by illness, and the elderly.⁷ The 2019 Best Places to Work ranked DHS 17th out of 17 large agencies.⁸ The overall score of 52.3 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.

Lower than expected representation at higher pay grades, is seen in eight of the ten minority groups. Six of the eight groups are trending towards higher representation. Three groups, Black females, Hispanic males, and Hispanic females are participating at significantly lower rates than their expected rates in the higher pay grades.

DHS expects the upward trend seen in the representation of most minority groups in higher grades to continue. Over 66 percent of White employees in grades GS-13 and higher became

⁷ EEOC Women’s Work Group Report, 2011
https://www.eeoc.gov/federal/reports/women_workgroup_report.cfm
https://www.eeoc.gov/federal/reports/women_workgroup_report.cfm

⁸ DHS’s score lowered by 0.8 points this year.

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 group of employees at higher grades in the future.

Given the high-graded occupations that are largely Component-specific, the existence of a Component Part I to address the issue, and a persistent upward trend in representation of women and minorities in higher grades, a new Part I at the Department level was not created to address this trigger. DHS will continue its efforts to address barriers related to this trigger through recruiting, as well as the DHS EEO Directors' Council's 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
FY19	11.0%	11.0%	11.9%	12.3%	7.0%	9.3%	10.4%	13.2%	9.0%
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 – 11.0% of DHS, 16.6% 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 2019, rising to 11.0 percent for the permanent workforce, and 16.6 percent when excluding law enforcement occupations and TSA Transportation Security Officers who have physical entry requirements. These percentages include employees who have self-identified 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 narrowing in FY 2019. Hires held steady, while the promotion rate exceeded parity. Employees with disabilities are close to parity across the pay grades and are notably above parity in the GS 13-15 grades, with 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
FY19	1.26%	1.08%	1.59%	1.14%	2.0%	1.3%	1.1%	1.4%	1.1%
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 – 1.26% of DHS, 1.96% 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’s goal of 2.0 percent. The participation rate increased between FY 2010 and FY 2018, from 1.02 percent to 1.28 percent, then dropped slightly to 1.26 percent in FY 2019. Excluding law enforcement officers and TSOs, the overall FY 2019 rate is 1.96 percent, almost equaling the EEOC goal of 2 percent. Hires increased in FY 2019 but remain below the 2.0 percent federal goal. The attrition rate is above the participation rate.

Representation of this group is close to parity for the GS 13-15 and Executive/Senior Leader grades. Representation in promotions is below the representation rate.

DHS Employee Engagement, Satisfaction, and Inclusion

DHS has annually administered the OPM Federal Employee Viewpoint Survey (FEVS) between FY 2005 and FY 2019. In FY 2016, after six straight years of decline, the employee engagement index increased three percent, from 53 percent in FY 2015, to 56 percent. In FY 2017, DHS continued this trend, and the employee engagement index increased four percent to 60 percent. In FY 2018, the index remained at 60 percent, and in FY 2019 the index rose to 61.9 percent. DHS remained below the government-wide rate of employee engagement by seven percent.

DHS's Inclusion Index score increased one percent, to 54 percent, in FY 2019, yet it remains over 7 percent below the government-wide rate.

The overall DHS FEVS score is driven by its larger DHS Components. TSA and CBP account for 57.3 percent of DHS's completed surveys. Women reported higher year-over-year scores on the three main FEVS indices, Engagement, Global Satisfaction, and New Inclusion Quotient (New IQ) indices. American Indian/Alaskan Native, Native Hawaiian/Pacific Islander, and individuals with disabilities reported lower results on the three indices. Hispanic respondents reported lower results on the Engagement and New IQ indices and higher results on the Global Satisfaction index.

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 Congress⁹, the U.S. Government Accountability Office directed the Secretary of Homeland Security to instruct 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 when 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.

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 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 faced and how they handled them.

Following her approval of the study and its related recommendations, the Deputy Secretary, in her remarks during the Department-wide Women's History Month Program, announced the study's recommendations. In accordance with the related communications plan for the study, the CRCL Officer and CRCL Deputy Officer, Director, EEO, relayed the study's findings in presentations to the workforce and CRCL partners.

In FY 2019, CRCL deployed the Women in Law Enforcement Mentoring Program pilot during National Women's History Month. The pilot with 72 participants, paired 36 mentors, who had extensive federal law enforcement experience, with 36 mentees from across the Department. Over the year, the pairs collaborated and participated in group meetings that featured speakers

⁹ 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.

presenting on a myriad of topics including career advancement and retirement planning strategies.

Notably, DHS has the largest law enforcement population in the Federal government, but the lowest rate of participation by women. In FY 2018, women occupied approximately 8.4 percent of law enforcement positions at DHS. In FY 2019, women occupied 8.6 percent of the law enforcement positions at DHS. Although DHS enjoyed a 0.2 percent increase, the female participation rate remains substantially lower than expected.

Generally, the rate of women in law enforcement positions across the Federal government is 13.7¹⁰ percent. The rate of participation of women in law enforcement positions in the Department is not only lower than the remainder of the Federal government, 13.7 percent, but it is also lower than that seen in the occupational CLF for criminal investigators, 23.7¹¹ percent. The rate of participation of women in law enforcement positions is also lower than that seen in the occupational CLF benchmark for criminal investigators, 12.4 percent.

CRCL continues to educate the workforce on increasing opportunities for participation of women in the law enforcement occupations by providing briefings to Component-level senior leaders. CRCL briefed Women Executives (WE)@FAMS with participants consisting of senior leaders, including but not limited to Assistant Supervisory Agents-in-Charge, Supervisory Agents-in-Charge, and Senior Executive Service managers. Topics included the participation of women in the DHS workforce, how the TSA compared to other federal law enforcement agencies, and strategies being developed to aid in the retention of women, specifically, the Women in Law Enforcement Mentoring Program pilot.

Other actions taken by CRCL included:

- Participated in the Women in Federal Law Enforcement (WIFLE) Foundation 2019 20th 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.
- Coordinated invitations 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

¹⁰ Bureau of Justice Statistics, *Census of Federal Law Enforcement Officers, 2016*.

¹¹ Bureau of Justice Statistics, *Census of Federal Law Enforcement Officers, 2008*.

enforcement officers; coordinated with Strategic Recruitment Diversity and Inclusion, Human Capital Policy and Programs, and the Chief Learning Officer.

Data Sources

The workforce numbers used in this report were obtained using DHS's workforce data application, AXIS, and are based on an extraction from National Finance Center (NFC) data for Pay Period 19, which ended September 28, 2019. 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 IWDs/IWTDs in the Federal government were obtained from the OPM 2015 Report on the Employment of Individuals with Disabilities in the Federal Executive Branch¹².

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 were not available from a consolidated source and had to be obtained by separate data extract or data call to the relevant Components. The analysis team also learned in 2018 that applicant flow data for competitively announced SES positions are not included in the data extracts. The team met with senior leadership, and applicant flow data for SES positions is available and included in the 2019 data tables. 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 can 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,

¹² <https://www.opm.gov/policy-data-oversight/diversity-and-inclusion/reports/disability-report-fy2015.pdf>.

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.

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 of Equal Employment Opportunity and Diversity, 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.



7/10/20

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



7/10/20

Signature of Agency Head or Agency Head Designee
Cameron Quinn
Officer, Office for Civil Rights and Civil Liberties, U.S. Department of Homeland Security

Date

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

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	A.1 – The agency issues an effective, up-to-date EEO policy statement.	Measure Met? (Yes/No/NA)	Comments	Current Part G Questions 12-18-2019
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-DHS, HQ, USCIS	CBP Policy statement issued 06/5/2019. DHS Policy statement issued 10/11/2019. FEMA Policy statement issued 10/03/2019. FLETC Policy statement issued 03/21/2019. ICE Acting Director issued policy statement on 07/15/2019. TSA Policy statement issued 12/26/2019. USCG Policy statement issued 09/09/2019. USCIS Policy statement was submitted and signed by	A.1.a.2

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			Acting Director on 12/13/2019. USSS Policy statement issued 08/21/2019.	
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	A.2 – The agency has communicated EEO policies and procedures to all employees.	Measure Met? (Yes/No/NA)	Comments	
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)]	Yes		New
A.2.a.2	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	No-HQ		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)]	No-TSA	TSA Contact information was updated but posting has been postponed during COVID19	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	CBP https://www.cbp.gov/about/eero-diversity/reasonable-accomodation DHS https://www.dhs.gov/reasonable-accommodations-dhs	A.3.c

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			<p>FEMA https://intranet.fema.net/org/oa/ooer/Documents/Reasonable%20Accommodation%20Policy%20FM%20123-6-1.pdf</p> <p>FLETC https://www.fletc.gov/reasonable-accommodation-request-procedures-pdf</p> <p>ICE https://www.ice.gov/leadership/dcr</p> <p>TSA Internal: https://office.ishare.tsa.dhs.gov/sites/WPED/WPED Info Center/SitePages/ReasonableAccommodations.aspx External: https://www.tsa.gov/ab/out/jobs-at-tsa</p> <p>USCG https://www.uscg.mil/Family/Civil-Rights/faq/</p> <p>USCIS http://www.uscisgov/about-usaffirmative-action-plan-recruitment-hiring-advancement-andretention-persons-disabilities</p> <p>USSS https://www.secretservice.gov/join/diversity</p>	
A.2.c	Does the agency inform its employees about the following topics:			

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<p>A.2.c.1</p>	<p>EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often.</p>	<p>Yes</p>	<p>CBP Quarterly 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>FEMA The complaint process is discussed during new employee orientation training, supervisor essentials training and EEO posters are posted in duty stations.</p> <p>FLETC Annual training and posted on Intranet.</p> <p>HQ During new employee orientation and when training is requested.</p> <p>ICE Complaint process is discussed bi-weekly during new employee orientation, during mandatory training for new managers and supervisors, and during site visits.</p> <p>TSA Provided at least once every 2 weeks/26 times per year during new hires orientation in addition to our Biennial No FEAR Act training</p> <p>USCG</p> <ul style="list-style-type: none"> • Orientation 	<p>A.2.a</p>
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			<ul style="list-style-type: none"> • Biennially – No FEAR Act • Triennially – Civil Rights Awareness Training <p>USCIS Informs its employees about the EEO process when they onboard and, thereafter, annually.</p> <p>USSS</p> <ul style="list-style-type: none"> • New Employee Orientation (Biweekly) • Uniformed Division Introductory Course/Special Agent Introductory Course Training (twice monthly) • Anti-harassment Training (Monthly) • New Supervisors Training (Monthly) • Uniformed Division Leadership Training (Monthly) • Cornerstone Leadership Training (Monthly) • EEO Intake Process • EEO Posters • Internal and External Websites 	
A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Yes	CBP At least annually in pay stubs, information and FAQs posted prominently on cbp.gov and complainants are notified during the complaint process.	New

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			<p>FEMA Posted on the Intranet.</p> <p>FLETC Annual training and posted on Intranet.</p> <p>HQ During new employee orientation and when training is requested.</p> <p>ICE Policies are disseminated during the bi-weekly new employee orientation and information is on the Office of Diversity and Civil Rights intranet page. New managers/supervisors are informed of the process during mandatory training sessions.</p> <p>TSA Provided at least once every 2 weeks/26 times per year during new hires orientation in addition to our Biennial No FEAR Act training.</p> <p>USCG</p> <ul style="list-style-type: none"> • Orientation • Triennially – Civil Rights Awareness Training <p>USCIS Biannual ADR training for managers. Information is available for employees on the OEOL's Connect page.</p>	
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			<p>USSS</p> <ul style="list-style-type: none"> • Uniformed Division Introductory Course/Special -Agent Introductory Course (twice per month) • Anti-Harassment Training (Monthly) • New Supervisors Training (Monthly) • Uniformed Division Leadership Training (Monthly) • Cornerstone Leadership Training • EEO Intake Process • EEO Posters • Internal and External Websites • Early Dispute Resolution Policy (EDRP) 	
<p>A.2.c.3</p>	<p>Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.</p>	<p>Yes</p>	<p>CBP At least annually in pay stubs, information and FAQs posted prominently on cbp.gov and on-going RA training for managers and employees.</p> <p>FEMA The RA process is posted on the Intranet, communicated to all employees in the new employee orientation, supervisor essentials training, other trainings delivered and communicated to employees when RAs are requested.</p>	<p>New</p>

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			<p>FLTEC Annual training and posted on Intranet.</p> <p>HQ The RA process is communicated to all employees in new employee orientation training, supervisor essentials training, other training upon request, and when RAs are requested.</p> <p>ICE Policies are disseminated during the bi-weekly new employee orientation and information is on the Office of Diversity and Civil Rights intranet page.</p> <p>TSA HR Essentials Module on Reasonable Accommodation presented via Adobe Connect 2 times per year.</p> <p>Reasonable Accommodation information provided during new hires orientation every 2 weeks/26 times per year.</p> <p>Reasonable Accommodation awareness training provided to offices upon request.</p> <p>USCG</p> <ul style="list-style-type: none"> • Orientation • Triennially-Civil Rights Awareness Training 	
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			<p>USCIS Quarterly supervisor training and semi-annual employee overview.</p> <p>USSS</p> <ul style="list-style-type: none"> • New Employee Orientation (Biweekly) • Uniformed Division Introductory Course/Special Agency Introductory Course Training (twice per month) • Anti-harassment Training (Monthly) • New Supervisors Training (Monthly) • Cornerstone Leadership Training (Monthly) • Reasonable Accommodation Policy EES06 (05) • Internal and External Websites 	
A.2.c.4	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.	Yes	<p>CBP At least annually with issuance of Anti-Discrimination and Anti-Harassment Policy Statement, and ongoing EEO training.</p> <p>FEMA Posted on the Intranet.</p> <p>FLETC Annual training and posted on Intranet.</p>	New

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			<p>HQ Provided during new employee orientation.</p> <p>ICE AH policy is on ODCR's intranet site. ICE also provides AH policies and procedures biweekly during new employee orientation and during annual mandatory training for new managers and supervisors.</p> <p>TSA Annual Mandatory Online Learning Center (OLC) training and onsite briefings upon request.</p> <p>USCG</p> <ul style="list-style-type: none"> • Orientation • Biennially-No Fear Act • Triennially-Civil Rights Awareness Training. <p>USCIS Annually in Director's statement.</p> <p>USSS</p> <ul style="list-style-type: none"> • Uniformed Division Introductory Course/Special Agent Introductory Course Training (twice per month) • Anti-Harassment Training (Monthly) • New Supervisors Training (Monthly). 	
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			<ul style="list-style-type: none"> • Uniformed Division Leadership Training (Monthly) • Cornerstone Leadership Training (Monthly) • HRT-04(06) Prevention of Unlawful Harassment in the Workplace • Internal Website 	
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>CBP At least annually with issuance of Anti-Discrimination and Anti-Harassment Policy Statement and ongoing EEO training.</p> <p>FEMA Posted on the Intranet.</p> <p>FLETC Annual training and posted on Intranet.</p> <p>HQ Provided during new employee orientation.</p> <p>ICE Covered in the anti-harassment training that was provided to all employees this year and the standards of conduct has been published. It has not been determined how often the training going forward.</p> <p>TSA Management Directive (MD) 1100.73.3, “Anti-Harassment Program,” was signed on August 16, 2017 and sent to all employees via</p>	A.3.b

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			<p>a TSA broadcast message email. In addition, we provide new hire employee training every two weeks.</p> <p>USCG Communicated throughout the Agency on a regular basis.</p> <p>USCIS Anti-harassment training is required for all new employees and the EEO policy statement reaffirms the disciplinary action for inappropriate behaviors.</p> <p>USSS Information is continuously updated on the agency's website.</p>	
 Compliance Indicator  Measures	A.3 – The agency assesses and ensures EEO principles are part of its culture.	Measure Met? (Yes/No/NA)	Comments	
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	CBP Commissioner’s EEO/Diversity Award. During FY 2019: There were eight members of the Yuma Sector Diversity and Inclusion Program Committee and ten members of the Petroleum, Natural Gas and Minerals Center of Excellence. Diversity and Inclusion Program Committee received the Commissioner’s EEO/Diversity Award for championing CBPs commitment to a bias-free	New

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		<p>work environment and exemplifying EEO principles.</p> <p>FEMA Recognition provided via FEMA Administrator’s Awards, comprised of nine award categories, including: “Diversity Management and Inclusion”</p> <p>FLETC Recognition on FLETC Intranet, recognition luncheon/certificates for special emphasis committee participation.</p> <p>ICE Issues Director’s Outstanding Achievement in Diversity Management and Core Values Awards.</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 Civil Rights and Civil Liberties (CRCL) Awards Program.</p> <p>USCG</p> <ul style="list-style-type: none"> • Senior Leader Award • Affinity Group Awards 	
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			<ul style="list-style-type: none"> • Partnership in Education Award <p>USCIS issues up to two Directors Awards annually for Equal Employment Opportunity and Diversity Excellence. The award recognizes a USCIS employee, supervisor, manager, or team who has demonstrated superior commitment to further USCIS' goal to advance equality of employment opportunity, promoting a diverse workforce, and creating a workplace culture of inclusion.</p> <p>USSS Utilizes the Performance Appraisal process to provide Cash Awards, Time-off Awards, and Quality Step Increases to recognize the achievements and accomplishments of employees. Included in the rating are employees support for EEO and Diversity principles.</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
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.				

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 Compliance Indicator  Measures	B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.	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, USCIS	<p>CBP The EEO Director reports to Director, Privacy and Diversity Office who is under the direct supervision of the CBP Commissioner.</p> <p>FLETC The EEO Director reports to the Chief of Staff in the Directors Office and has unlimited access to the Director.</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.	<p>Yes</p> <p>N/A-TSA, USSS</p>	<p>FEMA Chief of Staff.</p> <p>FLETC Chief of Staff.</p> <p>TSA The TSA Assistant Administrator for Civil Rights & Liberties, Ombudsman and Traveler Engagement serves as the Principal EEO Director for TSA. The official reports directly to the agency head.</p> <p>USCG Reports to the USCG Vice Commandant.</p> <p>USCIS EEO Director reports to Acting Deputy Director.</p> <p>USSS EEO Director does report to the Director of the Secret Service.</p>	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

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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]	No-ICE	ICE The Office of Diversity and Civil Rights is taking action to be included in additional leadership meetings.	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-DHS	<p>CBP 05/15/2019.</p> <p>DHS Due to changes in acting DHS Secretaries during the year, the SOA brief did not get scheduled.</p> <p>FEMA On 06/20/2019, the EEO Deputy Director and Affirmative Employment Division Director briefed the Chief of Staff on the FY 2018 MD-715.</p> <p>FLETC 05/20/2019.</p> <p>HQ Provided briefing to FPS in Q1.</p> <p>ICE 07/07/2019.</p> <p>TSA The "State of the Agency" presentation was conducted on 03/26/2019.</p> <p>USCG 03/28-29/2019</p> <p>USSS 06/04/2019.</p>	B.2.b
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, Privacy and Diversity Office. The Executive Director, Privacy	New

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			Diversity Office is part of the Senior Management Team.	
 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 N/A-FEMA, FLETC, TSA, USSS		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>CBP The current Agency Strategic Plan runs through FY 2020.</p> <p>FEMA The EEO principles are identified here: "As an agency, diversity and inclusion is a key component in our ability to serve all people. We must continue to employ and retain diverse staff and coordinate with the whole community of emergency managers to ensure that the needs of the entire population we serve are considered.</p> <p>FLETC 3.1.1 Build a workforce for Today and Tomorrow. Develop, deploy and retain a high diverse high-quality workforce, rich in the technical and professional capabilities needed in their entry position and capable of accepting additional FLETC responsibilities in the future.</p>	New

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			<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 speaks directly to the ODCR mission.</p> <p>TSA Commit to Our People: TSA most important assets are the dedicated professionals securing our Nation's "Transportation 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 organization culture to promote an entrepreneurial spirit and operational excellence.</p> <p>USCG Recruits and retains an inclusive and diverse workforce that reflects the great diversity of the American public we serve. CG referenced the Strategic Plan 2018-2020.</p>	
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			<p>USCIS One of the strategic goals is to enable the 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>	
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, FEMA		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, FEMA		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, DHS, ICE	ICE The Office of Diversity and Civil Rights has requested staffing for a Complaints Manager and additional EEO Specialists for the Complaints and Resolutions Division.	E.5.b

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			However, these positions have not been funded.	
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 N/A-FLETC, TSA		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 (OPR), which is outside of the EEO Office. However, compliance activities related to harassment complaints made through the EEO process are managed by the EEO office (and referred to CBP's OPR).	New
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)]	Yes	ICE The Office of Diversity and Civil Rights appointed a compliance officer to improve on timeliness and respond to EEOC orders within stated	New

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			timeframes as set forth by orders and in agreements.	
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	CBP The EEO office is part of the CBP Privacy and Diversity Office, which is within the Office of the Commissioner. 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 New Indicator	
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
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

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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)]	No-ICE	ICE The Office of Diversity and Civil Rights provides the ADR policy memo to all new employees during new employee orientation, during supervisors leadership training, and provides a brief complaint summary to management officials when an ADR is scheduled.	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 N/A-FEMA, USCIS	CBP Barrier analysis is currently conducted by the EEO Office. FEMA Has not completed barrier analysis.	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-FEMA, USCIS	CBP Action plans are developed by the EEO office. FEMA Has not completed barrier analysis. USCIS Barriers have not 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 N/A-FEMA, USCIS	CBP Action Plans are implemented by the EEO Office. FEMA Has not completed barrier analysis.	D.1.c

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			USCIS Barriers have not been identified.	
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	
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 "yes", please provide the schedule for conducting audits in the comments section.	No-HQ N/A-FEMA, FLETC, TSA	<p>CBP Annual audits are conducted via Self-Inspection Program, which utilizes a stratified sampling methodology to distribute questionnaires.</p> <p>DHS Collects mid-year Part G updates from Components and conducts one-on-one reviews and meetings with Components to discuss program deficiencies.</p> <p>ICE The Office of Diversity Civil Rights notifies field offices of any EEO and/or workforce related barriers resulting from annual data reviews.</p> <p>TSA Does not have subordinate level Components.</p> <p>USCG Uses the Annual Command Checklist.</p>	New

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			<p>USCIS A program assessment is distributed to program offices and directors in Oct/Nov each year.</p> <p>USSS Assesses and enhances internal management accountability by conducting assessments of operation through an internal inspection process which reviews management and operational processes. The agency visually inspects field offices on a continuous basis ensuring they are in full compliance with the SS requirements to prominently display EEO information as well as conduct information regarding the program in locations accessible to employees.</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-HQ, USCIS N/A-FEMA, FLETC, TSA</p>	<p>CBP The annual audits conducted via Self-Inspection Program Corrections must be provided as follow up items.</p> <p>DHS Conducts reviews of Component MD-715 reports including identification of triggers, identification of barriers, and action plans to remove identified barriers.</p> <p>ICE The Office of Diversity Civil Rights notifies field offices of any EEO and/or workforce related barriers</p>	<p>New</p>

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			<p>resulting from annual data reviews.</p> <p>TSA Does not have subordinate level Components.</p> <p>USCG Uses the Annual Command Checklist.</p> <p>USSS See statement for measure above.</p>	
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)]	<p>Yes</p> <p>N/A-FEMA, FLETC, HQ, TSA, USCIS</p>	<p>TSA Does not have subordinate level Components.</p> <p>USCIS No field audits have been conducted.</p>	New
<p> Compliance Indicator</p> <p> Measures</p>	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)]	Yes	ICE updated its policy to comply with the DHS Anti-Harassment procedures issued in 2019.	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]	Yes		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)]	No-FEMA	FEMA will have a firewall as of 10/1/2019.	New
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	Yes		New

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	Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]			
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-FEMA, USCIS N/A-USSS	FEMA will make all employees aware of options. OER will not report on their behalf. USSS The EEO Director raised this question with CRCL and EEOC because the USSS was concerned about this requirement to have EEO Office report EEO Counseling activity to any other internal office. USSS is awaiting a response from EEOC.	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. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.	No-FEMA, HQ	FEMA Percentage completed timely is 29 percent. ICE The agency is timely in conducting prompt inquiries in the EEO process however we are untimely for non-EEO issues. Non-EEO harassment complaints are referred to the Joint In-take Center (JIC) for processing. The JIC is mandated to refer all cases to the Office of Inspector General, which extends the timeline beyond the 10-day timeframe. HQ Percentage completed timely is 0 percent.	New
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-FEMA		New

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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)]	Yes		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, FEMA, ICE, TSA, USCG, USSS	<p>CBP 25 percent of reasonable accommodation requests received in FY 2019 have been processed in the time frame set forth in CBP's reasonable accommodation procedures (15 business days).</p> <p>FEMA Data not available for FY 2019.</p> <p>FLETC 90 percent.</p> <p>ICE FY 2018, 31 percent of reasonable accommodation (RA), requests were processed within 15 business days, although the goal is to process 90 percent of RA requests within the time frame set forth in the agency</p>	E.1.e

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			<p>standard operating procedures.</p> <p>TSA 93 percent of all cases were processed within the time frame set forth in the reasonable accommodation procedures.</p> <p>USCG Processes accommodation requests in an average of 23.13 days in FY 2019, as compared to the time frame of 15 days in its reasonable accommodation procedures. 91.47 percent of accommodations are processed timely.</p> <p>USSS 90.5 percent of accommodation request for employee have been processed timely. (Average 9 days).</p> <p>100 percent of accommodation request for applicants have been processed timely. (Average 3 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-FEMA, ICE	<p>FEMA DHS is issuing PAS policy for the Department.</p> <p>ICE Drafted procedures, which are expected to be issued in FY 20.</p>	New
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-FEMA, ICE	CBP Personal Assistance Services requests are processed in the same manner as all other	New

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		<p>reasonable accommodation requests. See: https://www.cbp.gov/about/eo-diversity/reasonable-accommodation</p> <p>DHS https://www.dhs.gov/reasonable-accommodations-dhs</p> <p>FEMA DHS is issuing PAS policy for the Department.</p> <p>FLETC https://www.fletc.gov/external/personal-assistance-services</p> <p>ICE Drafted procedures, which are expected to be issued and posted in FY 20.</p> <p>TSA https://www.tsa.gov/ab/out/jobs-at-tsa</p> <p>USCG https://www.uscg.mil/Family/Civi-Rights/faq</p> <p>USCIS https://www.uscis.gov/about-us/affirmative-action-plan-requirement-hiring-advancement-and-retention-persons-disabilities.</p> <p>USSS The procedures are posted on the Agency's website.</p>
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			https://www.secretservice.gov/join/diversity/	
 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
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

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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 The 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 the 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	<p>CBP The 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 the 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.</p> <p>ICE The Office of Diversity and Civil Rights does not make recommendations. Instead it works with the Office of Human Capital and Office of Professional Responsibility for disciplinary actions.</p> <p>TSA The program office, with guidance from the Professional Responsibility and/or Chief Counsel program offices, has the final decision.</p> <p>USCIS No recommendations have yet been made.</p>	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	No-CBP, USCIS		New

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	EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]			
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-FEMA, 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, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	No-USCIS		New
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-FEMA, HQ		New
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	Yes		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-FEMA, 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 <i>Douglas v. Veterans Administration</i> , 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 N/A-FLETC	CBP In FY 2018, one manager received a letter of reprimand.	C.3.c

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			<p>ICE In FY 2019 one individual was disciplined and charged with official misconduct. Removal was proposed and is currently pending.</p> <p>TSA In FY19, TSA issued 34 Actions</p> <p>USCIS In FY 2019, 20 individuals were disciplined/sanctioned.</p> <p>USCG There were no findings of discrimination during the reporting period.</p> <p>USSS Reported even when there are no findings of discrimination and management' official have been found to engage in inappropriate conduct, disciplinary actions applied in accordance with ITG-04.</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 N/A-FLETC		New
 Compliance Indicator  Measures	C.6 – The EEO office advises managers/supervisors on EEO matters.	Measure Met? (Yes/No/NA)	Comments	
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	No-HQ	CBP Memoranda are issued quarterly with information on EEO complaints, workforce demographics, legal updates	C.1.a

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	<p>MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments column.</p>	<p>and special emphasis program updates.</p> <p>FEMA The EEO Office provides senior leadership updates annually through the agency’s 462 Report and MD 715 Report.</p> <p>FLETC Monthly.</p> <p>ICE Annually during Managers and Supervisors training.</p> <p>TSA Civil Rights & Liberties, Ombudsman and Traveler Engagement provided reports to Airports that included workforce demographics and complaint data to all visited sites throughout the FY.</p> <p>USCG Annually.</p> <p>USCIS The Annual State of EEO briefing to executives, demographic snapshots are available by request, EEO senior leadership conducts meet and greets with program offices and directorates on an ad hoc basis and when new Associate Directors onboard. Many supervisors and senior leaders in the field participate in monthly Summit meetings.</p> <p>USSS Annually.</p>	
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C.6.b	Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I]	Yes		New
Essential Element D: PROACTIVE PREVENTION This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.				
 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
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	CBP The agency has used workforce data, complaint/grievance data, exit surveys, and employee climate surveys to conduct trigger identification. There are continued plans to incorporate additional sources of information to assess human capital programs. FEMA The EEO Office reviews workforce data, complaint data, AHU data, as well as other sources for triggers.	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, USCG	CBP The agency utilizes a DHS exit interview tool and does not independently administer exit surveys or control questions contained therein. ICE On October 15, 2019, Office of Human Capital	New

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			<p>embedded an exit survey in the exit clearance process. The survey is launched when employees initiate their departure.</p> <p>TSA Exit Survey was reviewed to determine what questions need to be added; proposed questions were submitted to TSA Human Capital, Workforce Assessments Office; awaiting review/processing by the TSA Change Control Board</p> <p>USCG Uses the DHS exit survey and issues a link to departing employees to compete the survey. The DHS current exit survey does not include questions on improving the recruitment, hiring, inclusion, retention and advancement of persons with disabilities.</p>	
 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

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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 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.	No-HQ	<p>CBP Complaint data, exit surveys, program evaluations and special emphasis program.</p> <p>FLETC Complaint Data, DHS Exit Surveys, Federal Employee Viewpoint Survey, Reasonable Accommodation Data, D&I Program after action reports</p> <p>ICE The Office of Civil Rights and Diversity reviews the following: complaint/grievance data, employee climate surveys, focus groups, site visits and evaluative data from the special emphasis program.</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>USCG</p> <ul style="list-style-type: none"> • Complaints/grievance • DHS Exit Surveys • Employee Climate Surveys • Focus Groups 	New

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			<ul style="list-style-type: none"> • Affinity Group Council • AFGE Local 1495 • Program Evaluation Command Checklist • CG Anti-harassment program • Special Emphasis Program • FEVS <p>USCIS EEO complaints data, exit surveys, FEVS, USCIS climate survey, special emphasis programs, reasonable accommodation program, and annual program assessment of program offices and directorates.</p> <ul style="list-style-type: none"> • USSS • Complaints data • Exit survey data • Reasonable accommodation data • Anti-harassment 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 N/A-FEMA, USCIS	FEMA Has not conducted barrier analysis. No action plans have been developed yet.	New

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			USCIS No barriers have been identified.	
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 N/A-FEMA, USCIS	FEMA Has not conducted barrier analysis. No action plans have been developed yet. USCIS reported no barriers have been identified.	New
D.3.c	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	No-HQ N/A-FEMA, USCIS	FEMA Has not conducted barrier analysis. No action plans have been developed yet. USCIS No barriers have been identified.	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-FEMA, HQ	CBP https://www.dbp.gov/about/eo-diversity/diversity-inclusion DHS https://www.dhs.gov/reports-office-civil-rights-and-civil-liberties FLETC https://www.fletc.gov/affirmative-action-plan-pdf ICE https://insight.ice.dhs.gov/director/dcr	New

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			https://www.ice.gov/leadership/dcr TSA https://www.tsa.gov/about/jobs-at-tsa/individuals-with-disabilities USCG https://www.uscg.mil/Resources/Civil-rights/Reports-and-References USCIS http://www.uscis.gov/about-us/affirmative-action-plan-recruitment-hiring-advancement-and-retention-persons-disabilities USSS 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)?	No-ICE	ICE reported the average time to issue and acknowledgement letter in FY 2019 was 14 days.	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-FEMA, HQ, ICE	<p>FEMA The average processing time FY 19 was 223 days.</p> <p>FLETC Issuance occurs in fewer than 25 days.</p> <p>HQ reported average processing time is 76 days.</p> <p>ICE The average time to issue an acceptance letter in FY 2019 was 112 days.</p> <p>TSA In FY 2019, TSA took an average of 47 days to issue acceptance letters. The Department of Homeland Security is responsible for issuing final agency decisions dismissing complaints.</p> <p>USCIS The average number of processing days is 66.</p> <p>USSS The average processing time of issuing</p>	New

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			acceptance letters is 59.27 days. The average processing time of issuing dismissal letters by CRCL is 79 days.	
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-FEMA, ICE, USSS	ICE The agency works diligently to produce timely and complete investigations. The Office of Diversity and Civil Rights lacks necessary resources, however, to meet all regulatory timeframes. With decreased staffing from FY 2018 to FY 2019, the average investigation time increased from 360 days in FY 2018 to 436 days in FY 2019.	E.3.a.3
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)?	No-USSS N/A-FLETC	USSS Agency assessment revealed that some 180-day letters were not issued in accordance with EEOC guidance.	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-DHS N/A-All Components	DHS 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 N/A-All Components	DHS Final agency decisions (FADs) 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	FLETC Feedback provided to Vendor's Project Manager.	E.2.c

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			<p>HQ Contractors are held in accordance with their statement of work.</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>TSA Currently, TSA has agreements with two outside contractors for conducting investigations. The contracts have a penalty clause for poor work or delays.</p> <p>USCG The Performance Work Statement provides specific delivery accountability.</p> <p>USCIS Processing timeframes and sufficiency standards are included in the contract statement of work. If processing timelines or sufficiency standards are not met, the issue is first addressed with the contract firm. If the problem continues, the agency would exercise breach provisions in the contract.</p> <p>USSS Worked directly with Procurement Division to</p>	
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			remove contractors who do not comply with the performance statement of work. The Formal Complaints Program Manger monitors the work of contractors.	
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	CBP Acceptance/Dismissal decisions are final agency decisions which are reviewed and issued by CRCL. DHS Two dedicated attorneys, who have no role in the agency’s defensive function, are embedded. FLETC The Complaints Manager is a licensed attorney. HQ The office is staffed with two legal advisors from the Office of General Council	E.6.a

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		<p>(OGC) who provide legal sufficiency reviews.</p> <p>ICE The Office of Diversity and Civil Rights has two full time embedded attorneys from the Office of Principal Legal Advisor that review reports of investigation. They provide sound legal advice to various divisions within the Office of Diversity and Civil Rights and do not represent the Agency in any other manner.</p> <p>TSA Chief Counsel Labor and Employment Advice Section.</p> <p>USCG Legal sufficiency reviews are conducted by an attorney from the USCG's Office of Legal Counsel. This attorney does not represent the Agency in any EEO litigation matters.</p> <p>USCIS The EEO Specialist and Team Lead that do the sufficiency review are attorneys and the Complaints Manager that oversees all sufficiency reviews is also an attorney.</p> <p>USSS The attorney providing legal sufficiency review is located externally to the Washington, DC area.</p>	
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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
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 N/A-HQ		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)]	Yes		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:	Yes		

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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
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-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		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	CBP Conducts a trend analysis of EEO complaints as one of its regularly scheduled diversity reports (approximately every three years). DHS Monitors EEO complaint processing and prepares quarterly diversity reports. FEMA Director’s Dashboard: Data Analysis is conducted on a weekly basis. FLETC Trend analysis has been created for 2015-2019 for ERI and GS-1801 Major	E.5.e

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			<p>Occupational Series, and for Applicant Flow Data to track recruitment ROI.</p> <p>HQ Tracks complaint trends for program offices by issues and bases over several fiscal years and provide aggregate results with the program offices.</p> <p>ICE The Office of Diversity and Civil Rights Complaints division provides monthly updates to ICE program offices regarding complaint activity and areas of concern identified in complaint data. Diversity data is provided to program offices annually.</p> <p>TSA Internally, TSA collects program data and it is reviewed on a weekly basis by the EEO Director or a designated representative. It includes complaint, ADR and training/outreach data.</p> <p>USCG</p> <ul style="list-style-type: none"> • 462 Report • MD 715 • Plan of Action 2022 <p>USCIS In FY2019, USCIS conducted an analysis of the representation in the higher grades by Major Occupation.</p>	
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			<p>USSS Conducts periodic and annual assessments of the EEO Program.</p>	
<p>E.5.b</p>	<p>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.</p>	<p>Yes</p>	<p>CBP Participates in the DHS EEO Directors meeting; DHS Strategic Recruitment, Diversity, and Inclusion workgroup; and DHS ADR Council.</p> <p>DHS Leads the DHS EEO Directors meetings; Strategic Recruitment, Diversity, and Inclusion workgroup; and DHS ADR Council.</p> <p>FEMA Routinely benchmarks with other agencies and attends compliance meetings held at DHS.</p> <p>FLETC In processing of Conflict Cases and the development of our Reasonable Accommodation Directive.</p> <p>ICE Reviewed best practices across agencies to streamline processing of reasonable accommodation requests. RA procedures are currently being updated, as a result of the reviews conducted.</p> <p>TSA The EEO Director or a designated representative meets with other DHS EEO</p>	<p>E.5.g</p>

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			<p>directors on a monthly basis to discuss best practices.</p> <p>USCG Reviewed and adopted best practices from DHS. For example, USCG has adopted the practice of checking the facilities for Section 504 related accessibility by forming an interdepartmental working relationship with the Facilities Operation's Manager and DHS Safety and Occupational Health Manager. This best practice is currently on-going.</p> <p>USCIS Reviewed other agencies' resurveying practices, reasonable accommodation practices, and means and methods of analysis.</p> <p>USSS DHS hosts quarterly Disability Employment Advisory Council meetings where agencies share best practices for their Disability Programs.</p>	
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
<p>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.</p>				

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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	ICE In FY 2019, the Office of Diversity and Civil Rights appointed a compliance officer to improve upon timeliness and respond to EEOC orders within stated timeframes as set forth by orders and in agreements.	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	ICE In FY 2019, the Office of Diversity and Civil Rights appointed a compliance	E.3.a.7

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			officer to improve upon timeliness and respond to EEOC orders within stated timeframes as set forth by orders and in agreements.	
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	ICE In FY 2019, the Office of Diversity and Civil Rights appointed a compliance officer to improve upon timeliness and respond to EEOC orders within stated timeframes as set forth by orders and in agreements.	F.3.d (1 to 9)
F.3 - The agency reports to EEOC its program efforts and accomplishments.				
 Compliance Indicator  Measures		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)]	Yes		New

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

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.5 are new in FY 2019; the prior 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
DHS Component EEO program deficiencies	See Part G for list of DHS Components not meeting specific Part G measures. See Component Part H's for objectives, responsible officials, planned activities, and accomplishments related to each DHS Component deficiency.

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	9/30/2020	

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

Title	Name	Performance Standards Address the Plan? (Yes or No)
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	7/31/2020	
7/31/2019	CRCL/DMS staff meet one-on-one with each Component EEO function and review program deficiencies, actions, accomplishments, and plans	Yes	7/31/2020	
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	12/1/2020	

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2019	<p>Since these are ongoing, annual activities, DHS updated the Modified dates to 2020 although all three activities were completed for the FY 2019 reporting year.</p> <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>
FY 2018	Issued data call to all Components for mid-year update on all Part G measures; tabulated results; presented results to all Components at

	<p>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>
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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: The Department did not issue during FY 2018 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	10/11/2019	10/11/2019

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Officer, CRCL	Cameron Quinn	Yes
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	10/11/2019	
09/06/2019	Post final signed and dated EEO Policy Statement with written commitment to release yearly.	Yes	10/11/2019	

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2019	Issued policy email statement on 10/11/2019.

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 C.F.R. § 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 C.F.R. § 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	9/30/2020	

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

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 EEO 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	7/10/2019
9/30/2019	7. Develop a multi-year plan to issue final agency decisions within 60 days in accordance with EEOC regulations.	Yes	9/30/2020	

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2019	<p>Activity #1</p> <p>In FY 2019, DHS reported participation and applicant flow counts and percentages for the SES Career Development Program (CDP), which is the only program managed at the Department level that leads to promotion without further competition. The SES CDP, 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</p>

	<p>the SES CDP announced in FY 2019. The SES CDP program staff were able to provide data on participants.</p> <p>DHS also reported applicant flow data for the Women in Law Enforcement pilot mentoring program. This program does not lead to promotion without further competition but is managed at the Department level.</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 planned to identify the solution set for follow-on capability, including reporting capability, such as that required for MD-715.</p> <ul style="list-style-type: none"> • DHS completed its collection of training course completion data from all Components in November 2019. In FY 2020, DHS will begin using this data with other data sets to determine our ability to produce the MD-715 report. • DHS will continue to identify qualifying career development programs and courses that support those programs. Using data from 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 continue to produce a report in compliance with MD-715. <p>Activity #6 The ADR brochure was completed 7/10/2019.</p> <p>Activity #7 For FY 2019, CRCL issued 954 final agency actions, including 832 decisions that addressed the merits of allegations of discrimination. Notably, 51 percent (421 of 832) of these merit-based final actions were timely issued; accordingly, CMAS surpassed its timely issuance goal by 6 percent. Additionally, CMAS continued to strategically address its backlog of merit-based cases pending final agency decision (FAD). CMAS utilized its in-house adjudication resources primarily for FADs that could be prepared within regulatory timeframes and assigned many of the older cases to a contract vendor to draft FADs. By fiscal year end, 178 cases had been assigned to the contractor and 184 drafts had been received (some having been sent to the contractor the prior fiscal year). This contract resource was invaluable in helping address the CMAS FAD backlog; nonetheless, due to resource shortages within CMAS and increased incoming requests for final action, the backlog grew from 172 at the beginning of FY 2019, to 311 at the end of the fiscal year. Backlog reduction will continue to be a focus in FY 2020.</p>
FY 2018	<p>Activities #2, #3, #4, and #5 completed in prior years.</p> <p>Activity #1 In FY 2018, DHS reported participation and applicant flow counts and percentages for the SES Career Development Program (CDP), which is the only program managed at the Department level that leads to promotion without further competition. The SES CDP, 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</p>

	<p>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 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, require merit FADs to be issued within 60 days of election of, or failure to elect a FAD. Upon completion of the investigation in a mixed case complaint, a final decision will be issued within 45 days without 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. Further, CMAS amassed an inventory of pending merit FADs during the year. CMAS used a triage system, striving for efficiency to address its inventory. To further address the growing inventory, CRCL leadership approved funding for contract support to draft merit FADs. The contract approved in late fourth quarter of FY 2017, had a positive impact on the issuance of merit FADs in FY 2018. At the conclusion of FY 2018, CMAS was sufficiently staffed with analysts and support staff.</p>
FY 2017	<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 Regarding 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 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</p>
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expected representation of multiple Ethnicity and Race Indicators (ERI) groups and women at higher pay grades, 2) overall lower than expected rate of participation of women, and 3) lower than expected rate of participation of IWD and IWTD. The group observed that Component Parts I and J included the most significant triggers relevant to each Component. The group is exploring with the full DHS EEO Council the efficacy of establishing cross-Component barrier analysis teams to further explore the common triggers.

CRCL conducted a DHS-wide study on women in law enforcement. The report on the study, 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.

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

Activity #5: Completed 9/30/2016

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

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

In FY 2016, CRCL partnered with OCHCO Diversity and Inclusion staff and the Office of Human Capital Data Analytics to provide training and guidance to Component level EEO and HR Professionals. The training

included the data systems available to support MD-715 reporting requirements specifically DHS's Business Intelligence system powered by AXIS, NFC Insight, and USA Staffing Cognos.

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

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

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

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

Activity #7

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

Component Updates

Included by reference, per EEOC guidance.

MD-715 – Part H.5 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
B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.	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)]

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)
04/01/2020	Ensure sufficient budget and staffing to timely generate and issue final agency decisions in EEO complaints.	09/30/21		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Officer, CRCL	Cameron Quinn	Yes
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)
09/30/2020	Conduct staffing study to identify staffing/budget shortages in the Complaints Management and Adjudication Section (CMAS), which is responsible for issuing all of DHS's final agency decisions.	Yes		
12/13/2020	Based on the staffing study, prepare and submit justifications for staffing and related budget increases in CMAS.	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2019	CRCL formed a partnership with the Program Analysis and Evaluation Office, OCFO, and has initiated a staffing needs study across all of CRCL, which includes CMAS. The results of the staffing study are expected to be received by CRCL by the end of FY 2020.

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
Workforce data tables	Table A1	<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
Native Hawaiian or Other Pacific Islander Males – Yes, trending up

EEO Group
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 – FY 2019 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

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

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	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.) 1.a. OCHCO will implement exit survey DHS-wide.		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	1.f. OCHCO and CRCL will implement these interventions and continue in future years <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	2. Use Employee Viewpoint survey to identify changes needed to improve employee satisfaction. 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.		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
6/30/2011	3. Review promotion data.		6/30/2011

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
	3.a. CRCL will determine if there are areas or occupations with triggers in promotions annually.		
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 assess occupations and grade levels where there is substantial underrepresentation to identify skills, knowledge, and abilities by occupation; employees' training needs; and applicable career development programs.		3/31/2011

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2019	<p>Activity #1 The Department Exit Survey program is going through a transition period. Content and administration changes are under consideration. Currently TSA, CBP, ICE, and USSS all maintain their own exit surveys. CBP made the transition at the beginning of FY 2019. ICE deployed their survey on October 15, 2019. These Components share their results with the Department. Aside from retirement, the top reasons separating non-SES employees listed for leaving DHS were:</p> <ul style="list-style-type: none"> • Personal/Work-Life • Management/Supervisor • Advancement Opportunities. <p>Results are based on completed exit surveys. USSS, CBP and TSA results are included in the results above.</p> <p>Activity #2</p> <ul style="list-style-type: none"> • The 2019 FEVS results were overall positive, with the Employee Engagement Index increasing by two percentage points, the New IQ increasing by one percentage point, and Global Satisfaction staying steady. 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 is working with the Employee Engagement Steering Committee to develop Employee Engagement Action Plans targeting Component and sub-Component issues. <p>Activity #3 Part E covers the FY 2019 trigger analysis and information on Activity #3 b and c actions.</p> <p>Activity #4 The Department continues to offer various ways for employees to further their education goals. In FY 2019, 28 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 Masters and Executive Leaders Programs. DHS promotes the use of 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:</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 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 that will outline strategies to increase diversity in the SES cadre. In FY 2020 and beyond, DHS will also advertise for the SES CDP through its Employee</p>

	<p>Associations as well as the Strategic Recruitment, Diversity and Inclusion Council.</p> <p>Activity #6 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 Under Secretary 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. In FY 2019, the DHS Mentoring programs consisted of 479 mentees.</p> <p>Total = 479</p> <p>Gender Indicator (Mentors/Mentees)</p> <ul style="list-style-type: none"> • Men = 254 (53.1 percent) • Women = 225 (46.9 percent) <p>Ethnicity/Race Indicators (Mentors/Mentees)</p> <ul style="list-style-type: none"> • White = 276 (57.6 percent) • Black or African American = 107 (22.3 percent) • Asian = 31 (6.4 percent) • Hispanic or Latino = 50 (10.4 percent) • Native Hawaiian or Other Pacific Islander = 2 (0.4 percent) • American Indian or Alaska Native = 7 (1.4 percent) • Two or More = 5 (1.7 percent) • Missing = 1 (0.2 percent) <p>Disability Indicators (Mentors/Mentees)</p> <ul style="list-style-type: none"> • Do not self-identify as disabled = 412 (86.0 percent) • Self-identified as IWD = 35 (7.3 percent) • Self-identified as IWTD = 13 (2.7 percent) • Missing = 19 (3.9 percent) <p>Activity #7 Participant/Selectee Highlights from the DHS SES CDP Cohort I - VIII 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. <p>Note that DHS is developing a SES Diversity Plan to address issues of underrepresentation in the SES cadres. The plan will be released in FY 2019.</p>
FY 2018	<p>Activity #1 In FY 2018, 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>

- Personal or family related
- Supervisor
- Advancement opportunities

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

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.

As a result of the preliminary data analysis and information gathered through listening tours, DHS leadership over the course of FY 2019 will:

- 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.

Activity #3

Part E covers the FY 2018 trigger analysis and information on Activity #3 b and c actions.

Activity #4

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.

Activity #5

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 FY 2019 and beyond, DHS will also advertise for the SES CDP through its Employee Associations as well as the Strategic Recruitment, Diversity and Inclusion Council.

Activity #6

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 FY 2018, the DHS Mentoring programs coordinated 272 mentoring/mentee partnerships.

492 Mentors/Mentees Total

- 272 Mentees
- 220 Mentors

Gender Indicator (Mentors/Mentees)

- Men = 54 percent
- Women = 46 percent

Ethnicity/Race Indicators

- 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

The application period for the FY 2019 Mentoring Program commenced in October 2018 and closed on November 9, 2018.

Activity #7

Participant/Selectee Highlights from the DHS SES CDP Cohort I - VII Analysis:

	<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 FY 2019.
<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 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.</p> <p>Activity #3 Part E covers the FY 2017 trigger analysis and information on Activity #3 b and c actions.</p> <p>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</p>

	<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • DHS's Senior Executive Service Candidate Development Program, advertised both internally and externally to DHS; • DHS, in partnership with SkillSoft, offers almost 20,000 online learning resources. These online resources can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are subject to mapping to support competencies, job roles or blended learning offerings. • The leadership Development Channel, which is a resource that includes videos with the most current ideas, information, and know-how on business and leadership topics to address the informal learning needs of an organization. • Eight of the nine DHS Components have formal career development programs. <p>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.</p> <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 FY 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
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	<ul style="list-style-type: none"> • 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. <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 (PWD¹³) 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 X	No
b. Cluster GS-11 to SES (PWD)	Yes	No X

Based on the utilization analysis of the DHS workforce by grade clusters, DHS has a trigger for the GS-1 to GS-10 cluster in the permanent workforce when compared to the 12 percent regulatory onboard goal. A slight increase was reported in FY 2019 in the GS-1 to GS-10 grade cluster representing 8.99 percent compared to FY 2018 participation rate of 8.73 percent. For the first time, DHS is exceeding the 12 percent goal in the GS-11 to SES grade cluster, representing 12.27 percent compared to 11.55 percent in FY 2018.

2. Using the goal of 2 percent 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 X	No
b. Cluster GS-11 to SES (PWTD)	Yes X	No

Based on the utilization analysis of the DHS workforce by grade clusters, DHS continues to have triggers for both grade clusters in the permanent workforce when compared to the 2 percent regulatory onboard goal. In FY 2019, PWTDs participated at a rate of 1.26 percent in the GS-1 to GS-10 and the GS-11 to SES grade clusters, both representing minor decreases compared to FY 2018.

¹³ 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.

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

Numerical hiring goals are established for individuals with disabilities, targeted disabilities, and Schedule A hires, which are formally announced on an annual basis from the DHS OCHCO to all DHS Components via the Human Capital Leadership Council (HCLC). The HCLC is 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 continues to maintain a 12 percent hiring goal for Individuals with Disabilities at all grade levels; a 2 percent hiring goal for Individuals with Targeted Disabilities at all grade levels, excluding Law Enforcement and Transportation Security Officer occupations; and a 1.5 percent hiring goal for Schedule A hires, also excluding law enforcement and transportation security officer occupations.

In FY 2019, 11.25 percent of all (permanent/temporary) new hires were PWDs, and 1.14 percent were PWTDs. When excluding non-law enforcement related and non-TSO positions, the percentage of PWTd new hires represented 1.96 percent, nearly meeting the 2 percent goal. In addition, Schedule A hires constituted 2.25 percent of all new hires in non-law enforcement related and non-TSO positions, exceeding the goal representing a percent increase of 41 percent compared to FY 2018 (1.6 percent).

Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must: ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities; administer the reasonable accommodation program and special emphasis 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 the OCHCO’s Strategic Recruitment Diversity and Inclusion (SRDI) team 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.

Each Component maintains responsibility for servicing their respective workforce. The total FTEs are included in the counts in the following table.

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD.	92	9	28	Laura Davis, Disability Employment Program Manager, CRCL.
Answering questions from the public about hiring authorities that take disability into account	135	12	36	Laura Davis, Disability Employment Program Manager, CRCL.
Processing reasonable accommodation requests from applicants and employees	29	4	36	Laura Davis, Disability Employment Program Manager, CRCL; Darlene Avery for HQ requests; all other Component POCs are identified in their Component-level report.
Section 508 Compliance	18	1	36	Cynthia Clinton-Brown, Executive Director, Office of Accessible Systems and Technology, Office of the Chief Information Officer. (effective November 2018)
Architectural Barriers Act Compliance	53	1	0	Karl Johnson, Executive Director, Facilities and Operational Support, MGMT/FOS.
Special Emphasis Program for PWD and PWTD	16	1	0	Laura Davis, Disability Employment Program Manager, CRCL.

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 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.
- Sponsored the Americans with Disabilities Act Training on July 25, 2019. Provided eight hours of training to more than 60 participants including disability program managers, reasonable accommodation program managers and coordinators, human capital professionals, and managers and supervisors from across DHS. This full day session was facilitated by David Fram, Esquire, National Employment Law Institute.

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

Upon review of each Component’s response to compliance indicators and associated measures outlined in the Agency Self-Assessment, under B.4: The agency has sufficient budget and staffing to support the success of its EEO program. All Components are meeting the measures impacting successful implementation of the disability program during the reporting period.

In support of this measure, CRCL continued to encourage all DHS Components to utilize the Accessibility Compliance Management System (ACMS) to manage and track reasonable accommodations during FY 2019. During FY 2019, CRCL worked with the Office of Accessible Systems and Technology (OAST) and DHS Components to develop and deploy the ACMS 2.0 reporting tool to include new reporting features consistent with the reporting and record keeping requirements of 29 C.F.R. § 1614.203. Collaboration efforts continue utilizing a cross-Component working group approach to address system architectural requirements. Completion is expected by the end of FY 2020.

Section III: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

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

In FY 2019, DHS continued developing the Strategic Marketing, Outreach, and Recruitment Engagement (SMORE) enterprise system, formerly known as the Recruiting, Outreach, and Marketing Matrix (ROMM). DHS finalized the initial phase of requirements on SMORE automation and worked with Components to identify further DHS-wide requirements that were then included into the system. The SMORE will provide real-time data analytics, hiring and recruitment forecasts, talent workforce gaps, and best practices to allow the Department to hire the workforce of the future. Further, the SMORE will hold Components accountable on timely reporting of recruitment and marketing activities and will limit the need of OCHCO SRDI to ask Components for specificity on recruitment activities. The SMORE launched in FY 2020 Q1 and will be used by all DHS Operational Components. Further development and refining of the system will continue throughout FY 2020.

The DHS Corporate Recruitment Council (CRC) brings together key recruiting personnel from across DHS. The Council develops a “Top 25” list annually, of recruiting and outreach events that target diverse populations, including three that were focused on IWDs during FY 2019.

DHS also issues the Component Recruitment and Outreach Plans (CROP) annually to assist Components with short and long-term planning for mission critical occupations. The CROPs contain Component recruiting and outreach information for the upcoming FY’s activities focused on diverse populations, to include individuals with disabilities (IWD) and targeted disabilities (IWTd) as well as veterans and veterans with disabilities. Components provide details on planned activities to attract IWDs, IWTd, veterans and veterans with disabilities. With the full implementation of the SMORE, the CROPs will be obsolete as this information will be easily maintained in the SMORE platform.

Specifically, as it pertains to individuals with disabilities and targeted disabilities, DHS:

- Participated on a Federal government panel during the Maryland State Department of Education, Division of Rehabilitation Services, National Disability Employment Awareness Month program.
- Participated in Gallaudet University’s Fall and Spring Career Fairs.
- Promoted the top three recruiting events for PWDs/PWTDs on a monthly basis to the CRC to ensure Component attendance. The events included colleges/universities-sponsored programs, career fairs, and recruitment venues.
- Maintains strategic partnerships with national disability advocacy groups and provides Components with recruitment resources for IWDs/IWTd. DHS attended recruiting events at Gallaudet University, California State University, Northridge, National Technical Institute for the Deaf, Equal Opportunity Publications (EOP) Career Expo for People with Disabilities and Bender Virtual Career Fair for People with Disabilities.
- Attended over 75 recruiting events during FY 2019 in over 25 states to attract candidates who identified as a PWD/PWTD.
- Supported and promoted the Workforce Recruitment Program.
- Supported and promoted the Operation Warfighter Program.

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 PWTB 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))
 - TSA has its own distinct non-competitive appointment authority for hiring individuals with disabilities, that is comparable with the Schedule A Hiring Authority (HCM POLICY NO. 300-28),

To increase and promote the use of these hiring authorities, goals are established annually. In FY 2019, DHS hired 251 individuals with disabilities utilizing the Schedule A Hiring Authority, representing 2.25 percent of new hires excluding Law Enforcement and Transportation Security Officer occupations, significantly exceeding the FY 2019 goal of 1.5 percent.

Using the 30 Percent or More Disabled Veterans hiring authority, DHS hired an additional 1,148 individuals using authorities that take disability into account, representing 4.8 percent 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 (or equivalent for TSA) and the 30 Percent or More Disabled Veteran authority. Component Selective Placement Program Coordinators and Veterans Employment Program Managers are responsible for coordination of applicants who qualify under non-competitive authorities.

The Department recognizes that while it has an established policy on administering the employment of veterans, it does not currently have a policy covering the Schedule A Appointment Authority for Individuals with Disabilities. During FY 2018, DHS initiated benchmarking efforts with other Federal agencies in efforts of drafting standard operating procedures (SOPs) focusing on sound strategies and best practices for utilizing the Schedule A appointment authority for employment, retention, and career development opportunities. DHS plans to socialize and implement the final SOPs by 2021.

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 within sixty (60) days from onboarding and every two years thereafter.

The Roadmap to Success training was updated during FY 2017 to include the provision of the Final Rule amending 29 C.F.R 1614. § 1614.203(d)(5), as well as other necessary revisions. DHS plans to update and replace this training course by 2021.

In addition, each Component provides a variety of training covering disability employment and reasonable accommodations. Please refer to each Component's MD 715 report for more details.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT

ORGANIZATIONS

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

DHS Components continue to explore different avenues for reaching candidates with targeted disabilities such as the Career Expo for People with disabilities. Feedback on related disability hiring and recruitment events are captured within the SMORE, providing valuable information on the overall experience and success of each event, including attracting the right talent. This information also assists with benchmarking with similar activities providing a means to strengthen the Department's efforts to enhance outreach to applicants with disabilities and targeted disabilities. In FY 2019, DHS finalized a coordinated effort with all Components to update and revitalize the use of a consolidated listserv representing more than 550 organizations that assist individuals with disabilities including veterans with disabilities in securing and maintaining employment. The listserv will be maintained and updated on a regular basis as new organizations are identified, and partnerships are established. DHS used the listserv to promote participation in the EOP Career Fair for Individuals with Disabilities and in DHS-hosted webinars in advance of the career fair. As a result, 1,750 individuals with disabilities registered for the DHS webinars. Eight hundred thirty-nine IWDs participated in the webinars reaching over 140 organizational contacts from Maryland, Pennsylvania, the District of Columbia, Virginia, and West Virginia.

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

During FY 2019, DHS hired 2,223 PWDs, representing 10.97 percent of all permanent hires, a slight decrease from 11.03 percent of hires reported in FY 2018. DHS did not reach the hiring goal for PWTD. PWTD represented 1.08 percent of all permanent hires falling below the 2 percent hiring goal.

Notably, when excluding law enforcement and transportation security officer occupations, DHS surpassed both the 12 percent hiring goal for PWD representing 19.97 percent of hires and the 2 percent hiring goal for PWTD, representing 2.02 percent.

Disability workforce data includes (1) employees who self-identify as having a disability, (2) employees appointed under Schedule A, and (3) 30 percent or more Disabled Veterans who do not otherwise identify as having a disability.

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

Based on a review of B6 New Hires by MCO which represents AFDs from USA Staffing/Cognos and Monster Government Solutions and actual hires data from the National Finance Center via AXIS for all DHS Components, triggers exist for the following occupations of the nine (9) priority mission-critical occupations for PWD and PWTD:

PWD: Four out of nine MCOs

0083 – Law Enforcement: Qualified External Applicants not available for new hires; Selections 27.27 percent

1895 - Customs and Border Protection Officer: Qualified External Applicants not available for new hires; Selections 1.45 percent

1896 - Border Patrol Agent: Qualified External Applicants not available for new hires; Selections 0.47 percent

1881 - Customs and Border Protection Interdiction Agent: Qualified 16.67 percent; Selections 1.85 percent

PWTD: Seven out of nine MCOs

0083 – Law Enforcement: Qualified External Applicants not available for new hires; Selections 27.27 percent

1802 - Compliance Inspection and Support: Qualified 1.61 percent; Selections 0.75 percent

1895 - Customs and Border Protection Officer: Qualified External Applicants not available for new hires; Selections 0.06 percent

1896 - Border Patrol Agent: Qualified External Applicants not available for new hires; Selections 0.20 percent

1811 - Criminal Investigator: Qualified 0.63 percent; Selections 0.00 percent

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

0089 - Emergency Management Specialist: Qualified 4.80 percent; Selections 0.00 percent

All of the above mission-critical occupations listed above, with the exception of 2210 and 0089, have physical and or medical requirements that cause lower than expected selection rates for PWTD.

Note: Due to OPM restrictions on access to job applicant flow data, applicant flow data are only available for job announcements that are closed and fully audited. Because of this rule, certain MCO AFD was not available.

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. The applicant may qualify based on experience obtained prior to entry into their current job series or DHS. DHS has not attempted to develop an estimate for job series-relevant applicant pools to date. Consistent with prior practice, DHS will not attempt to tabulate relevant applicant pools for this reporting cycle.

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

- | | | | |
|------------------------------|-----|---|----|
| a. Promotions for MCO (PWD) | Yes | X | No |
| b. Promotions for MCO (PWTD) | Yes | X | No |

A review of B6 Internal Competitive Promotions by MCO was conducted. The applicant flow data was derived from USA Staffing/Cognos and Monster Government Solutions along with the actual hires data from the National Finance Center via AXIS for all DHS Components. Triggers exist for the following occupations for PWDs and PWTDs when comparing the qualified applicant pool to the number of selections for promotions:

PWDs

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

0089 - Emergency Management Specialist: Qualified 11.17 percent; Selections 8.93 percent

PWTDs

1801 - General Inspection, Investigation & Compliance: Qualified 3.37 percent; Selections 2.05 percent

1895 - Customs and Border Protection Officer: Qualified 0.25 percent; Selections 0.13 percent

1802 - Compliance Inspection and Support: Qualified 1.02 percent; Selections 0.45 percent

1881 - Customs and Border Protection Interdiction Agent: Qualified 0.19; Selections 0.00 percent

0089 - Emergency Management Specialist: Qualified 8.12 percent; Selections 0.89 percent

2210 - Information Technology Management: Qualified 3.58 percent; Selections 0.37 percent

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

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

A. ADVANCEMENT PROGRAM PLAN

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

All managers and supervisors are encouraged to promote the career development of all employees, including individuals with disabilities and individuals with targeted disabilities. CRCL continued to promote opportunities through its Disability Employment Advisory Council. CRCL requested that each Component Disability Program Manager share and encourage its employees with disabilities to participate in career development and advancement programs.

In FY 2019, DHS reviewed the feasibility of developing a mentoring program focused on individuals with disabilities. A woman in law enforcement mentoring program launched in FY 2019 will be used as the model for DHS employees with disabilities in FY 2020. CRCL will implement the mentoring program in April 2020.

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 educational goals. In FY 2019, 28 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 that can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are aligned to support competencies, job roles or blended learning offerings.
- The DHS Leader Development Program establishes required and optional development activities throughout the year for new and seasoned leaders at all levels across DHS. DHS continues to use the Pathways Program, the Federal government's primary entrance point for students and recent graduates. In FY 2019, DHS hired 367 Pathways student interns, 216 recent graduates, and 10 Presidential Management Fellows, totaling 593 Pathways Program participants. Of these, 8.77 percent identified as PWDs and 1.18 percent were PWTDS.
- The DHS Mentoring Program is a formal program that provides enriching experiences through reciprocal relationships and opportunities for personal and professional growth while sharing knowledge, leveraging skills, and cultivating talent. The DHS Mentoring Program is open to all DHS federal employees. The mentoring announcement is sent by the DHS Management Directorate to all DHS employees. Training is provided to mentor applicants. The types of mentoring offered include: Speed Mentoring, Flash Mentoring, Situational Mentoring, Reverse Mentoring, Group Mentoring, and Peer Mentoring. The program is evaluated with feedback provided on its successes and areas of improvement. The Mentoring Connection contract that coordinates the program has been extended. In

FY 2019, the DHS Mentoring programs consisted of 497 mentees. Of the participants, 7.3 percent self-identified as having a disability and 3.9 percent self-identified as having a targeted disability.

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs (Pathways Intern)		367		4.63%		0.82%
Fellowship Programs (Pathways Recent Graduates)		216		4.17%		1.85%
Presidential Management Fellows		10		0.00%		0.00%
Mentoring Programs		497		7.3%		3.9%
Coaching Programs						
Training Programs						
Detail Programs						
Other Career Development Programs DHS SES CDP	500	44 selectees; however only 42 selectees participated in the program.	3.19%	2.20%	1.80%	0%

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.

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 planned to identify the solution set for follow-on capability, including reporting capability such as that required for MD-715.

- DHS completed its collection of training course completion data from all Components in November 2019. In FY 2020, DHS will begin using this data with other data sets to determine its ability to produce the MD-715 report.
- DHS will continue to identify qualifying career development programs and courses that support those programs. Using data from its talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes, DHS will continue to produce a report that complies with MD-715.
- DHS will continue to include encouraging language in all career development programs to increase the participation of PWDs.

Do triggers exist for PWTDs 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 2019, 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 PWDs to the 12 percent goal and PWTDs to the 2 percent goal, neither group participated at rates expected in the programs outlined above.

C. AWARDS

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

a. Awards, Bonuses, & Incentives (PWDs)	Yes X	No
b. Awards, Bonuses, & Incentives (PWTDs)	Yes X	No

Based on a review of MD-715 Table B9-1: Employee Recognition and Awards - Distribution by Disability, PWDs (IWODs) and PWTDS (IWTDs) are not receiving awards at the expected rates when compared to the corresponding inclusion rate of PWODs (self-reported as no disability). DHS-wide, data was provided for the following award categories:

PWDs		Benchmark	
Time-Off Awards 11 – 20 Hours	PWDs Inclusion Rate: 16.91%	IWODs Inclusion Rate: 22.27%	
Cash awards \$1 – \$500:	PWDs Inclusion Rate: 44.64%	IWODs Inclusion Rate: 76.06%	
Cash awards \$1,000 – \$1,999:	PWDs Inclusion Rate: 26.39%	IWODs Inclusion Rate: 33.32%	
Cash awards \$2,000 – \$2,999:	PWDs Inclusion Rate: 10.88%	IWODs Inclusion Rate: 11.10%	
PWTDS		Benchmark	
Time-Off Awards 11 – 20 Hours	PWTDS Inclusion Rate: 13.59%	IWODs Inclusion Rate: 22.27%	
Time-Off Awards 21 – 30 Hours	PWTDS Inclusion Rate: 7.64%	IWODs Inclusion Rate: 8.27%	
Cash awards \$1 – \$500:	PWTDS Inclusion Rate: 60.43%	IWODs Inclusion Rate: 76.06%	
Cash awards \$1,000 – \$1,999	PWTDS Inclusion Rate: 24.20%	IWODs Inclusion Rate: 33.32%	
Performance Base Pay Increase	PWTDS Inclusion rate: 2.35%	IWODs Inclusion Rate: 2.92%	

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

- | | | |
|--------------------------|-------|------|
| a. Pay Increases (PWDs) | Yes | No X |
| b. Pay Increases (PWTDS) | Yes X | No |

Based on a review of MD-715 Table B9-1: Employee Recognition and Awards - Distribution by Disability, PWDs are comparable and PWTDS are exceeding the inclusion rate benchmark for quality step increases (QSIs). A trigger in the Performance Based Pay Increase award category was identified for PWTDS, described below:
 PWTDS Inclusion Rate: 2.35% vs. IWODs Inclusion Rate: 2.92%

3. If the agency has other types of employee recognition programs, are PWDs and/or PWTDS 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 (PWDs) | Yes | No |
|--------------------------------------|-----|----|

N/A X

b. Other Types of Recognition (PWTDs)	Yes	No	N/A X
---------------------------------------	-----	----	-------

DHS did not have any other types of recognition programs during FY 2019.

D. PROMOTIONS

1. Does your agency have a trigger involving PWDs 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 (PWDs) | | Yes | No |
| | N/A X | | |
| ii. Internal Selections (PWDs) | | Yes X | No |
| b. Grade GS-15 | | | |
| i. Qualified Internal Applicants (PWDs) | | Yes | No |
| | N/A X | | |
| ii. Internal Selections (PWDs) | | Yes | No X |
| c. Grade GS-14 | | | |
| i. Qualified Internal Applicants (PWDs) | Yes | No | N/A X |
| ii. Internal Selections (PWDs) | Yes | No | X |
| d. Grade GS-13 | | | |
| i. Qualified Internal Applicants (PWDs) | Yes | No | N/A X |
| ii. Internal Selections (PWDs) | Yes | No | X |

Aggregated relevant applicant pool data is not available at the Department level. Determination of relevant applicant pools should be considered at the Component level since positions and occupations are Component specific. An aggregation of relevant applicant pool data at the Department level would be less meaningful and potentially flawed.

Qualified Internal Applicants by Senior Grade:		Relevant Applicant Pool by Senior Grade:
SES:	2.31%	N/A
GS-15:	3.85%	N/A
GS-14:	4.22%	N/A
GS-13:	3.84%	N/A

A trigger was identified for selections of PWDs at the SES level when comparing the participation rate of selections to the percentage of qualified internal applicants by senior grade levels. PWDs exceeded participation at all other senior grades as identified below:

Selections by Senior Grade:		Qualified Internal Applicants by Senior Grade:
SES:	0.00%	2.31%
GS-15:	5.45%	3.85%
GS-14:	5.82%	4.22%
GS-13:	6.28%	3.84%

2. Does your agency have a trigger involving PWTDs (PWTDs) 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 (PWTDs)	Yes	No	N/A	X
ii. Internal Selections (PWTDs)	Yes	X	No	

b. Grade GS-15

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

c. Grade GS-14

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

d. Grade GS-13

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

Aggregated relevant applicant pool data is not available at the Department level. Determination of relevant applicant pools should be considered at the Component level since positions and occupations are Component specific. An aggregation of relevant applicant pool data at the Department level would be less meaningful and potentially flawed.

Qualified Internal Applicants by Senior Grade:		Relevant Applicant Pool by Senior Grade:	
SES:	0.58%		N/A
GS-15:	1.75%		N/A
GS-14:	1.57%		N/A
GS-13:	1.86%		N/A

Triggers were identified for selections of PWTDS at the SES, GS -15, and GS-14 levels when comparing the participation rate of selections to the percentage of qualified internal applicants by senior grade levels. PWDs exceeded participation at the GS-13 level as identified below:

	Selections by Senior Grade:	Qualified Internal Applicants by Senior
Grade:		
SES:	0.00%	0.58%
GS-15:	1.18%	1.75%
GS-14:	1.39%	1.57%
GS-13:	1.57%	1.86%

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWDs 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 (PWDs) | Yes | No X |
| b. New Hires to GS-15 (PWDs) | Yes | No X |
| c. New Hires to GS-14 (PWDs) | Yes | No X |
| d. New Hires to GS-13 (PWDs) | Yes | No X |

Based on a review of MD 715 B7-1 Senior Grade Level (New Hires), DHS did not have any triggers for new hires when compared to the qualified applicants in the senior grade levels SES through GS-13.

	Hires	Qualified Applicant Pool
New Hires to SES	7.69%	4.66%
New Hires to GS-15	13.77%	5.40%
New Hires to GS-14	11.41%	7.17%
New Hires to GS-13	14.06%	7.50%

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

Based on a review of MD 715 B7-1 Senior Grade Level (New Hires), DHS had triggers at the GS-15, GS-14, and GS-13 levels. No trigger was identified at the SES level, as the rate of hires exceeded the reported qualified applicant pool as provided below:

	Hires	Qualified Applicant Pool
New Hires to SES	2.56%	1.69%
New Hires to GS-15	1.45%	2.49%
New Hires to GS-14	1.71%	3.23%
New Hires to GS-13	1.86%	3.58%

6. Does your agency have a trigger involving PWTDs 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 (PWTDs) Yes No N/A X

ii. Internal Selections (PWTDs) Yes X

No

b. Managers

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

ii. Internal Selections (PWTDs) Yes X No

c. Supervisors

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

ii. Internal Selections (PWTDs) Yes X No

Due to the limited availability of applicant flow data and relevant applicant data, DHS is unable to identify the participation rates by disability distribution for qualified internal applicants. When reviewing the internal selections and comparing to the 2 percent goal as an alternative comparator, triggers were identified for promotions to all categories.

PWTDs Executive Selections:	1.40%	PWTDs Goal:	2%
PWTDs Manager Selections:	1.56%	PWTDs Goal:	2%
PWTDs Supervisor Selections:	1.08%	PWTDs Goal:	2%

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

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

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

Due to the limited availability of applicant flow data and relevant applicant data, DHS is unable to identify the participation rates by disability distribution for new hires. When reviewing the new hires and comparing to the 12 percent goal as an alternative comparator, a trigger was identified for Supervisors (First-Level Grade 12 and Below positions. No triggers were identified for Executives (SES – GS-15) and Managers (GS-13 – GS-14) positions.

PWDs Executive Selections:	18.28%	PWDs Regulatory Goal:	12.00%
PWDs Manager Selections:	30.47%	PWDs Regulatory Goal:	12.00%
PWDs Supervisor Selections:	9.11%	PWDs Regulatory Goal:	12.00%

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

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

Due to the limited availability of applicant flow data and relevant applicant data, DHS is unable to identify the participation rates by disability distribution for new hires. When reviewing the new hires and comparing to the 2 percent goal as an alternative comparator, triggers were identified for Managers (GS-13 – GS-14) and Supervisors (First-Level Grade 12 and Below) positions. PWTDs are exceeding the 2 percent goal in Executive Selections (GS-15 – SES).

PWTDs Executive Selections:	2.15%	PWTDs Regulatory Goal:	2.00%
PWTDs Manager Selections:	1.88%	PWTDs Regulatory Goal:	2.00%
PWTDs Supervisor Selections:	0.93%	PWTDs Regulatory Goal:	2.00%

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 2019, DHS converted a total of 159 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 59.77 percent conversion rate. Of those converted, 129 were converted non-competitively after two years of satisfactory service, 27 converted to career or career conditional before two years of service, and three were converted by other means. As a result of quarterly tracking and monitoring, DHS continued to experience incremental increases for the last three years.

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

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

Based on a review of MD-715 Table B1: Total Workforce (Employee Losses) - Distribution by Disability, PWDs are exceeding the inclusion rate benchmark for voluntary and involuntary separations.

Voluntary Separations	PWDs Inclusion Rate:	5.94%
Benchmark	IWODs Inclusion Rate:	5.61%
Involuntary Separations	PWDs Inclusion Rate:	3.13%
Benchmark	IWODs Inclusion Rate:	1.82%

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

- | | | | |
|------------------------------------|-----|---|----|
| a. Voluntary Separations (PWTDs) | Yes | X | No |
| b. Involuntary Separations (PWTDs) | Yes | X | No |

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	PWTDs Inclusion Rate:	7.60%	
Benchmark	IWODs Inclusion Rate:	5.61%	
Involuntary Separations	PWTDs Inclusion Rate:	2.97%	
Benchmark	IWODs Inclusion Rate:	1.82%	

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

During FY 2019, the Department Exit Survey program experienced a transitional period, involving coordination and consideration of both content and administration changes. TSA and USSS continued to maintain their separate Component-specific exit survey programs. Additional Components, including CBP and ICE, followed suit and transitioned separate exit surveys programs at the beginning of FY 2019. Components with separate exit survey programs, provide results with the Department for coordination and reporting purposes. Based on a consolidated review, aside from retirement, representing 226 respondents, the top reasons separating non-SES employees listed for leaving DHS were:

- Personal/Work-Life
- Management/Supervisor
- Advancement Opportunities

Based on available data from the DHS Exit Survey (not including TSA, USSS, CBP and ICE) the top three categories for employees self-reporting as an IWD, resulting in a total of 22 or 9.73 percent of respondents, the reasons for leaving differ slightly and include:

- Health-related reasons
- Personal or family-related
- Advancement opportunities/geographic location/and management/supervisor

Of the 22 respondents, excluding those who selected retirement as a primary factor for leaving, six self-reported as having a targeted disability. The primary reason, reported by two respondents, was also due to health-related reasons. The remaining respondents selected optional unique descriptions for leaving. DHS will continue to monitor these areas to identify any future trends.

To assist in monitoring trends and possible triggers, DHS recommends that along with its decentralized exit survey program efforts, each Component conduct an individualized assessment to identify any correlation to potential barriers for separating PWDs/PWTDs.

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.

The DHS public facing website (<https://www.dhs.gov/accessibility>) notice explains that if an individual believes that the information and communication technology (ICT) used by the Department of Homeland Security does not comply with Section 508 of the Rehabilitation Act, they may file a 508 complaint by contacting Accessibility@hq.dhs.gov.

Similarly, the DHS intranet site (<http://dhsconnect.dhs.gov/pages/accessibility.aspx>) provides the following statement:

Accessibility

The Department of Homeland Security is committed to providing accessible Information and Communication Technology (ICT) to individuals with disabilities, including members of the public and federal employees, by meeting or exceeding the requirements of Section 508 of the Rehabilitation Act of 1973. In addition, the Department is also committed to ensuring accessibility of our buildings and facilities as required by the Architectural Barriers Act, 42 U.S.C. 4151 through 4157.

Section 508 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794d)

Section 508 of the Rehabilitation Act of 1973, as amended requires agencies, during the procurement, development, maintenance, or use of ICT, to ensure that individuals with disabilities have access to and use of ICT information and data comparable to the access and use afforded to individuals without disabilities (i.e., "ICT accessibility"), unless an undue burden would be imposed on the agency. More information on Section 508 and the technical standards can be found at www.section508.gov.

If you have feedback, questions, or concerns relating to the accessibility of any content that interferes with your ability to access the information on the Department of Homeland Security's website, please contact [Website Issues](#) for assistance.

If you believe that the Information and Communication Technology (ICT) used by the Department of Homeland Security does not comply with Section 508 of the Rehabilitation Act, you may file a 508 complaint by contacting Accessibility@hq.dhs.gov.

To enable us to respond in a manner most helpful to you, please indicate the nature of your accessibility problem, the preferred format in which to receive the material, the web address (URL) of the material with which you are having difficulty, and your contact information.

Additional information regarding compliance with 508 requirements is available at the [DHS Office of Accessible Systems and Technology](#).

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

The DHS public facing website (<https://www.dhs.gov/accessibility>) notice explains that if an individual believes that a physical facility designed, built, altered, or leased with Federal funds by the Department of Homeland Security does not comply with the Architectural Barriers Act (ABA), refer to the US Access Board's website under [ABA Enforcement – File a Complaint](#).

Similarly, the DHS intranet site (<http://dhsconnect.dhs.gov/pages/accessibility.aspx>) provides the following statement:

[Architectural Barriers Act of 1968 \(42 U.S.C. § 4151--57\)](#)

The Architectural Barriers Act (ABA) requires access to facilities that are designed, built, altered, or leased with Federal funds. The Access Board is the federal agency responsible for enforcing the ABA. The Access Board's accessibility standards are available on their website at www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards, and information about filing a complaint may be found at www.access-board.gov/aba-enforcement/file-a-complaint.

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

During FY 2019, CRCL finalized the department-wide standard operating procedures for processing complaints of inaccessible ICT as required by Section 508 of the Rehabilitation Act. The new process and associated form are expected to be fully implemented by the end of 2020. This will also include coordination with the Paperwork Reduction Act process associated with the review and approval of the new DHS Section 508 Technology Accessibility Issue Report Form.

C. REASONABLE ACCOMMODATION PROGRAM

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

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

During FY 2019, the overall average time frame for processing initial requests for reasonable accommodations was approximately 37.30 days (does not include average processing days for USCIS and FEMA).

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

CBP: 46.6 Days

USCIS: *Unavailable – see Component report*

HQ: 54 Days

FEMA: *Unavailable – see Component report*

ICE: 66.95 Days

TSA: 45 Days

USCG: 23.13 Days

USSS: 6 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 2019 was thirty-seven (37.30) days, reducing the average processing days by two. Note: The average number of processing days does not include USCIS and FEMA since their data was unavailable at the time of reporting.

During FY 2019, all DHS Components continued to provide reasonable accommodation training to managers and supervisors regularly. Consistent with the new requirements outline in EEOC's Final Rule implementing revisions to 29 C.F.R 1614. § 1614.203(d)(5), DHS and its Components have been developing and implementing revised reasonable accommodation and personal assistance service procedures.

In support of DHS's reasonable accommodation program, CRCL and Component level subject matter experts continue to collaborate with OAST on the development and overall architectural design of an enhanced Accessibility Compliance Management System, to monitor trends and to manage, track and report on all reasonable accommodation requests, including requests for PAS. DHS initially deployed the new system during FY 2019. As a result, coordinated efforts continue to address unexpected system issues and enhancements. The new system will have a built-in reporting capability to produce all reporting and record keeping requirements consistent with 29 C.F.R 1614. § 1614.203(d)(5) and Executive Order 13164.

In observance of the 29th Anniversary of the Americans with Disabilities Act of 1990 (ADA), CRCL hosted a day long training session on "Answering ADA Workplace Questions." Over sixty managers, Human Capital and EEO professionals from all Components were invited and attended the instructive training focusing on practical tips, case law review, and checklists for effectively managing reasonable accommodation requests. This training was delivered by the Director of ADA Services, with the National Employment Law Institute.

DHS developed the *Employment of People with Disabilities: Roadmap to Success* training in 2008, updated the materials in 2012, and more recently during FY 2017, to include the provision of the final rule implementing 29 C.F.R 1614. § 1614.203(d)(5). All supervisors, hiring officials and human capital professionals are required to complete the training within sixty (60) days of onboarding and every two years after appointment. All Components use the DHS training module. CRCL conducted efforts during FY 2019 and explored available options and resources to revise the training module during 2020. Coordination of updated training materials will be conducted and led by CRCL as a Department-wide effort with a goal of implementation by FY 2021.

CRCL continued efforts to implement revised reasonable accommodation procedures to incorporate the provision of personal assistant services as an affirmative action obligation. The revised procedures are in the official DHS Directives System review process with a completion of the review and implementation expected by mid-year FY 2020.

Finally, DHS continues to partner with the Department of Defense (DoD), Computer/Electronic Accommodation Program (CAP) and the Job Accommodation Network to provide assistive technology accommodation solutions and expert consulting on disability accommodation solutions. During FY 2019, CAP provided 368 accommodations to 134 employees and conducted needs assessments for 34 employees, totaling \$120,394.30 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 the provision of PAS. The initial draft was submitted to EEOC via the raprocedures@eeoc.gov mailbox on September 28, 2018, for review as required. DHS received feedback from the EEOC and incorporated recommendations. The revised procedures are in the official DHS Directives System review process with a completion of the review and implementation expected by mid-year FY 2020.

Section VI: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWDs 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 2019, DHS had a lower percentage of PWDs who filed a formal EEO Complaint (16.2 percent) alleging harassment, as compared to the government-wide average of 19.69 percent. In FY 2019, DHS had 39 settlement agreements and one finding alleging harassment, hostile work environment based on disability. A summary of the corrective measures taken are as follows:

Finding # 1:

1. Post notice for 180 consecutive days.
2. Conduct EEO training on the Rehabilitation Act of 1973 for all managers/supervisors.
3. Back pay.
4. Provide the opportunity to submit a request for attorney's fees.
5. Compensatory damages.
6. Revision of agency policies.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWDs 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 2019, DHS had a lower percentage of PWDs who filed a formal EEO Complaint (9.50 percent) alleging failure to provide a reasonable accommodation compared to the government-wide average of 13.53 percent.

DHS had 28 settlement agreements, a reduction of 20 agreements compared to FY 2018, and three findings alleging failure to provide a reasonable accommodation based on disability during FY 2019. 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.
5. Conduct research for a reassignment for which complainant qualifies.

Finding #2:

1. Conduct two hours of EEO training.
2. Consider disciplinary action against the supervisor.
3. Provide the opportunity to submit a request for compensatory damages and attorney fees.
4. Post notice for 60 consecutive days.

Finding #3:

1. Conduct eight hours of EEO training
2. Consider disciplinary action against the supervisor.
3. Provide the opportunity to submit a request for compensatory damages and attorney fees.
4. Post notice for 60 consecutive days.

Section VII: Identification and Removal of Barriers

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

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWDs and/or PWTDs?
 Yes No
2. Has the agency established a plan to correct the barrier(s) involving PWDs and/or PWTDs?
 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:

Trigger 1	Lower than expected participation for individuals with disability (PWD) and targeted disabilities (PWTDs) when compared to the regulatory goals of 12 percent for PWD and 2 percent for PWTD in grade clusters GS-1 – GS-10 and GS-11 – SES.	
Barrier(s)	Not Identified	
Objective(s)	Increase workforce participation rates of PWDs and PWTDs 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	<p>FY 2019 Update: B1 – Total Permanent Workforce (2.0 version) DHS experienced an increase of 1,479 employees from FY 2018 to FY 2019 for PWDs, representing 11.01 percent, a ratio increase of 0.55 percent, the highest of every group. PWTDs experienced a slight increase of 17 employees, however overall ratio decrease of -0.02 percent.</p> <p>Separation rates did not experience any significant changes. PWDs separated at a rate of 11.87 percent slightly above FY 2018, and PWTDs separated at the same rate of 1.58 percent as they did in FY 2018.</p> <p>----- FY 2018: B1 – Total Permanent Workforce: PWDs 10.46 percent below 12 percent Goal; Total Permanent Workforce PWTD 1.28 percent.</p> <p>B14 – Separations by Disability: PWDs Separating at rates (11.67 percent) higher than expected PWTDs Separating at rates (1.58 percent) higher than expected</p>

Complaint Data (Trends)	Yes	<p>FY 2019 Update: See below Findings and Decisions.</p> <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 percent.</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 percent.</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 percent of all complaints to 12.54 percent 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 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 experienced a significant increase from eight 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>FY19 462 Report Update – DHS had an overall decrease in the total number of settlements based on harassment when compared to FY 2018, from 63 to 39 during FY 2019. The number of findings remained unchanged with one finding in FY 2019.</p> <p>Similarly, the number of settlements based on failure to accommodate also decreased significantly, from 48 in FY 2018 to 28 during FY 2019. The number of findings</p>

		<p>increased by one, from two in FY 2018 to three in FY 2019.</p> <p>DHS continues to remain under the government-wide average for both types of complaints filed by PWDs.</p> <p>462 Report FY18 – 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)	No	
Exit Interview Data	Yes	<p>FY19 Update DHS Exit Survey – DHS (excludes TSA, USSS, CBP and ICE) Due to transition changes further decentralizing exit survey procedures, the department is recommending that Components continue to conduct individualized assessments to monitor trends. Based on data available, there was a slight deviation in the top three primary reasons for IWODs separating DHS, resulting in: 1. Health Reasons; 2. Personal or Family Related; and 3. Advancement Opportunities/Geographic Location/ and Supervisor/Management, all coming in 3rd. With the addition of “health reasons” for both groups, PWDs and PWTDs, DHS will continue to monitor, but suspects that it directly correlates to the high percentage of positions with medical and physical requirements.</p> <p>DHS Exit Survey (excludes TSA and USSS) 14.28 percent of respondents indicated they had a disability. Of these respondents the top three reasons for leaving include: Supervision/Management – 11.63 percent Advancement Opportunities – 11.63 percent Personal/Family Related – 8.84 percent The top reasons mentioned above are the same as PWODs (IWODs). When comparing leaving based on health-related reasons, PWDs (PWDs) indicated health-related reasons as the primary reason 5.58 percent of the time compared to 1.82 percent for IWODs.</p>

		<p>Further review revealed a 4.18 percent response rate for employees indicating they had a targeted disability.</p> <p>Of the respondents who indicated they had a targeted disability, the top three reasons for leaving included:</p> <p>Advancement Opportunities – 11.11 percent</p> <p>Supervision/Management –11.11 percent</p> <p>Geographic Location and Salary Pay (tied) – 9.52 percent</p> <p>Health-related reasons were indicated by 6.35 percent of the PWTDS respondents.</p>
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	Yes	<p>FY 2019 Update - Utilization Analysis by Grade Cluster (Perm)</p> <p>DHS experienced an increase in both the GS-1- GS-10 and GS-11-SES Grade Clusters for PWDs as follows:</p> <p>PWDs Grade Cluster 1-10 8.99 percent (below 12 percent)</p> <p>PWDs Grade Cluster 11-SES 12.27 percent (above the 12 percent goal)</p> <p>Slight decreases were reported for PWTDS in both the GS-1- GS-10 and GS-11-SES PWTDS Grade Cluster 1-10 1.26 percent (below 2 percent)</p> <p>PWTDS Grade Cluster 11 – SES 1.26 percent (below 2 percent)</p> <p>-----</p> <p>Utilization Analysis by Grade Cluster (Perm)</p> <p>PWDs Grade Cluster 1-10 8.73 percent (below 12 percent)</p> <p>PWDs Grade Cluster 11-SES 11.55 percent (slightly below 12 percent)</p> <p>PWTDS Grade Cluster 1-10 1.29 percent (below 2 percent)</p> <p>PWTDS Grade Cluster 11 – SES 1.27 percent (below 2 percent)</p>

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 PWDs and PWTDs 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 29 C.F.R 1614. § 1614.203(d)(5).	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	4/18/2019
09/30/2018	Revise Reasonable Accommodation procedures to include procedures for providing Personal Assistance Services.	Yes	06/30/2020	
09/30/2018	Develop and post notice of rights for employees and applicants under Section 508 of the Rehabilitation Act and the Architectural Barriers Act on the internal and external websites.	Yes		09/30/2018
03/30/2018	Implement and post Affirmative Action plan for Individuals with Disabilities to the DHS website internally and externally.	Yes	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	2/20/2020	
04/01/2019	Develop a bi-annual report to monitor Components progress toward increasing participation of PWDs and PWTDs within Mission Critical Occupations.	Yes	6/30/2020	
Fiscal Year	Accomplishments			
2017	N/A - Newly established.			
2018	Hiring Goals:			

During FY 2018, DHS set a 12 percent hiring goal for Persons with Disabilities (PWDs) at all grade levels; a 2 percent hiring goal for Persons with Targeted Disabilities (PWTDs) at all grade levels, excluding law enforcement and transportation security officer occupations; and a 1.5 percent hiring goal for Schedule A hires excluding law enforcement and transportation security officer occupations.

As a result of these goals, 10.4 percent of new hires were PWDs and 1.7 percent were PWTDs in non-law enforcement and non-TSO positions. While the Department did not meet the new hire goals listed above in these two areas, it should be noted that DHS ended FY 2018 with PWDs representing 10.5 percent of the total workforce and PWTDs representing 2.4 percent, both increases from FY 2017 (9.9 percent and 2.1 percent, respectively). In addition, Schedule A hires constituted 1.6 percent of all new hires in non-law enforcement related and non-TSO positions, exceeding the goal and increasing by 35 percent from FY 2017.

To support and expand DHS's outreach and recruitment, SRDI, in coordination with CRCL, began compiling a listserv of all disability organizations that will be maintained and distributed on an annual basis to all DHS Components. The listserv will be finalized in FY 2019 for distribution and will include disability organizations such as America Job Centers, Veteran's Vocational Rehabilitation and Employment Program, Centers for Independent Living and Employment Network providers.

Disability Training:

The Roadmap to Success training was updated during FY 2017 and FY 2018 to include the provision of amended 29 C.F.R 1614. § 1614.203(d)(5), as well as other necessary revisions and updated resources. DHS plans to revise this training course by FY 2020.

Mid-Year Reporting Requirements:

CRCL issued a revised mid-year reporting requirement to all DHS Components to assist with monitoring and tracking progress in establishing a Model EEO Program. The revised reporting format was modeled after the revised Part G Agency Self-Assessment, essential element program measures and trigger identification based on Part J Special Program Plan for the Recruitment, Hiring, Advancement and Retention of Persons with Disabilities. CRCL reviewed and combined all Component responses then reported on EEO programs in a composite document providing additional technical guidance where necessary.

Revise DHS Standard Language on All Vacancy Announcements:

CRCL initiated coordination efforts with OCHCO Policy and Programs with the recommendation of adding standard language to vacancy announcements to encourage persons with disabilities to apply. During FY 2018, DHS updated template language that is still under review by OPM. DHS CRCL in

	<p>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: 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. During FY 2018, DHS updated its web page, e.g., internal connect page (http://dhsconnect.dhs.gov/pages/accessibility.aspx), for both accessibility and consistency to include a description of rights and how to file a complaint under Section 508.</p> <p>Implement and post FY 2017 Affirmative Action Report and FY 2018 Plan As required, DHS posted its FY 2017 Affirmative Action Report and FY 2018 Plan on DHS' public facing website at the following location: www.dhs.gov/reports-office-civil-rights-and-civil-liberties. CRCL continues to collaborate with OCHCO and DHS Components to ensure effective implementation on a regular basis.</p>
2019	<p>Disability Training: DHS continued its efforts to redevelop and expand its <i>DHS Roadmap to Success</i> training module. Modifications to the training include recent changes in disability employment law, Section 508 compliance and the addition of Personal Assistance Services as a regulatory requirement in Title 29, Part 1614. CRCL developed and submitted a statement of objectives to support a request for proposal to OPM's USALearning office. Based on the feedback received from OPM including the total estimated cost to redesign the training, CRCL decided to explore other options. As a result, CRCL consulted with OCHCO's Strategic Learning Development and Engagement's (SLDE) Learning Technology and Innovation (LTI) Division. DHS is certain that the services provided in-house by the SLDE-LTI will support CRCL's training development and implementation needs. The goal remains to deploy the revised <i>DHS Roadmap to Success</i> module before the end of FY 2020 with a roll-out in early FY 2021.</p>

Revise DHS Standard Language on All Vacancy Announcements:

As recommended by CRCL, in an alert, guidance to the DHS Human Capital Leadership Council (including all Component Chief Human Capital Officers and others) was issued on April 18, 2019, regarding updated “mandatory language for Job Opportunity Announcements – Disability Recruitment.” The alert provided the required language that should be included in all competitive and excepted service job opportunity announcements. Specifically, the language encourages persons with disabilities to apply. This activity is closed.

Revise Reasonable Accommodation and Personal Assistance Services Procedures:

In furtherance of DHS efforts to implement approved revised reasonable accommodation procedures to include procedures for processing personal assistance services consistent with the new obligations outlined in amended 29 C.F.R 1614. § 1614.203(d)(5), CRCL continued to coordinate reviews during FY 2019. The Department’s draft revision to Instruction Number 259-01-001, which implements DHS procedures for facilitating reasonable accommodation and personal assistant service requests is currently in the official DHS Directives System review process. CRCL has also conducted reviews of Component-level revised procedures and provided edits and comments prior to submission to EEOC for approval. As a result, DHS (Departmental), U.S. Coast Guard, the Transportation Security Administration, and U.S. Secret Service, Federal Law Enforcement Training Center, and U.S. Citizenship and Immigration Service have all submitted either draft or final revised procedures to EEOC for review and approval pursuant to Executive Order 13164, during the reporting period. CRCL will continue to monitor and track the status and progress with the remaining Components in meeting this requirement. DHS’s procedures require all updated reasonable accommodation procedures to be submitted to CRCL for review prior to submission to EEOC.

Develop a bi-annual Mission Critical Occupations report to monitor participation of PWDs and PWTDs:

The revised 2.0 data tables now include a detailed report of participation rates by ERI/G and Disability (A/B-6) for MCOs that will serve as our framework for continued analysis and monitoring. DHS will use a similar format to mirror the 2.0 data table format (excluding the applicant flow data) to continue its efforts in monitoring DHS Priority MCOs during FY 2020 and beyond on a bi-annual basis. This report will be shared with Components as a resource and sample framework to support Component level monitoring efforts.

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 continue to focus on the completion of the planned activities outlined above.

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	<p>FY 2019 Update: B9-1 (2.0) Employee Recognition and Awards Distribution by Disability - Employees with disabilities (PWDs/PWTDs) continue to receive awards at rates comparable or above to their workforce participation rates in all categories except in the following new categories: Cash Awards \$3,000 - \$3,999, \$4,000 - \$4,999, \$5,000 or more and Quality Step Increase. Upon further review, both groups (PWDs/PWTDs) are receiving awards at lower rates than expected when using the inclusion rate as a benchmark, see Section IV, C. Awards for detailed summary.</p> <p>----- B13 Employee Recognition and Awards by Disability – Employees with disabilities (PWDs) 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.</p>
Complaint Data (Trends)	Yes	<p>FY 2019 – no update.</p> <p>462 Report– DHS reported four out of 19 complaints were filed and two out of four settlements were based on disability and awards during FY 2018.</p>
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment)	Yes	DHS had no findings of disability discrimination based on awards.

Processes)		
Climate Assessment Survey (e.g., FEVS)	Yes	<p>FY 2019 Update: Upon review of the FY 2019 FEVS, DHS has seen positive progress. FY 2019 data reveals the largest variance between PWDs (56.3 percent positive, up from 53.9 percent in FY 2018) and IWODs (65.4 percent positive, up from 63.7 percent in FY 2018) is -9.1 percent (down from -9.7 percent in FY 2018), for Question 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 -0.70 percent variance (was -2 percent variance in FY 2018) for PWDs (39.7 percent positive, up from 37.2 percent in FY 2018) compared to IWODs (40.40 percent positive, up from 39.2 percent in FY 2018) for Question 25 – Awards in my work unit depend on how well employees perform their jobs.</p> <p>-----</p> <p>Upon review of the FY 2018 FEVS, the largest variance between PWDs (53.9 percent positive) and IWODs (63.7 percent) is -9.7 percent, for Question 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 percent variance for PWDs (37.2 percent positive) compared to IWODs (39.2 percent positive) for Q 25 – Awards in my work unit depend on how well employees perform their jobs.</p>
Exit Interview Data	Yes	Upon review of the Exit Survey, the reason for leaving associated with “bonus” was reported by 18 employees or 1.20 percent 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,	No	

OPM)				
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	09/30/2020	
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 indicated 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>			
FY 2019	<p>The DHS Directives Instruction Manual describes the processes, procedures and requirements for preparing, reviewing, approving and issuing Directives (policies) and Instructions (procedures). The Manual also provides guidance on other implementing documents, such as manuals, guides, handbooks, reference books, standard operating procedures (SOPs), through the Department of Homeland Security (DHS) Directives System, as defined in DHS Directive 112-01. It also outlines the process by which Directives, Instructions, and/or other Implementing Documents issued under the Directives System are reviewed within two years, to determine if the Directive or Instruction should be (1) Revised; (2) Consolidated; (3) Canceled; or (4) Certified Current (no changes are required and reissued as is with a "current as of" date listed). The Directives Manager is responsible for affirmatively indicating to the DHS Directives Manager what appropriate action is necessary to maintain the Directive or Instruction upon receipt of the notice from the DHS Directives Manager, which is coordinated every two-years.</p> <p>Based on this outlining procedure, all policies and procedures identified are reviewed every two years by the Office of the Chief Human Capital Officer. To date, no potential barriers have been identified.</p> <p>CRCL will continue to coordinate and collaborate with OCHCO on a regular basis to propose recommendations to ensure perceived or actual barriers that may be caused by DHS award policies or associated procedures are addressed.</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).

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 09/30/2020.

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 PWDs and PWTDs 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			
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	09/30/2020	
Fiscal Year	Accomplishments			
FY 2018	<p>CRCL and OCHCO will work with OPM and Monster Government Solutions to modify data collection and reporting capabilities to match MD-715 data reporting requirements.</p> <p>CRCL participates in monthly calls with OPM regarding applicant flow data and continues to work with OCHCO IT to integrate applicant flow data from OPM and Monster Government Solutions into a central data warehouse. Until the data flows to the central data warehouse, CRCL will continue to extract applicant flow data from OPM's USASTaffing system and obtain data directly or via data calls for DHS Components that use Monster Government Solutions.</p> <p>Coordinate with OCHCO to develop AFD framework for the SES Career Development Program, Pathways Program, and mentoring programs at the DHS level.</p>			

	<p>In FY 2018, DHS reported participation and applicant flow counts and percentages for the SES Career Development Program, which is the only program managed at the Department level that leads to promotion without further competition. The SES Career Development Program was announced in USAJobs. USAStaffing was used to track applications, qualification, referral, and selection. The Department was able to obtain full applicant flow data for the SES CDP cohort announced in FY 2018. The SES CDP program staff provided data on participants.</p> <p>DHS will identify qualifying career development programs throughout the Department and the courses that support those programs. Using data from our talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes, DHS will produce a report that complies with MD-715.</p> <p>DHS achieved full operational capability for PALMS at six of the nine DHS Components, in August 2017. OCHCO exempted FEMA, TSA, and USCG from adopting PALMS. In FY 2019, DHS plans to identify the solution set for follow-on capability, including reporting capability, such as that required for MD-715.</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 with diversity data added when feasible. Until the diversity data is available directly from PALMS and the central data warehouse, CRCL will continue to work with OCHCO to extract and manually determine the diversity status of developmental program participants.</p>
FY 2019	<p>Develop AFD framework for the SES Career Development Program, Pathways Program, and mentoring program.</p> <p>During FY 2019, CRCL was able to acquire applicant flow data for both the SES Career Development Program and the newly established DHS Women in Law Enforcement Mentoring Program and will continue to monitor. Efforts to identify a process for acquiring and analyzing DHS Pathways Program AFD are still in progress. AFD for these programs are now available for review on data tables B7 and B8.</p>

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.

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	Quarterly Conversion Ad-hoc reports		
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 MD 715 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	

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 guidance.	Yes	09/30/2020	
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 two years of service, and four were converted by other means. Overall DHS experienced an increase in conversions when compared to 101, or 53 percent during FY 2017.</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 C.F.R. § 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 the review process.</p>			

FY19	<p>During FY 2019, DHS converted a total of 159 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 55.28 percent conversion rate. Of those converted, 129 were converted non-competitively after two years of satisfactory service, 27 converted to career or career conditional before two years of service, and three were converted by other means. Overall, DHS experienced an increase in conversions when compared to the 157 during FY 2018. In support of this effort, CRCL continues to monitor Schedule A conversions on a quarterly basis and shares Component-level reports for appropriate action. The reports provide a summary review of Schedule A employees by:</p> <ul style="list-style-type: none"> • Total Schedule A Workforce • 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 (but was eligible at some point in the given year) • Not Eligible for Conversion <p>Coordinate efforts with OCHCO to develop DHS Schedule guidance. Modified planned activity description to change efforts from developing policy and procedures to developing Schedule A guidance and to update target date for completion until 9/30/2020. CRCL and OCHCO are continuing these efforts to implement guidance with sound strategies and best practices for utilizing the Schedule A appointment authority for employment, retention, and career development opportunities. DHS plans to socialize and implement the final guidance by 2021.</p> <p>In support of this effort, CRCL developed a DHS Schedule A Factsheet. The factsheet is a high-level overview of the Schedule A Hiring Authority and provides prospective candidates with disabilities with an overview on applying for positions within DHS utilizing Schedule A, as well as a list of DHS Selective Placement Program Coordinators.</p> <p>Additionally, during FY 2019, DHS hosted a webinar on recruiting and hiring individuals with disabilities and targeted disabilities on Tuesday, July 30, 2019. Over 30 supervisors, hiring managers, recruiters, and human resources specialists participated to increase awareness of this topic. A post-webinar survey indicated 81 percent of the participants said they increased knowledge of Schedule A direct hiring authority from (34 percent prior to the webinar) and 58 percent of participants indicated they increased knowledge of the Bender program (17 percent prior to the webinar).</p>
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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.

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 09/30/2020.

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	<p>FY 2019 Update: B1: Total Workforce Distribution by Disability/ Employee Loses indicates a slight increase when compared to FY18, representing 11.87 percent in FY 2019. PWTDs separated at a rate of 1.58 percent, which represents no change compared to FY 2018.</p> <p>When comparing separation rates by the inclusion benchmarks, both groups are exceeding the rates of IWODs for both voluntary and involuntary separations.</p> <p>-----</p> <p>B14 - Employees with disabilities separation rate of 11.7 percent is higher than their overall workforce participation rate of 10.5 percent. Employees with disabilities experienced a 0.6 percent increase when compared to FY 2017.</p>
Complaint Data (Trends)	Yes	<p>FY 2019 Update: 462 – (Part IV) Bases and Issues Alleged in Complaints Filed: Increase from 118 in FY 2018 to 141 in FY 2019 in total number of complaints alleging failure to accommodate resulting in a ratio change of 19.49 percent.</p> <p>There was also a slight increase from 223 in FY 2018 to 233 in FY 2019 in total number of complaints alleging harassment based on disability resulting in a ratio change of 4.48 percent.</p> <p>DHS also continues to monitor complaint activity by issue for “medical examinations,” which continues to have an upward trend resulting in an increase of five from 33 in FY 2018 to 38 in FY 2019.</p> <p>No FEAR Act – No update. DHS will continue to review every two years.</p> <p>-----</p> <p>462 – (Part IV) Bases and Issues Alleged in Complaints Filed: Slight</p>

		<p>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 percent.</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 percent.</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 percent of all complaints to 12.54 percent 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 bases, 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 experienced a significant increase from eight in FY 2013 to 33 in FY 2018.</p>																												
Grievance Data (Trends)	No																													
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No																													
Climate Assessment Survey (e.g., FEVS)	Yes	<p>FY 2019 Update: DHS reported 11.5 percent were respondents who reported to have a disability during the 2019 FEVS (less than the 12 percent goal of PWDs).</p> <p>Further review of three questions used in the Best Places to Work report based on the FY 2019 FEVS, indicates an employee’s intent to remain with an agency, reveals PWDs responded more favorably to two of the questions 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-PWDs</th> <th>PWDs</th> <th>Diff</th> </tr> </thead> <tbody> <tr> <td>Q. 40</td> <td>I recommend my organization as a good place to work.</td> <td>67.2%</td> <td>56.3%</td> <td>56.3%</td> <td>56.8%</td> <td>0.5%</td> </tr> <tr> <td>Q. 69</td> <td>Considering everything, how satisfied are you with your job?</td> <td>68.9%</td> <td>60.6%</td> <td>60.8%</td> <td>59.1%</td> <td>-1.7%</td> </tr> <tr> <td>Q. 71</td> <td>Considering everything, how satisfied are you with your organization?</td> <td>61.4%</td> <td>51.3%</td> <td>51.3%</td> <td>51.4%</td> <td>0.1%</td> </tr> </tbody> </table>	Item	Item Text	Gov	DHS	Non-PWDs	PWDs	Diff	Q. 40	I recommend my organization as a good place to work.	67.2%	56.3%	56.3%	56.8%	0.5%	Q. 69	Considering everything, how satisfied are you with your job?	68.9%	60.6%	60.8%	59.1%	-1.7%	Q. 71	Considering everything, how satisfied are you with your organization?	61.4%	51.3%	51.3%	51.4%	0.1%
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		<p>-----</p> <p>DHS reported 8,648 out of 68,780 or 12.57 percent were respondents who reported to have a disability during the 2018 FEVS (more than the 12 percent goal of PWDs).</p> <p>The largest variance between PWDs (53.9 percent positive) and persons without disabilities (63.7 percent) is -9.7 percent, 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 (Q. 68) had the second highest variance of -6.5 percent, and Opportunity to demonstrate leadership skills (Q. 43) had the third highest variance of -6.1 percent 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 percent) 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-PWDs</th> <th>PWDs</th> <th>Diff</th> </tr> </thead> <tbody> <tr> <td>Q. 40</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>Q. 69</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>Q. 71</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-PWDs	PWDs	Diff	Q. 40	I recommend my organization as a good place to work.	66.3%	56.3%	56.9%	54.8%	-2.1%	Q. 69	Considering everything, how satisfied are you with your job?	68.3%	60.4%	61.1%	58.0%	-3.1%	Q. 71	Considering everything, how satisfied are you with your organization?	60.4%	50.6%	51.2%	50.1%	-1.0%
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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																																	
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	1/30/2021	
01/30/2018	Monitor separations on a quarterly basis by disability distribution.	Yes		10/16/2018
06/30/2018	Collaborate with OCHCO to explore the feasibility of implementing new retention programs specifically for PWDs and PWTDS.	Yes	09/30/2020	
09/14/2018	Conduct study on reasonable accommodation requests and procedures for delayed and denied accommodations to identify potential correlations to high separations.	Yes	09/30/2020	
Fiscal Year	Accomplishments			
	<p>Upon review PWDs continue to separate voluntarily and involuntarily at a higher rate when compared to employees without disabilities. The overall percentage of separations for PWDs increased from 10.05 percent in FY 2017 to 11.67 percent in FY 2018. Similarly, PWTDS experienced an increase for involuntary separations from 1.36 percent in FY 2017 to 2.11 percent in FY 2018, while voluntary separations for PWTDS decreased from 1.62 percent in FY 2017 to 1.51 percent in FY 2018.</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 14.2 percent of the respondents reported having 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 were the same for respondents without disabilities, including:</p> <p>Supervision/Management – 11.63 percent Advancement Opportunities – 11.63 percent Personal/Family Related – 8.84 percent</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 percent of the time compared to 1.82 percent for respondents without disabilities.</p> <p>In September 2018, DHS OCHCO convened an exit survey working group due to the low participation rates overall. The working group led by the DHS Engagement Team Lead, Chief Learning and Engagement Office, OCHCO consists of representatives from all DHS Components including representatives from CRCL. The initial goal of the working group was to review current DHS Exit Survey and Component Exit Surveys and provide recommended changes to the DHS</p>			

	<p>survey that will improve participation and usefulness of data. The working group was tasked to also review off-boarding practices related to the exit survey in order to determine best practices for improving participation. CRCL representatives will ensure consideration of disability-related questions and seek their inclusion in the final submission of established core questions. The working group plans to achieve the goals outlined above and begin implementation by April 2019.</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 including 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 PWDs and PWTDs. CRCL through coordinated efforts with OCHCO/SRDI will continue to identify strategies for increasing participation of employees with disabilities in existing DHS mentoring programs and career development programs. During FY 2018, CRCL requested that all Components advertise and encourage individuals with disabilities to consider applying to the DHS Headquarters Mentoring program and all other career development programs already in place throughout the Department to support our affirmative employment obligations.</p>																																																
FY 2019	<p>Review and analyze exit surveys to identify barriers to retention. Modified target date due to the transitional period being in FY 2019. As a result, two additional Components have implemented Component specific exit surveys, further decentralizing the exit survey program within DHS. Additional efforts during FY 2019 included adding three additional disability-related questions to the DHS Survey. The same questions were shared with those Components who administer their own exit surveys. As part of the coordinated efforts with CRCL and OCHCO, questions now include:</p> <p>1. DHS proactively supports efforts to improve the recruitment, hiring, advancement, and retention of individuals with disabilities. <i>Matrix scale:</i></p> <table border="1" data-bbox="509 1304 1330 1535"> <thead> <tr> <th></th> <th><i>Strongly Disagree</i></th> <th><i>Disagree</i></th> <th><i>Neither Agree or Disagree</i></th> <th><i>Agree</i></th> <th><i>Strongly Agree</i></th> </tr> </thead> <tbody> <tr> <td><i>Recruitment</i></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td><i>Hiring</i></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td><i>Advancement</i></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td><i>Retention</i></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p><i>Followed by an optional open-ended comment box</i></p> <p>2. DHS takes appropriate steps to ensure accessibility (technology and facility) requirements are met for qualified individuals with disabilities. <i>Matrix scale:</i></p> <table border="1" data-bbox="509 1688 1330 1850"> <thead> <tr> <th></th> <th><i>Strongly Disagree</i></th> <th><i>Disagree</i></th> <th><i>Neither Agree or Disagree</i></th> <th><i>Agree</i></th> <th><i>Strongly Agree</i></th> </tr> </thead> <tbody> <tr> <td><i>Technology</i></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td><i>Facility</i></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p><i>Followed by an optional open-ended comment box</i></p>		<i>Strongly Disagree</i>	<i>Disagree</i>	<i>Neither Agree or Disagree</i>	<i>Agree</i>	<i>Strongly Agree</i>	<i>Recruitment</i>						<i>Hiring</i>						<i>Advancement</i>						<i>Retention</i>							<i>Strongly Disagree</i>	<i>Disagree</i>	<i>Neither Agree or Disagree</i>	<i>Agree</i>	<i>Strongly Agree</i>	<i>Technology</i>						<i>Facility</i>					
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	3. DHS takes appropriate steps to ensure reasonable accommodation and/or Personal Assistance Services are provided to qualified individuals with disabilities.					
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<p>Explore feasibility of implementing new retention programs specifically for PWDs and PWTDs.</p> <p>CRCL developed a plan to implement a DHS Disability Mentoring Program. Current plans are to implement a six-month program pilot during FY 2020, that will be modeled upon the CRCL DHS Women in Law Enforcement Mentoring Program launched in 2019.</p> <p>CRCL continues to promote the DHS Headquarters Mentoring program and all other career development programs including the recently launched Supervisory Leadership Bridges Self Development Program, which is open to employees with a minimum of one-year employment in DHS and who are in the GS-11 – GS-13 grade levels in the 1801, 1811, 0132, 0301, 0343, and 2210 occupational series. This program is an innovative approach to providing employees across the Department with a flexible developmental path that targets important aspects of supervisory leadership. This program addresses a curated set of essential leadership competencies and integrates virtual learning resources and experiential developmental activities to support affirmative employment obligations.</p>						

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.

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.

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