



U.S. Department of Homeland Security

EEOC MANAGEMENT DIRECTIVE 715

Equal Employment Opportunity Program Status Report

Fiscal Year 2020



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	Alejandro N. Mayorkas	Secretary
Head of Agency Designee	Katherine Culliton-González	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	Vacant – Multiple Acting	Director, Complaints Management and Adjudication Section (CMAS), CRCL	0260	GS-15		Vacant
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 ¹	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

¹ Including Cybersecurity and Infrastructure Security Agency (CISA)

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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 2020 (FY 2020) 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 employees and applicants for employment. The report also provides the FY 2021 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) Secure 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 decreased slightly from 94.3 percent in FY 2019 to 94.0 percent in FY 2020. The decrease in compliance is spread across Components and measures and does not indicate a specific area of increased non-compliance.

The scorecard below shows the percentage of measures met for each of the essential elements by DHS Components during FY 2019 and FY 2020. The percentages also include those measures reported at the Department level.

Model EEO Program Scorecard		
	FY 2019 % Met	FY 2020 % Met
Essential Element A: Demonstrated Commitment from Agency Leadership	95.3%	96.9%
Essential Element B: Integration of EEO into the Agency's Strategic Mission	92.6%	91.1%
Essential Element C: Management and Program Accountability	91.7%	90.7%
Essential Element D: Proactive Prevention of Unlawful Discrimination	89.8%	89.0%
Essential Element E: Efficiency	96.1%	96.1%
Essential Element F: Responsiveness and Legal Compliance	100.0%	100.0%
Total	94.3%	94.0%

Notes: 156 measures starting in FY 2018. Draft data for all nine DHS Components was available for reporting.

Highlights of the Department's FY 2020 accomplishments in each essential element follow.

Essential Element A – Demonstrated Commitment from Agency Leadership

- In January 2020, to coincide with National Mentoring Month, the second cohort of the DHS Women in Law Enforcement (WLE) Mentoring Program was deployed. This program was developed and implemented to utilize mentoring as a valuable career development tool and networking opportunity. The program, created for DHS women law enforcement officers (LEOs), is and remains the first of its kind in the Federal government. In the second cohort, the 25 mentee participants 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 Protective Service (FPS), and the U.S. Secret Service (USSS). The 23 mentors² included retired and current law enforcement officers from DHS, the U.S. Coast Guard, and the Department of Justice. Due to the coronavirus pandemic, the six-month program was extended to afford the participants the opportunity to maximize the mentoring experience. The program included mid-cycle and final program evaluations.

The second cohort, like the inaugural, offered presentations on professional development and personal growth. In the second cohort, program participants received information on the Department-sponsored Supervisory Leadership Bridges Development Program and Leadership Bridges Self-Development Program. Program participants also learned about general estate planning, advanced healthcare directives, living wills, and establishing trusts. Feedback received from the mentee participants revealed that a majority had never

² Two mentors also participated as mentees in the second cohort.

participated in any career development program nor had a mentor. They reported that during the program, that they felt supported and encouraged to advance in their careers. They stated the coaching and assistance with goal setting was invaluable. The third cohort of the WLE Mentoring Program is scheduled to end in July 2021.

- Established and launched the DHS Disability Mentoring Program pilot. This program was developed to provide valuable career development opportunities for both mentors and mentees with disabilities. It also provided participants with the opportunity to learn from and network with colleagues across DHS. The program matched participants from across the Department and provided a forum to gain insight and perspective on the various career opportunities DHS had to offer. Mentee applicants were required to self-identify as having a disability as a condition to acceptance in the program. Mentor applicants were not required to self-identify as having a disability.

During the FY 2020 program pilot, CRCL selected 36 participants out of 47 applicants. Eighteen mentees were paired with 18 mentors. Of the 36 program participants, 27.78 percent self-identified as having a disability, with 16.67 percent self-identifying as having a targeted disability. After further review, it was verified that 94.44 percent of the mentee participants self-identified as having a disability, with 56 percent self-identifying as having a targeted disability. The program pilot is scheduled to end in the second quarter of FY 2021.

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

- The DHS Strategic Plan for Fiscal Years (FY) 2020-2024 includes *Goal 6: Champion the DHS Workforce and Strengthen the Department.*

The Department’s workforce strategy integrates diversity and equal opportunity:

“Maintaining a highly-skilled, diverse, and engaged workforce is critical to accomplishing the homeland security mission, which relies on dedicated personnel who go above and beyond to keep Americans safe from harm.

6.2.7 Promote a culture of transparency, fairness, and equal employment opportunity throughout the DHS workforce, providing avenues of redress and leadership support in addressing and resolving workplace conflict via integrated conflict management and Alternative Dispute Resolution systems.”

During FY 2020, 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); the Human Resources Policy Council; 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 2020-2024, 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 MD-715 and a review of Affirmative Action Plans for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities.
- DMS provided a briefing on the FY 2020 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.
- In support of DHS's reasonable accommodation program, CRCL and Component-level subject matter experts continued to collaborate with the Office of Accessible Systems and Technology (OAST) on the development and overall architectural design of an enhanced Accessibility Compliance Management System (ACMS 2.0). ACMS 2.0 is an enterprise-wide system available to all Components to manage, track, and report on all reasonable accommodation requests, including requests for Personal Assistance Services (PAS). After DHS initially deployed the new system in FY 2019, reports of system issues and additional enhancements were identified and addressed in FY 2019 and FY 2020. OAST and CRCL established a new workflow process to address all issues and requests for enhancements to effectively manage associated system updates. The system has proven to be agile. In response to the COVID-19 pandemic, OAST was able to quickly add a new category to capture "COVID-19" in the options drop-down list as a reason for a requested accommodation. The new system now has a built-in reporting capability to produce all reporting and recordkeeping requirements consistent with Title 29 C.F.R § 1614.203(d)(5) and Executive Order 13164.
- In FY 2020, the Strategic Marketing, Outreach, and Recruitment Engagement (SMORE) enterprise system was launched for Department-wide use. Since SMORE's Go-Live on October 1, 2019, it has simplified the way OCHCO reports and analyzes recruitment activities. Over 19,000 Master Events have been imported into SMORE, allowing analysis to be performed on historical data. The SMORE system is supplemented by two additional SharePoint sites (Recruiter's Portal and Joint Hiring Event Portal) which provides maximum data capture across the Department. SMORE

Power BI reports provide live results and complex visualizations with the capability to drill down further into the data. There are three dynamic and complex main dashboards which provide 20 unique dashboards documenting the recruitment and outreach efforts across the Department.

- The DHS Corporate Recruitment Council (CRC), brings together key recruiting personnel from across the Department. The Council develops annually a “Top 25” list of recruiting and outreach events that target diverse populations and events. This includes events that are focused on law enforcement, which represent approximately 40 percent of the positions at DHS. During FY 2020, the CRC developed process improvements/enhancements for the SMORE, adjusted recruitment strategies as a result of the COVID-19 pandemic, and they also discussed research insights on how to attract females to the Department’s mission critical occupations.
- DHS continued its use of the Pathways Programs (Pathways), the Federal government’s primary entry point for students³ and recent graduates⁴. In FY 2020, DHS hired 275 Pathways student interns, 181 recent graduates, and 15 Presidential Management Fellows, totaling 471 Pathways participants. Of these, 40.7 percent identified as members of a racial minority or ethnic group, and 54.1 percent were women.
- CRCL’s Director of Equal Employment Opportunity and Diversity:
 - The Director 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 *Solidarity: Engine of Equality*, with keynote speaker, Melissa Smislova, Deputy Under Secretary, Office of Intelligence and Analysis. This program, like all commemorative programming in 2020, was an homage to the Women’s Suffrage

³ Current students in high school, college, trade school, or other qualifying educational institutions may apply to participate in the Pathways Student Internship Program.

⁴ 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.

Centennial featuring women in key roles, i.e., keynote speakers, panel participants. The Pride Month program co-sponsored by CRCL and DHS Components also featured a moderated panel of women from the LGBT community representing eight DHS Components. The program using a virtual platform and audio conference bridge had 1,112 program attendees using their DHS computers with 115 attendees on the audio bridge.

- 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 2020. 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 (DEAC) 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.
- To establish the DEAC, CRCL instituted a charter that defined the scope and roles and responsibilities of the DEAC and its members. Through partnerships formed across the DHS Disability Program community, the Council is responsible for identifying and/or recommending DHS-wide initiatives to support employees and applicants with disabilities in all aspects of employment. The DEAC monitors each DHS Component's efforts to address disability employment program challenges and enhancements. The Council leverages its expertise and resources to fully support and promote a unity of effort to advance disability employment across the Department.
- Encouraged and ensured involvement in various recruiting initiatives targeting persons with disabilities throughout FY 2020.
- Ensured the accuracy and continued Department-wide distribution of the Disability Employment Fact Sheet. The Fact Sheet provides hiring officials with comprehensive information on increasing the employment of persons with disabilities. It also serves as a guide for all employees on the scope and purpose of the Department's disability employment program. The Fact Sheet was updated to include information on the final rule amending and clarifying affirmative action obligations under Title 29 C.F.R. § 1614. This information includes, but is not limited to, references to DHS's Annual Affirmative Action Plan, guidance on Personal Assistance Services (PAS), and DHS's

annual disability hiring goals. In order to provide additional information about the Department's selective placement program and its Schedule A appointment authority, a new Schedule A Fact Sheet was developed and distributed.

- Revised the Department's reasonable accommodation procedure to include 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 and Departmental reviews. CRCL anticipates final approval and implementation by mid-year 2021.
- In observance of the 30th Anniversary of the Americans with Disabilities Act of 1990 (ADA), hosted a DHS-wide virtual observance program. The program featured guest speaker Maria Town, President and CEO, American Association for People with Disabilities. This year's theme, "Access, Equity and Opportunity = Inclusion," emphasized how the ADA has worked to level the playing field, expanded opportunities for individuals with disabilities, and unlocked doors to full inclusion. During the program, leadership shared its commitment to supporting and promoting access, inclusion, and equal opportunity for individuals with disabilities in all its mission areas.
- 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). In FY 2020, DMS staff served as the central point of contact for all WHI HBCU related programs, activities, and reports as a member of the WHI HBCU Interagency Working Group (IWG). DMS ensured full participation in the Competitiveness Clusters in Federal Contracting, STEM, and Campus Safety and Resilience.
- DMS represented DHS in the HBCU Emergency Management Workforce Consortium. Its purpose is to increase the participation of HBCUs in DHS-sponsored programs, e.g., FEMA's Emergency Management Institute, and activities, e.g., FEMA's emergency management curricula and the establishment of Community Emergency Response Teams in underserved communities.
- 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.

- EEOD staff led the Department's participation in the WHI HBCU 2020 National HBCU Week Conference, by ensuring the involvement of DHS directorates and program offices in Conference-related panels and activities. DHS was recognized during the National Conference for the support and guidance CRCL's Deputy Officer and Director, EEO and Diversity provides as a senior leader to HBCU faculty, staff, and students through DHS-sponsored programs and activities. DMS staff was recognized by the WHI HBCU Executive Director for serving as the Co-Chair of the Campus Safety and Resilience Competitiveness Cluster and on the WHI HBCU Interagency Working Group.
- DMS staff also facilitated meetings of HBCU Chancellors and Presidents and faculty with DHS program offices and directorate leadership to improve the participation of women and persons of color in DHS internships and entry-level mission-critical positions. In response to a request by the Science and Technology Directorate's National Urban Security Technology Laboratory (NUL) Deputy Director, DMS facilitated a meeting between the NUL and Elizabeth City State University's (ECSU) Chancellor and ECSU Dean of School of Science, Aviation, Health and Technology. The discussion included opportunities for collaboration between the NUL and ECSU including the development of an internship for ECSU students pursuing degrees in unmanned aircraft systems.
- DMS compiled and submitted, to the WHI HBCU, the DHS HBCU Competitiveness Strategic Plan, reflecting projected plans of DHS Components and HQ Directorates for Fiscal Years 2021-2022. The Plan is prepared pursuant to the requirements of Executive Order 13779, *White House Initiative to Promote Excellence and Innovation at Historically Black Colleges and Universities*.
- DMS staff secured the participation of DHS Components and Headquarters program office staff in the Current Student and Recent Graduate Career Fair and the HBCU Industry Day Event and Matchmaking Session, held during the 2020 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 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. The 2020 Holocaust Remembrance program was canceled due to the COVID-19 pandemic.

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, and reasonable accommodation training to all Office of the Inspector General (OIG) employees. Ten sessions were held with approximately 300 employees receiving this training.
- CRCL provided EEO, anti-harassment, reasonable accommodation, and conflict resolution training for DHS Headquarters (HQ) employees. CRCL developed supervisory and nonsupervisory 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) New Employee Orientation programs.
- CRCL provided quarterly EEO training to supervisors participating in OCHCO's and the OIG'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.
- CRCL delivered four (4) reasonable accommodation training sessions to DHS Headquarters Human Resources, to CISA's supervisors and managers, as well as three (3) disability etiquette and awareness training to HQ and CISA employees. CRCL also provided one (1) COVID-19 related reasonable accommodation briefing to OCHCO.
- CRCL provided basic EEO training tailored specifically for supervisors who participated in DHS's Supervisory Leadership Bridges Program.

- The No FEAR Act training module was updated with a planned deployment in FY 2021 across DHS as mandatory training.
- CRCL issued a compliance guide for Component anti-harassment programs. The guide outlines how each Component's program should operate to ensure compliance with the DHS Anti-Harassment Instruction.
- CRCL awarded funding and began development of a new curriculum to replace the existing *Employment of People with Disabilities: A Roadmap to Success*. This is a mandatory training module for all hiring officials (managers/supervisors) and Human Capital and EEO Professionals. New training is scheduled to be implemented by September 2021.
- DHS's Disability Employment Program:
 - In FY 2020, DHS established (Department-wide and Component-specific) hiring goals of 12 percent for IWDs, and two percent for IWTDs respectively, in non-law enforcement and non-Transportation Security Officer (TSO) positions. In addition to the hiring goals by disability distribution, DHS continued its practice of setting a Schedule A hiring goal of 1.5 percent of all new hires in these positions.
 - In FY 2020, 14.8 percent of new hires were IWDs. Two percent were IWTDs excluding law enforcement and TSO positions. The new hires included permanent and temporary employees. The Department successfully met the IWDs new hires goal for the first time in FY 2020. DHS met its IWTDs new hires goal for the second year in a row. DHS ended the fiscal year with IWDs representing 11.8 percent of the total workforce and IWTDs representing 2.4 percent (excluding law enforcement and TSO occupations). DHS showed an increase of 0.8 percent for IWDs with no change from 2.4 percent for IWTDs.

Schedule A hires comprised 3.4 percent of all new hires in non-law enforcement and non-TSO positions, an increase of 0.4 percent compared to the 3.0 percent of Schedule A hires in FY 2019.

- 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 2020, CAP provided 330 accommodations DHS-wide to 121 employees, resulting in a cost savings of \$91,258.13 for DHS. Due to a change in the program's scope, effective FY 2021, CAP will no longer provide assistive technology or adaptive equipment to non-DOD agencies. Beginning FY 2021, DHS Components will absorb all costs associated with the provision of reasonable accommodations.

Essential Element E - Efficiency

During FY 2020, Components' usage of the DHS Shared Neutrals Program increased by over 25 percent compared to FY 2019, resulting in an estimated cost savings of \$150,000.00 for DHS.⁵ CRCL conducted two 90-minute refresher trainings for all mediators on the DHS Shared Neutrals roster.

During FY 2020, CMAS provided quarterly feedback to DHS Components on the quality of their Reports of Investigation (ROI) using 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 having engaged in discriminatory conduct. During FY 2020, CMAS processed 31 vetting requests totaling over 100 employees. CMAS dedicated additional internal resources to this process and completed 100 percent of vetting requests by their requested due date.

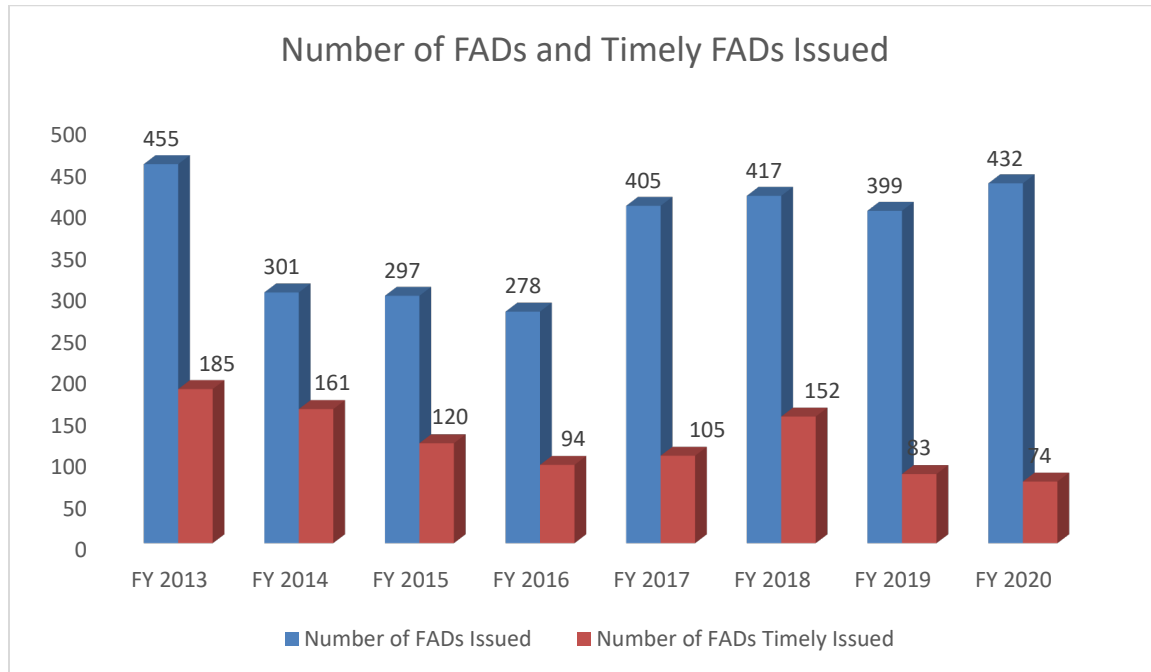
The CMAS Compliance Program monitors Components' progress in the implementation of remedial relief in decisions issued by the EEOC in which discrimination was found. During FY 2020, CMAS continued its collaboration with the EEOC's Compliance Officer, fostering an effective working relationship while focusing on the oldest cases pending implementation.

During FY 2020, CMAS issued or administratively closed over 1100 final agency actions in EEO complaints, including 893 merit final actions. DHS had an internal performance measure goal to issue 47 percent of merit final actions by their regulatory due date. Notably, 49 percent (437 of 893) of these merit-based final actions were timely issued. Accordingly, CMAS exceeded its timely issuance goal.

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. CMAS assigned many of the older cases to a contract vendor to draft FADs. By fiscal year end, 229 cases were assigned to the contractor, and 206 drafts had been received. This contract resource was invaluable in helping address the CMAS's FAD

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.

inventory. Nonetheless, due to resource shortages within CMAS and continuing increase in incoming requests for final action, the backlog inventory grew from 311 at the end of FY 2019, to 407 at the end of the FY 2020. Addressing backlog inventory will continue as a focus in FY 2021.



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. 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. These include, but are not limited to, several federal shared services, including the DHS Treasury Information Executive Repository, the Financial Systems Modernization project with the Department of the Interior, the Homeland Security Information Network (HSIN) upgrading project, the DHS Chief Human Capital Officer's (CHCO)'s HR Academy Career Path Tool, and the Acquisition Planning Forecast System by the DHS Office of Chief Procurement Officer. 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 2020 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. Accessibility Compliance Management System (ACMS), managed by the AHD, captured 8,165 disability-related requests.
- Over the course of 13 sprints, ACMS was transformed from an unusable system into a productivity tool that provided users the ability to capture, manage, and report on all Section 504 and 508 related activities across DHS.
- *Training Development/Delivery*: The OAST Training Program provides awareness and training on IT accessibility-related topics. OAST offered seven⁶ different training courses and logged a record-breaking 11,202 course completions during FY 2020 through online, classroom, one-on-one, and hands-on trainings. As a result, 1,235 individuals were able to receive their Trusted Tester certification worldwide. This number includes at least ten (10) individuals who self-identified as having a disability.

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 Managers, and 7) Creating Section 508 Compliant Documents (Word, Power Point, Excel, Adobe and Fillable Forms).

- OAST transitioned five⁷ instructor-led courses to on-demand online training courses to increase technical awareness and skills for developing and testing information communication and technology (ICT) content.
- OAST began collaborations with the DHS CRCL and CHCO's Strategic Learning Development and Engagement Office, Learning Technology and Innovation Division, to integrate Section 508 awareness content into the *Employment of People with Disabilities: A Roadmap to Success* mandatory disability training for supervisors and managers.
- *Outreach*: OAST hosted the first ever DHS Accessibility Day in May 2020 to increase disability and accessibility awareness across the Department with over 450 in attendance.
- 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 operation 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 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 Headquarters, OAST is responsible for testing IT applications for compliance based on Section 508 accessibility standards and best practices.
- OAST provided web application accessibility testing services for 32 major applications.
- OAST remediated over 6,000 document pages to ensure Section 508 conformance.
- OAST developed and released the Accessibility Conformance Reporting Tool (ACRT) to standardize 508 testing results into easy-to-read reports and to be in alignment with agile lifecycles.
- *Governance*: OAST continued its development of 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 pushed a major revision to the DHS Accessibility Requirements Tool (DART) 2.1 Section 508 Contract Language Generation tool. The purpose of the revision was to improve ease of use, add additional requirements for cloud-based services, and enhance tailoring capabilities by adding two new modules for project planning.
- OAST started an initiative to develop an Accessibility Services Delivery Model to improve flexibility and scalability of OAST programs.

⁷ The transitioned courses are: 1) ANDI Tools video training, 2) Creating Accessible Microsoft Word Electronic Documents, 3) Creating Accessible Microsoft Excel Electronic Documents, 4) Creating Accessible Microsoft PowerPoint Electronic Documents, and 5) Creating Accessible Adobe PDF Electronic Documents.

Due to the COVID-19 pandemic, most work shifted to remote execution. OAST created Department-wide guidance for emergency communications to ensure accessibility even at last-minute notice. OAST also provided guidance to emphasize the inclusive use of various collaborative platforms such as Microsoft Teams. Measures were taken to ensure that virtual meetings were accessible to a wide range of employees with and without disabilities.

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.

Workforce trend 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 an equal percentage of workforce 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 for 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 Department level, the pay plans across DHS Components were cross walked to the GS scale. The Department has utilized this approach 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 847 employees (0.44 percent) from 192,199 in FY 2019 to 193,046 in FY 2020.

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
FY20	15.9%	10.0%	11.3%	14.3%	9.2%	13.5%	21.8%	11.1%	5.4%
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 – 15.9% 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 2020, 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. 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 Customs and Border Protection Officers (CBPOs) and over half of Border Patrol Agents. CBPOs 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
FY20	6.5%	7.0%	6.7%	8.1%	2.8%	10.0%	6.2%	3.9%	1.8%
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 remained steady in FY 2020 and remains above the NCLF and RCLF participation rates. The hire rate decreased but remains above the NCLF and RCLF. The attrition rate decreased in FY 2020 and remains above the participation rate. The promotion rate decreased this past year but 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. The participation rates in the higher grades increased in FY 2020.

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
FY20	37.8%	37.5%	35.7%	36.2%	49.5%	27.5%	37.7%	46.0%	55.8%
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 – 37.8% of DHS, 38.3% of National Civilian Labor Force, 43.4% of Relevant Civilian Labor Force									

The White male workforce participation rate at DHS increased slightly in FY 2020. It dipped below the NCLF rate in FY 2018 and has remained below the RCLF rate. 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 the expected rate at the GS 13–15 and Executive/Senior Leader grades. The participation rate at grades GS 13–15 has been trending downward for the White male group since FY 2010, although at the Executive/Senior Leader level, the participation rate increased in FY 2020.

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
FY20	15.7%	18.9%	17.5%	17.3%	12.0%	17.4%	13.4%	17.3%	20.8%
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 – 15.7% 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. The hire rate continues to be above the participation rate, as does the attrition rate. The White female promotion rate continued to be above the participation rate, with White females represented at higher than expected rates in the higher pay grades. Their participation was highest at the Executive/Senior Leader pay grades.

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
FY20	7.6%	7.5%	9.3%	7.3%	13.8%	9.3%	6.8%	6.9%	6.5%
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 – 7.6% of DHS, 5.5% of National Civilian Labor Force, 4.7% of Relevant Civilian Labor Force									

The workforce participation rate and hire rate of Black males at DHS remained well above the NCLF and RCLF participation rates, although the hire rate has declined in the past four years. Representation in grades GS 13-15 has increased since FY 2010, although participation in those grades remained below the overall representation rate. The promotion rate dropped below the participation rate in FY 2020.

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
FY20	8.6%	10.2%	11.7%	8.4%	7.1%	12.8%	6.5%	7.5%	4.2%
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 increased since FY 2010 and remained flat since FY 2019, remaining above the NCLF and RCLF participation rates. This group was hired at a rate that was above the NCLF and RCLF since FY 2011. The promotion rate dipped below the representation in the workforce. Black females continue to have a higher than expected attrition rate. This group also had lower than expected participation in higher-graded positions; however, since FY 2010, the rate has trended 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
FY20	3.8%	3.8%	3.5%	3.9%	3.7%	4.3%	3.9%	3.4%	2.0%
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 2020, 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. Attrition was slightly below, while their promotion rate was slightly above, the 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 and at the Executive/Senior Leader level is 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
FY20	2.1%	2.4%	1.9%	2.4%	0.6%	2.5%	1.7%	2.2%	1.8%
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 the hire rate was above the benchmarks. In FY 2020, the attrition rate rose slightly but remained below the participation rate.

The rate of promotions of Asian females was 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
FY20	0.36%	0.30%	0.39%	0.31%	0.00%	0.48%	0.39%	0.21%	0.31%
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. In FY 2020, the attrition rate increased, exceeding the participation rate.

Native Hawaiian/Pacific Islander males' promotion rate fell below their participation rate in FY 2020. 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 trending slightly downward over the past two 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
FY20	0.25%	0.26%	0.28%	0.21%	0.00%	0.52%	0.17%	0.09%	0.00%
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: The percentages reported for Pacific Islander Females in the FY 2017 report contained an error. The error is corrected in the table above. The full set of workforce tables included with the FY 2017 report are correct; Only the trend table in the Executive Summary was in error.

Native Hawaiian/Pacific Islander females' participation and hire rates continue to exceed the NCLF and RCLF. The attrition rate decreased in FY 2020 but remains above the participation rate.

Native Hawaiian/Pacific Islander females were promoted below the participation rate. 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
FY20	0.60%	0.65%	0.58%	0.50%	0.48%	0.51%	0.62%	0.63%	0.83%
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 – 0.60% 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 decreased 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 increasing while remaining above the participation rate. The change reflected the number of employees at this pay level increasing from seven to eight in FY 2020.

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
FY20	0.31%	0.63%	0.36%	0.34%	0.12%	0.45%	0.25%	0.25%	0.31%
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 – 0.31% 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. The hire rate exceeded the NCLF and RCLF in FY 2020 while the attrition rate continued to be higher than the participation rate. The promotion rate was above the workforce participation rate. Native American females were overrepresented at grades 5-9 and underrepresented at all other grade levels, except Executive/Senior Leader. In FY 2020, Native American females increased from 0.11% representation at the Executive/Senior Leader level to 0.31%. This change reflects an increase from 1 to 3 Native American females at the Executive/Senior Leader level.

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.

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.

Summary of Triggers Identified in Workforce Trend Tables (FY 2010- FY 2020)

Entries indicate a trigger; no entry indicates no trigger

Group	% of Permanent Workforce (Participation Rate)	% of Hires	% of Attrition	% of Promotions	% of GS 13- Exec/Sr Lead
Hispanic Male				Below Participation Rate/ No Trend	Below Participation Rate/ No Change
Hispanic Female			Above Participation Rate/ No Trend		Below Participation Rate/ Trending Up
White Male	Below RCLF/ No Trend	Below RCLF/ Trending Up		Below Participation Rate/ No Trend	
White Female	Below RCLF/ No Trend	Below RCLF/ Trending Up	Above Participation Rate/ No Trend		
Black Male			Above Participation Rate/ No Trend	Below Participation Rate/ First time since FY16	Below Participation Rate/ No Change (GS13-15); No Trend (Executive/SL)
Black Female			Above Participation Rate/ Trending Up Since FY 2014	Below Participation Rate/ First time since FY16	Below Participation Rate/ Trending Up
Asian Male					Below Participation Rate/ Trending Up
Asian Female					Executive/SL Below Participation Rate/ No Trend
Pacific Islander Male*			Above Participation Rate/ No Trend	Below Participation Rate/ First time since FY11	Below Participation Rate/ GS13-15 Trending Up

Pacific Islander Female*			Above Participation Rate/ No Trend	Below Participation Rate/ No Trend	Below Participation Rate/ Trending Up
Native American Male*				Below Participation Rate/ No Trend	
Native American Female*	Below RCLF/ No Trend		Above Participation Rate/ Trending Down		Below Participation Rate/ GS13-15 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 2020. Participation in higher grades is increasing for several minority groups in recent years.

Examination of FY 2020 exit survey data indicated the top three non-retirement reasons for exiting DHS were lack of advancement opportunities, difficulties with management/supervisor, and personal/work-life issues. The FEVS 2020 administration opened September 14 and concluded on November 5, 2020, after the end of the fiscal year. The results were not available in time for inclusion in this report. The Best Places to Work organization has not updated their results and rankings for 2020. The most recent FEVS results and Best Places to Work data that are available are from 2019.

A review of Federal Employee Viewpoint Survey (FEVS) data from FY 2019 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.⁸

The 2019 Best Places to Work, which is based on FEVS results, ranked DHS 17th out of 17 large agencies.⁹ 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,

⁸ EEOC Women's Work Group Report, 2011

https://www.eeoc.gov/federal/reports/women_workgroup_report.cfmhttps://www.eeoc.gov/federal/reports/women_workgroup_report.cfm

⁹ DHS's score lowered by 0.8 points from FY 2018 to FY 2019.

personal/family related reasons, insufficient work/life programs, and lack of alternate work schedules.

Lower than expected representation at higher GS 13-15 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. 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 Component Part I's to address the issue, and a persistent upward trend in representation of women and minorities in higher grades, a new Part I at the 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
FY20	11.7%	14.3%	14.4%	12.3%	5.7%	9.9%	11.1%	14.0%	9.4%
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 – 11.7% of DHS, 17.4% excluding LEOs and TSA TSOs, 9.49% of the Federal government in 2018 ¹⁰ , 12.0% EEOC Goal									

¹⁰ EEOC Annual Report on the Federal Work Force Fiscal Year 2018.

The representation of individuals with disabilities continued to climb in FY 2020, rising to 11.7 percent for the permanent workforce, and 17.4 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 and disabled veterans with a Department of Veterans Affairs (VA) disability rating of at least 30 percent. Employees appointed under a disability-based Schedule A hiring authority who did not self-identify as having a disability are also included in these percentages.

DHS employees with disabilities in recent years separated at higher rates than their workforce participation rate. This gap continued to grow in FY 2020. Hires increased while the promotion rate held steady. Employees with disabilities are close to parity across the pay grades. They 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
FY20	1.25%	1.19%	1.77%	1.07%	1.6%	1.3%	1.1%	1.4%	0.6%
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 – 1.25% of DHS, 1.92% excluding LEOs and TSA TSOs, 1.61% of the Federal government in 2018 ¹¹ , 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. DHS's workforce with targeted disabilities 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, dropping slightly to 1.25 percent in FY 2020. Excluding law enforcement officers and TSOs, the overall FY 2020 rate is 1.92 percent,

¹¹ EEOC Annual Report on the Federal Work Force Fiscal Year 2018.

.08 percent short of the 2.0 percent EEOC goal. Hires increased in FY 2020 but remained below the 2.0 percent federal goal. The attrition rate of IWTDs is above their participation rate.

Representation of IWTDs is above the overall representation rate for the GS 13-15 grades, but below for the Executive/Senior Leader grades. Representation in promotions is below the representation rate.

DHS Employee Engagement, Satisfaction, and Inclusion

OPM annually administered the OPM Federal Employee Viewpoint Survey (FEVS) to DHS employees between FY 2005 and FY 2019. Because of the COVID-19 pandemic, the 2020 FEVS was administered later in the year from September 14 through November 5, 2020. Consequently, results of the FY 2020-21 administration were not available at the time this report was prepared. The results below provide recent trends up to FY 2019.

In FY 2016, after six straight years of decline, the employee engagement index increased from 53 percent in FY 2015, to 56 percent. In FY 2017, DHS continued this trend, with the employee engagement index increasing to 60 percent. In FY 2018, the index remained at 60 percent, rising in FY 2019 to 61.9 percent. In FY 2019, DHS remained below the government-wide rate of 61 percent for employee engagement even though DHS's Inclusion Index score increased one percent to 54 percent.

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

In FY 2020, CRCL deployed the second cohort of the Women in Law Enforcement Mentoring Program in January during National Mentoring Month. The second cohort with 48 participants paired 25 mentees located across the country with 23 mentors.¹² The mentee participants 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 Protective Service (FPS), and the U.S. Secret Service (USSS). The mentors, current and retired law enforcement officers, had extensive federal law enforcement experience.

Notably, DHS has the largest law enforcement population in the Federal government, but the lowest rate of participation by women. In FY 2019, women occupied approximately 8.80¹³

¹² Two mentees also served as mentors in the second cohort.

¹³ This corrects the 8.6 percent women law enforcement officers previously reported in the FY 2019 DHS MD 715 Report.

percent of law enforcement positions at DHS.¹⁴ In FY 2020, women occupied approximately 8.93 percent of the law enforcement positions at DHS. Although DHS saw a small increase, the female participation rate remains substantially lower than expected. The rate of women in law enforcement positions across the Federal government is 13.7¹⁵ percent.

Generally, the rate of women in Criminal Investigator (series 1811) law enforcement positions is also lower than the occupational civilian labor force participation rate for investigators, which is 23.63¹⁶ percent. In FY 2019, the percentage of permanent DHS Criminal Investigators who were women was 12.70 percent, slightly increasing to 12.72 percent in FY 2020.

Other actions taken by CRCL included:

- Coordinated invitations to Women In Federal Law Enforcement, 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 Strategic Learning and Development Office to solicit the participation of persons to participate in the deployment of the second cohort of the WLE Mentoring Program.

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 26, 2020. 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 disabled veterans with disability ratings of 30 percent or more (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 EEOC Annual Report on the Federal Work Force Fiscal Year 2018.

¹⁴ Title 5 U.S.C. § 8336(c) or § 8412(d) specifically applies to a special 20-year retirement system created for certain designated positions which require employees to meet vigorous physical demands. Because of the physical demands, this retirement system allows employees to retire sooner, with just 20 years of service. It also includes mandatory retirement when the employee reaches a designated age or years of service. Eligibility to retire under the 20-year provision depends on both the retirement system (CSRS or FERS) and the position. Positions covered under the 20-year retirement system include law enforcement officers.

¹⁵ Bureau of Justice Statistics, *Census of Federal Law Enforcement Officers, 2019*.

¹⁶ Occupational Civilian Labor Force participation for series 1811 Criminal Investigators is based on 2010 Census civilian labor force data.

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.

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 complaints, 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 requiring attention, including 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.



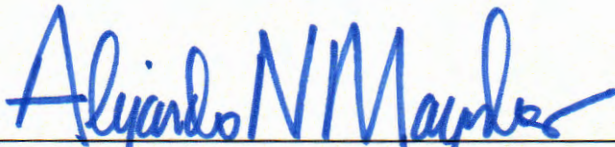
Signature of Principal Equal Employment Opportunity
Director/Official

Date

Veronica Venture

Deputy Officer, Office for Civil Rights and Civil Liberties
Director, Equal Employment Opportunity and Diversity
U.S. Department of Homeland Security

Certifies that this Federal Agency Annual Equal Employment
Opportunity Program Status Report is in compliance with
Management Directive 715



MAY 8, 2021

Signature of Agency Head or Agency Head Designee

Date

Alejandro N. Mayorkas

Secretary

U.S. Department of Homeland Security

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Part G: Agency Self-Assessment Checklist

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

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



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

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



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

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MD-715 - PART G Agency Self-Assessment Checklist

Essential Element A: Demonstrated Commitment from Agency Leadership This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.				
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments	Current Part G Questions 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-HQ, CBP	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 04/19/2020. ICE Issued policy statement in FY20. TSA Policy statement issued 12/26/2019. USCG Policy statement issued 06/12/2020. USSS Policy statement issued 10/28/2020 and 10/29/2020.	A.1.a.2
A.1.b	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender	Yes		New

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	identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]			
 Compliance Indicator  Measures	A.2 – The agency has communicated EEO policies and procedures to all employees.	Measure Met? (Yes/No/NA)	Comments	Current Part G Questions 12-18-2019
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)]	Yes		New
A.2.b.2	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	Yes		A.2.c
A.2.b.3	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	No-HQ	CBP https://www.cbp.gov/about/eeo-diversity/reasonable-accomodation DHS https://www.dhs.gov/reasonable-accommodations-dhs FEMA https://intranet.fema.net/org/oa/ooer/Documents/Reasonable%20Accommodation%20Policy%20FM%20123-6-1.pdf FLETC https://www.fletc.gov/reasonable	A.3.c

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			e-accommodation-request-procedures-pdf ICE https://www.ice.gov/leadership/dcl TSA Internal: https://office.ishare.tsa.dhs.gov/sites/WPED/WPED Info Center/SitePages/Reasonable Accommodations.aspx External: https://www.tsa.gov/ab/out/jobs-at-tsa USCG https://www.uscg.mil/Family/Civil-Rights/faq/ USCIS https://www.uscis.gov/sites/default/files/document/legal-docs/Disability-Accommodations-for-Employees-and-Job-Applicants-MD-256-006.pdf USSS https://www.secretservice.gov/join/diversity	
A.2.c	Does the agency inform its employees about the following topics:			
A.2.c.1	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often.	Yes	CBP Quarterly pay stubs, annually sent to supervisors, posted on intranet and Notice of Rights Action Letters. FEMA On going and on the internet	A.2.a

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			<p>https://usfema.sharepoint.com/sites/OAI/ooer/Pages/EEOD.aspx .</p> <p>FLETC Annual training, annually sent to supervisors 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. The complaint process is available on ODCR's intranet site.</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 • Biennially – No FEAR Act • Triennially – Civil Rights Awareness Training <p>USCIS</p> <ul style="list-style-type: none"> • Informs its employees about the EEO process when they onboard and, thereafter, annually and 	
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			<p>with the EEO policy statement.</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	<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 (ODCR) intranet page. New managers and supervisors are also informed of the process during mandatory training sessions.</p> <p>USSS</p>	New

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			<ul style="list-style-type: none"> • New Employee Orientation • Uniformed Division Introductory Course/Special Agent Introductory Course Training (twice per month) • 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 • Early Dispute Resolution Policy (EDRP) 	
A.2.c.3	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Yes	<p>CBP Provided 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 and ongoing. Communicated to all employees in the new employee orientation, supervisor essentials training, other trainings delivered and communicated to employees when RAs are requested. https://usfema.sharepoint.com/sites/OAI/ooer/Pages/RA.aspx</p> <p>FLTEC Annual training and posted on Intranet.</p>	New

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			<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.</p> <p>TSA HR Essentials Module on Reasonable Accommodation presented via Adobe Connect two 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 <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 	
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			<p>Introductory Course Training (twice per month)</p> <ul style="list-style-type: none"> • 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 and through ongoing communication. https://usfema.sharepoint.com/sites/OAI/Pages/Office-of-Professional-Responsibility.aspx</p> <p>FLETC Annual training and posted on Intranet.</p> <p>HQ During new employee orientation and when training is requested,</p> <p>ICE AH policy is on ODCR’s intranet site. ICE also provides AH policies and procedures biweekly during new employee orientation and</p>	New



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			<p>during annual mandatory training for new managers and supervisors.</p> <p>TSA Annual Mandatory Online Learning Center (OLC) training and onsite briefings upon request, new training collaboration for managers with AHP and CRDI also began this FY.</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). • Uniformed Division Leadership Training (Monthly) • Cornerstone Leadership Training (Monthly) • HRT-04(06) Prevention of Unlawful Harassment in the Workplace 	
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			• 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 and through ongoing communication. https://intranet.fema.net/org/oa/Documents/FEMA%20OPR%201%20Pager/Federal%20Emergency%20Management%20Agency%20Anti-Harassment_02.20.2020.pdf.</p> <p>FLETC Annual training and posted on Intranet.</p> <p>HQ During new employee orientation and when training is requested.</p> <p>ICE The topic is covered in the Anti-Harassment Policy letter that is disseminated and publicized on the ICE intranet website.</p> <p>TSA Management Directive (MD) 1100.73.3, “Anti-Harassment Program,” was signed on August 16, 2017 and sent to all employees via a TSA broadcast message email. In addition, we provide new hire employee training every two weeks.</p>	A.3.b



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			<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 New Compliance Indicator	Current Part G Questions 12-18-2019
A.3.a	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes,” provide one or two examples in the comments section.	Yes	<p>CBP Recognition provided with Commissioner's EEO/Diversity Award. FY 2020: Pending Write Up.</p> <p>FEMA Recognition provided via FEMA Administrator's Award held on July 30, 2020. Two awards were given for diversity management and inclusion.</p> <p>FLETC The Administrator's Awards was held on July 30, 2020. Two awards were given for diversity management and inclusion. Recognition on FLETC Intranet, recognition in staff meetings; management</p>	New

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			<p>recognition with performance evaluations.</p> <p>HQ DHS Secretary has EEO-related categories in annual Secretary's Awards,</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 • 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</p>	
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			of employment opportunity, promoting a diverse workforce, and creating a workplace culture of inclusion. 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.	
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.				
 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	Current Part G Questions 12-18-2019
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	CBP The EEO Director reports to Executive Director, Privacy and Diversity Office who is under the direct supervision of the CBP Deputy Commissioner. FLETC The EEO Director reports to the Chief of Staff in the Director's Office and has	B.1.a

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			unlimited access to the Director. USCG Commandant, through Vice Commandant.	
B.1.a.1	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If "yes," please provide the title of the agency head designee in the comments.	No-CBP N/A-TSA, USCG, USSS	FEMA Chief of Staff. FLETC Chief of Staff. 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. USCG Reports to the USCG Vice Commandant. USCIS EEO Director reports to the Deputy Director for operations. USSS EEO Director does report to the Director of the Secret Service.	New
B.1.a.2	Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes		B.1.d
B.1.b	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes		B.2.a
B.1.c	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes," please provide the date of the briefing in the comments column.	No-DHS, USCG	CBP presented on 09/25/2020. DHS Due to changes in acting DHS Secretaries during the	B.2.b

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			<p>year, the SOA brief did not get scheduled in FY 2020.</p> <p>FEMA presented on 07/15/2020.</p> <p>FLETC presented to Director on 05/15/2020.</p> <p>HQ Provided briefings to various HQ Programs, and to Deputy Officer for CRCL during FY 2020.</p> <p>ICE 03/16/2020.</p> <p>TSA presented on 06/29/2020.</p> <p>USCIS presented on 09/29/2020</p> <p>USSS 06/25/2020 -06/30/2020</p>	
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		New
 Compliance Indicator  Measures	B.2 – The EEO Director controls all aspects of the EEO program.	Measure Met? (Yes/No/NA)	Comments New Compliance Indicator	Current Part G Questions 12-18-2019
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

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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, CBP		New
 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	Current Part G Questions 12-18-2019
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)]	No-CBP		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	FEMA EEO principles are identified here: "As an agency, diversity and inclusion are key components 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	New

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			<p>entire population we serve are considered. https://www.fema.gov/sites/default/files/2020-03/fema-strategic-plan_2018-2022.pdf</p> <p>FLETC Develop recruiting strategies that support FLETC's near- and long term-term staffing goals.</p> <p>3.01.02.05 Foster a high performing, diverse, and inclusive workforce.</p> <p>HQ The DHS Strategic Plan Fiscal Years 2020 - 2024 plan's objective to develop and maintain a high performing workforce: Promote a culture of transparency, fairness, and equal employment opportunity throughout the DHS workforce, providing avenues of redress and leadership support in addressing and resolving workplace conflict via integrated conflict management and Alternative Dispute Resolution systems.</p> <p>ICE ICE's FY 2021-2025 Strategic Plan Goal 1: Empower the Workforce That Powers the Mission Objective 1.1: Recruit, Hire, and Retain a Diverse and Highly Capable Workforce.</p>	
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			<p>TSA Commitment to Our People: TSA's 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 organizational 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. USCG referenced the Strategic Plan FY 2018-2020.</p> <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.</p>	
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			Goal 3: Identify, Develop, and Empower Leaders. Goal 4: Modernize Business Processes. Goal 5: Increase Communication and Collaboration.	
 Compliance Indicator  Measures	B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.	Measure Met? (Yes/No/NA)	Comments	Current Part G Questions 12-18-2019
B.4.a	Pursuant to 29 CFR § 1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:			
B.4.a.1	To conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	No-CBP		B.3.b
B.4. a.2	To enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	No-CBP, 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		E.5.b
B.4.a.4	To provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	Yes		B.4.f & B.4.g
B.4.a.5	To conduct thorough, accurate, and effective field audits of the EEO programs in Components and the field offices, if applicable? [see 29 CFR § 1614.102(c)(2)]	No-CBP N/A-FLETC, TSA, FEMA		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.	No-USCG	USCG Funding and/or a dedicated resource may be necessary to modify current and/or acquire new data system to meet EEOC data	New





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			collection, analysis, and reporting requirements.	
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]	No-ICE		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)]	No-CBP		B.4.d
B.4.a.11	To ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Yes		New
B.4.b	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	No-CBP	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

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 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments New Indicator	Current Part G Questions 12-18-2019
	B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.			
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)]	No-HQ		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
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 While ADR is included in annual training for supervisors and managers, this training does not include discussion of the ADR Act or EEOC regulations and policy guidance as required by MD-110.	E.4.b
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments New Indicator	Current Part G Questions 12-18-2019
	B.6 – The agency involves managers in the implementation of its EEO program.			
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, USCIS N/A-FEMA, USCIS	CBP Barrier analysis is currently conducted by the EEO Office. FEMA Has not completed barrier analysis.	D.1.a

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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. FLETC Although no barriers have been identified, senior managers assist with barrier analysis and actions plans 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. USCIS Barriers have not been identified.	D.1.c

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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	Current Part G Questions 12-18-2019
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- CBP, HQ, FEMA N/A-, FLETC, TSA	DHS Collects mid-year Part G updates from Components and conducts one-on-one reviews and meetings with Components to discuss program deficiencies. FLETC Annually although no barriers were identified. ICE ODCR conducts annual site visits to 70+ field offices, which includes a review of EEO program deficiencies. TSA Does not have subordinate level Components. USCG Uses the Annual Command Checklist. USCIS A program assessment is distributed to program offices and directors in Oct/Nov each year. USSS Assesses and enhances internal management accountability by conducting assessments of	New

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			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.	
C.1.b	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.	No-CBP, FEMA, HQ, USCIS	<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>FLETC Annually</p> <p>ICE ODCR 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 Following the assessment, commands develop plans to address deficiencies if any.</p>	New

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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)]	No-CBP, FEMA N/A-FLETC, HQ, TSA,	TSA Does not have subordinate level Components. USCIS No field audits have been conducted.	New
 Compliance Indicator  Measures	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (Yes/No/NA)	Comments New Indicator	Current Part G Questions 12-18-2019
C.2.a	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	No-FLETC		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-CBP		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 Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes		New

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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 Office of Equal Rights (OER) does not refer nor report any EEO counseling activity alleging harassment to the Office of Professional Responsibility (OPR). 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-HQ	HQ Percentage completed timely is 0 percent. USCG conducts prompt inquiries of all harassment allegations (within a specific period of time to complete the inquiry); The USCG average time in FY20 to start the inquiry was 4 days.	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)]	Yes	USSS Covered during Reasonable Accommodation Training/FACT Sheet.	New
C.2.b	Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR 1614.203(d)(3)]	No-FLETC, HQ		New
C.2.b.1	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]	Yes		E.1.d
C.2.b.2	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	No-CBP		New

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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, FLETC, ICE, TSA, USCG, USSS	<p>CBP 37.5% percent reasonable accommodation requests were timely processed within the reasonable accommodation procedures time frame.</p> <p>FEMA 45% percent of reasonable accommodation requests were timely processed within the reasonable accommodation procedures time frame.</p> <p>FLETC 71.5% percent of all reasonable accommodation requests were timely processed within the reasonable accommodation procedures time frame.</p> <p>ICE 49% of reasonable accommodation (RA) requests were processed within 15 business days; although the goal is to process 90% of RA requests within the timeframe set forth in the agency standard operating procedures.</p> <p>TSA 88% of all cases were processed within the time</p>	E.1.e

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			<p>frame set forth in the reasonable accommodation procedures.</p> <p>USCG 89.40% percent of reasonable accommodations request were timely processed within the reasonable accommodation procedures time frame.</p> <p>USSS 100% percent of reasonable accommodation request for employees have been processed timely. (Average: seven days).</p> <p>83% of accommodation requests for applicants have been processed timely. (Average: 17 days).</p> <p>98% of all accommodation requests, for employees and applicants, have been processed successfully within 20 business 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, HQ		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.	Yes	<p>CBP https://www.cbp.gov/about/eo-diversity/reasonable-accommodation</p> <p>DHS https://www.dhs.gov/reasonable-accommodations-dhs</p>	New

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			<p>FEMA https://www.fema.gov/media-library-data/1583781528921-c2d0bb95b5ce141db465f238d686840f/reasonable-accommodation-policy_2020.pdf</p> <p>FLETC https://www.fletc.gov/external/personal-assistance-services</p> <p>ICE https://www.ice.gov/doclib/about/offices/dcr/icePASP.pdf</p> <p>TSA https://www.tsa.gov/ab/out/jobs-at-tsa</p> <p>USCG https://www.uscg.mil/Family/Civi-Rights/fag</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. https://www.secretservice.gov/join/diversity/</p>	
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 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	Current Part G Questions 12-18-2019
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.I]	Yes		A.3.a.1
C.3.b.2	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR § 1614.102(b)(6)]	Yes		A.3.a.4
C.3.b.3	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	Yes		A.3.a.5
C.3.b.4	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	Yes		A.3.a.6
C.3.b.5	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR § 1614.102(a)(7)]	Yes		A.3.a.7
C.3.b.6	Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR § 1614.102(a)(8)]	Yes		A.3.a.8
C.3.b.7	Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]	Yes		New
C.3.b.8	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]	Yes		A.3.a.2
C.3.b.9	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	Yes		New
C.3.c	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR § 1614.102(c)(2)]	No-CBP, USCIS	USSS (apart from disciplinary actions). All disciplinary actions are covered under ITG-04.	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, FEMA N/A-ICE, TSA, USCIS	<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 Office of Professional Responsibility and/or Chief Counsel program offices, has the final decision.</p> <p>USCIS No recommendations have yet been made.</p> <p>USCG All disciplinary actions are covered under ITG-04.</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	Current Part G Questions 12-18-2019
C.4.a	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	Yes		New
C.4.b	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	Yes		C.2.a, C.2.b, & C.2.c
C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs,	No-USCIS, USCG		New

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	etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]			
C.4.d	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	Yes		New
C.4.e	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:			
C.4.e.1	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR § 1614.203(d); MD-715, II(C)]	No-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	Current Part G Questions 12-18-2019
C.5.a	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)]	Yes		C.3.a.
C.5.b	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR § 1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Yes	CBP: One manager received a letter of counseling. One manager received a reprimand. One manager received a reduction in grade. One manager was removed. Two managers were suspended. One employee was removed. HQ None during this period.	C.3.c

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			ICE Four individuals were referred to OPR and OHC for potential disciplinary action based on findings of discrimination. These cases are currently pending.	
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)]	No-CBP	USCG There is no single process in place to capture all instances.	New
 Compliance Indicator  Measures	C.6 – The EEO office advises managers/supervisors on EEO matters.	Measure Met? (Yes/No/NA)	Comments	Current Part G Questions 12-18-2019
C.6.a	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If “yes,” please identify the frequency of the EEO updates in the comments column.	No-HQ	<p>CBP Memoranda are issued quarterly with information on EEO complaints, workforce demographics, legal updates 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 Annually</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</p>	C.1.a

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			<p>complaint data to all visited sites throughout the FY.</p> <p>USCG This occurs in various forums, i.e., triennial training, weekly meetings, No Fear act postings, newsletter, etc.</p> <p>USCIS The Annual State of EEO briefing to executives, demographic snapshots are available by request, EEO senior leadership conducts meet and greets between the OEOI Chief and Deputy Chief with program offices and directorate senior leadership.</p> <p>USSS Annually.</p>	
C.6.b	Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I]	Yes		New
<p style="text-align: center;">Essential Element D: Proactive Prevention</p> <p style="text-align: center;">This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.</p>				
 Compliance Indicator  Measures	D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.	Measure Met? (Yes/No/NA)	Comments	Current Part G Questions 12-18-2019
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	New

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			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.	
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 uses the DHS exit survey. DHS CRCL worked with the DHS Exit Survey Working Group. Questions were developed to capture responses that can be utilized to enhance initiatives for recruiting, hiring, retaining, and the advancement of persons with disabilities. Use of the revised Exit Survey was implemented on April 7, 2020.	New
 Compliance Indicator  Measures	D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Measure Met? (Yes/No/NA)	Comments New Indicator	Current Part G Questions 12-18-2019
D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	No-FEMA		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-FEMA, HQ		B.2.c.2
D.2.c	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR § 1614.102(a)(3)]	No-HQ		B.2.c.1
D.2.d	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate	No-FEMA, HQ	CBP Complaint data, exit surveys, program evaluations	New

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	<p>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.</p>		<p>and special emphasis program.</p> <p>FLETC Complaint Data/ ICOMPLAINTS, AXIS, NFC, Monster Solutions, DHS/CRCL, FLETC/Human Capital Office.</p> <p>ICE ODCR reviews the following: complaint/grievance data; employee climate surveys; focus groups; site visits, and evaluative data from the Special Emphasis Programs.</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"> • Affinity Group Council (AGC) • AFGE Local 1495 • CG Anti-harassment program • CG Reasonable Accommodation Program Checklist) • Complaints/grievance • DHS Exit Surveys • Employee Climate Surveys • External Special Interest Groups • Focus Groups • Program Evaluation (Command 	
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			<ul style="list-style-type: none"> Special Emphasis Programs <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> <p>USSS</p> <ul style="list-style-type: none"> 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	Current Part G Questions 12-18-2019
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, LETC	<p>FEMA secured a barrier analysis contract for FY21.</p> <p>FLETC No barriers identified.</p> <p>USCIS No barriers identified.</p>	New
D.3.b	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	No-HQ N/A-FEMA, USCIS, FLETC	<p>FEMA secured a barrier analysis contract for FY21.</p> <p>FLETC No barriers identified.</p> <p>USCIS No barriers have been identified.</p>	New

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D.3.c	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	No-HQ N/A-FEMA, FLETC, USCIS	FEMA secured a barrier analysis contract for FY21. 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	Current Part G Questions 12-18-2019
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-HQ	CBP https://www.dbp.gov/about/eeo-diversity/diversity-inclusion DHS https://www.dhs.gov/reports-office-civil-rights-and-civil-liberties FEMA https://www.fema.gov/sites/default/files/2020-09/fema_affirmative-action-plan.pdf FLETC https://www.fletc.gov/affirmative-action-plan-pdf ICE https://www.ice.gov/leadership/dcr TSA https://www.tsa.gov/about/jobs-at-tsa/individuals-with-disabilities	New

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			USCG https://www.uscg.mil/access/ 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

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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	Current Part G Questions 12-18-2019
 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(I)?	Yes		New
E.1.d	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments.	No-FEMA	FEMA The average processing time in FY 2019 was 223 days. FLETC The average processing time is 18.3 days. HQ Average processing time is 60 days. ICE The average time to issue acceptance decisions was 49 days. TSA In FY 2020, TSA took an average of 27 days to issue acceptance letters. The Department of Homeland Security is responsible for issuing final agency decisions dismissing complaints.	New

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			<p>USCIS The average number of processing days to issue accept letters is 54 days.</p> <p>USSS</p> <ul style="list-style-type: none"> • The average processing time of issuing acceptance letters is 57.73 days. • The average processing time of issuing dismissal letters is controlled by CRCL. 	
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	<p>ICE The Agency works diligently to produce timely and complete investigations; however, ODCR lacks necessary resources to meet all regulatory timeframes. Although staffing dedicated to complaint processing decreased from FY 2019 to FY 2020, process efficiency improvements implemented reduced the average investigation time 21% from 436 days in FY 2019 to 344 days in FY 2020. The percentage of timely-completed investigations increased 169% from 12.6% in FY 2019 to 33.8% in FY 2020.</p>	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)?	N/A-FLETC		New

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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	<p>FLETC EEO Complaints Manager, along with Procurement Office, immediately contacts contract investigative company to address deficiency.</p> <p>HQ Contractors are held to performance standards 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>	E.2.c

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			<p>USCIS Processing timeframes and sufficiency standards are included in the contract statement of work.</p> <p>USSH Worked directly with Procurement Division to remove contractors who do not comply with the performance statement of work. The Formal Complaints Program Manager monitors the work of contractors.</p>	
E.1.k	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes		New
E.1.l	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes		New
 Compliance Indicator  Measures	E.2 – The agency has a neutral EEO process.	Measure Met? (Yes/No/NA)	Comments Revised Indicator	Current Part G Questions 12-18-2019
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	<p>USSH EEO legal sufficiency reviews are conducted by a member of the Office of Chief Counsel who has no other involvement with the EEO process other than providing legal sufficiency reviews.</p>	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.	No-CBP	<p>CBP Acceptance/Dismissal decisions are final agency decisions which are reviewed and issued by CRCL.</p> <p>DHS Two dedicated attorneys, who have no role in the</p>	E.6.a

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			<p>agency's defensive function, are embedded.</p> <p>FLETC EEO Officer.</p> <p>HQ Complaints Manager is an attorney, and the EEO Director is also an attorney. Also, the office was staffed with two legal advisors from the Office of General Counsel (OGC) who are available to assist with 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 conduct the sufficiency review are attorneys. The Complaints</p>	
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			Manager who oversees all sufficiency reviews is also an attorney. USSS The attorney conducting legal sufficiency reviews has no role in the Agency's defensive function.	
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)]	No-CBP NA-FEMA, FLETC	USCIS The EEO office does not rely on the agency's defensive function to conduct the legal sufficiency review. FLETC Agency's defense counsel does not conduct the legal sufficiency review.	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)]	No-CBP		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)]	No-CBP N/A-HQ, FEMA, FLETC	FLETC Agency's defense counsel does not conduct the legal sufficiency review.	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	Current Part G Questions 12-18-2019
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	USSS Early Dispute Resolution Program (EDRP)	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

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E.3.e	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	No-CBP		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	Current Part G Questions 12-18-2019
E.4.a	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:	Yes		
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-USCG, USCIS		New
E.4.a.5	The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]	No-USCG		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]	Yes		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	Current Part G Questions 12-18-2019
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	DHS Complaint trends, quarterly diversity dashboards HQ Complaints Program tracks trends for program	E.5.e

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			<p>offices (e.g. FPS, CISA, I&A) by issues and bases over several fiscal years and provides aggregate results to the programs offices.</p> <p>USSS Produced a detailed, informational "QUAD Chart" that analyzes the agency's Strengths, Weaknesses, Opportunities and Threats (SWOT) as they relate to inclusive diversity.</p>	
E.5.b	<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>	Yes	<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 DHS Accommodation Procedures; DEAC; SRDI and quarterly DHS Component Meetings.</p> <p>HQ DHS has six component-wide working groups for this purpose.</p>	E.5.g

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			<p>ICE reviewed best practices across agencies to streamline processing of reasonable accommodation requests. As a result of the reviews conducted, RA procedures are currently being updated.</p> <p>TSA The EEO Director or a designated representative meets with other DHS EEO Directors on a monthly basis to discuss best practices.</p> <p>USCG reviewed and adopted best practices from DHS. For example, USCG adopted the practice of checking the facilities for Section 504 related accessibility compliance by forming an interdepartmental working relationship with the Facilities Operation's Manager and DHS Safety and Occupational Health Manager. This best practice is ongoing.</p> <p>USCIS benchmarked other agencies' resurveying practices, reasonable accommodation practices, and their 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>	
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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	USSH Benchmarked against data contained in the EEOC's annual report. At the close of each year, the EEO Director conducts an internal assessment of the EEO Program.	E.3.a
<p style="text-align: center;">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>				
 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	Current Part G Questions 12-18-2019
F.1.a	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR § 1614.102(e); MD-715, II(F)]	Yes		F.1.a
F.1.b	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	Yes		E.3.a.6
F.1.c	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes		F.2.a.1
F.1.d	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes		F.2.a.2
F.1.e	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	Yes		F.3.a.
 Compliance Indicator  Measures	F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Measure Met? (Yes/No/NA)	Comments Indicator Moved from E-III Revised	Current Part G Questions 12-18-2019
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

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F.2.a.1	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR § 1614.108(g)]	Yes		E.3.a.5
F.2.a.2	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR § 1614.501]	Yes		E.3.a.7
F.2.a.3	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR § 1614.403(e)]	Yes		New
F.2.a.4	Pursuant to 29 CFR § 1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes		F.3.d (1 to 9)
 Compliance Indicator  Measures	F.3 - The agency reports to EEOC its program efforts and accomplishments.	Measure Met? (Yes/No/NA)	Comments	Current Part G Questions 12-18-2019
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	Components contribute information to the DHS No FEAR Act report.	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; Part H.3 is new in FY 2020; Part H.2 was 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. These include deficiencies in the anti-harassment program, barrier analysis, field audits, state of agency briefing, applicant flow data, disciplinary action recommendations, and EEO principles in strategic plans. 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
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	7/31/2021	
7/31/2019	CRCL/DMS staff meet one-on-one with each Component EEO function and review program deficiencies, actions, accomplishments, and plans	Yes	7/31/2021	
12/1/2019	Data call to all Components for end-year Parts G, H and J, including progress made on deficiencies (Part H); Consolidate into Department Part G and compare to prior fiscal year Part G	Yes	12/1/2021	

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2020	<p>Since these are ongoing, annual activities, DHS updated the Modified dates to 2021 although all three activities were completed for the FY 2020 reporting year.</p> <p>The data call to all Components for the mid-year update on Part G measures was issued on 5/12/2020 and compiled by CRCL/DMS staff.</p> <p>CRCL/DMS staff conducted one-on-one meetings with each Component EEO function and review program deficiencies, actions, accomplishments, and plans.</p>

	<p>The data call to all Components for end-year Parts G, H, and J was issued and the Component Part G input was consolidated into this departmental MD-715 report (see Executive Summary).</p>
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	<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>

MD-715 – Part H.2

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

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

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

Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element A: Demonstrated Commitment from Agency Leadership	A.1.a: During FY 2018 the Department did not issue the signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/01/2018	Release and post the Department-wide EEO Policy Statement to include all basis as identified by EEOC in its Instructions to Federal Agencies for MD-715 (dated September 2017).	09/06/19	10/11/2019	10/11/2019

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Officer, CRCL	Katherine Culliton-Gonzalez	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	10/22/2019
09/06/2019	Post final signed and dated EEO Policy Statement with written commitment to release yearly.	Yes	10/11/2019	10/11/2019

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2020	Issued policy email statement on 10/11/2019.

MD-715 – Part H.3

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

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)
10/01/2020	Prepare and present to the head of the agency the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process.	09/30/21		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Officer, CRCL	Katherine Culliton-Gonzalez	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)
06/01/2021	Prepare and finalize the State of the Agency briefing.	Yes		
09/30/2021	Present the State of the Agency briefing to the agency head or designee.	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2020	N/A

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	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)?

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	9/30/2021	
9/30/2013	2. Coordinate with DHS Components to develop supplemental internal controls regarding timeliness of investigations.	Yes		9/30/2013
9/30/2013	3. Coordinate with DHS Components to develop streamlined review processes to expedite issuance of Reports of Investigation.	Yes		9/30/2013
9/30/2017	4. Coordinate barrier analyses across Components through the EEO Director's Council, which implements the EEOD Strategic plan and activities	Yes		9/30/2017
9/30/2016	5. Provide MD-715 Training to ensure compliance and to ensure the document serves as a useful resource for managers/supervisors.	Yes		9/30/2016
9/30/2018	6. Develop a brochure to promote the use of alternative resolutions to address workplace disputes and issues.	Yes	9/30/2019	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	9/30/2021	

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2020	<p>Activity #1</p> <p>DHS achieved full operational capability for its talent management system (referred to as the Performance and Learning Management System or PALMS) for most Components. DHS will continue to identify qualifying career development programs and related courses, as well as produce a report in compliance with MD-715, 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.</p>

	<p>Activity #7</p> <p>During FY 2020, CMAS issued or administratively closed over 1100 final agency actions in EEO complaints, including 893 merit final actions. DHS had an internal performance measure goal to issue 47 percent of merit final actions by their regulatory due date. Notably, 49 percent (437 of 893) of these merit-based final actions were timely issued. Accordingly, CMAS exceeded its timely issuance goal.</p> <p>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, 229 cases were assigned to the contractor and 206 drafts had been received. This contract resource was invaluable in helping address the CMAS FAD inventory. Nonetheless, due to resource shortages within CMAS and continued increased incoming requests for final action, the backlog inventory grew from 311 at the end of FY 2019, to 407 at the end of the FY 2020. Addressing backlog inventory will continue as a focus in FY 2021.</p>
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 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</p>

	<p>The ADR brochure was completed 7/10/2019.</p> <p>Activity #7</p> <p>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</p> <p>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 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</p> <p>The ADR brochure is scheduled to be completed in FY 2019.</p>

	<p>Activity #7</p> <p>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</p> <p>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</p>

	<p>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 expected representation of multiple Ethnicity and Race Indicators (ERI) groups and women at higher pay grades, 2) overall lower than expected rate of participation of women, and 3) lower than expected rate of participation of IWD and IWTD. The group observed that Component Parts I and J included the most significant triggers relevant to each Component. The group is exploring with the full DHS EEO Council the efficacy of establishing cross-Component barrier analysis teams to further explore the common triggers.</p> <p>CRCL conducted a DHS-wide study on women in law enforcement. The report on the study, identified perceived barriers to EEO and diversity; provided recommendations and strategies to achieve a model workplace; and highlighted best practices from within DHS and from other federal law enforcement agencies. Because some of the recommendations related to the Federal Women's Program, implementation has occurred via Special Emphasis Programs at the various Components, particularly during National Women's History Month. These programs highlight some of the challenges that women in law enforcement faced, and how women have managed the challenges.</p> <p>In addition, CRCL DMS, in coordination with the DHS EEO Council Strategic Plan Working Group on Department-wide Special Emphasis</p>
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	<p>Program management, conducted Basic and Advanced barrier analysis training for DHS EEO professionals with MD-715 and data management responsibilities.</p> <p>Activity #5: Completed 9/30/2016</p> <p>DMS completed the EEOC MD-715 FY 2016 Agency Self-Assessment Checklist, which identified areas requiring improvement to achieve a Model EEO Program. DMS held quarterly Component meetings that included reviews and discussions of the MD-715 Model EEO program report; Special Emphasis Programs; Disability Employment Program; statistical reports; and emerging guidance, regulations, and program requirements.</p> <p>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.</p> <p>In FY 2016, CRCL partnered with OCHCO Diversity and Inclusion staff and the Office of Human Capital Data Analytics to provide training and guidance to Component level EEO and HR Professionals. The training included the data systems available to support MD-715 reporting requirements specifically DHS's Business Intelligence system powered by AXIS, NFC Insight, and USA Staffing Cognos.</p> <p>Activity #6: Revised Completion Date 9/30/2017</p> <p>DHS released its EEO ADR Program Directive Number 065-04 on December 12, 2016. The Directive states that full participation by managers and supervisors in ADR is required. A DHS ADR brochure was prepared, is under review, and is expected to be published in FY 2017.</p> <p>CRCL continues to lead the DHS ADR Manager's Council. Each Component, along with the OCHCO, is represented on the Council. The ADR Council oversees the effectiveness of the DHS ADR Shared Neutrals program, establishes certification for mediators on the shared neutrals roster, and provides oversight for the cadre of collateral duty mediators.</p> <p>During FY 2016, the DHS ADR program added 22 mediators to the ADR Shared Neutrals Roster bringing the roster total to 54 collateral duty mediators. Two 90-minute refresher trainings were held, via webinar, for the mediators on the shared neutrals roster. The DHS ADR Shared Neutrals Program saw a 50 percent increase in the use of the mediators.</p>
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	<p>This increased use of the Shared Neutrals resulted in a significant cost savings to the DHS.</p> <p>Activity #7</p> <p>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.</p> <p>Component Updates</p> <p>Included by reference, per EEOC guidance.</p>
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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	Katherine Culliton-Gonzalez	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		9/30/20
12/13/2020	Based on the staffing study, prepare and submit justifications for staffing and related budget increases in CMAS.	Yes	3/31/21	

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2020	<p>CRCL partnered with the Program Analysis and Evaluation Office, OCFO, and completed the CRCL staffing model. In addition to activities listed in this Part H, Component staffing models are also in progress. CRCL anticipates having the Component staffing models completed by 6/2021.</p> <p>CRCL will have an opportunity to request the additional staff indicated as needed by the staffing model by March 2021.</p>
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 was 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	9/30/2021	

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.	9/30/2021	
9/30/2013	2.b. OCHCO, CRCL and Components will work jointly to develop DHS Component Employment Engagement Action Plans.	9/30/2021	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
FY2020	<p>Activity #1 The DHS Exit Survey transitioned to SurveyMonkey in April 2020. Currently TSA, CBP, ICE, USSS, CISA, and USCIS all maintain their own exit surveys and the other DHS Components continue to administer the DHS Exit Survey. Datasets are combined to look at overall trends. OCHCO is working with all Components to improve survey participation and content.</p> <p>Aside from retirement, the top reasons separating non-SES employees listed for leaving DHS were:</p> <ul style="list-style-type: none"> • Advancement Opportunities. • Management/Supervisor • Personal/Work-Life <p>Activity #2 The Office of Personnel Management delayed the 2020 FEVS due to the COVID-19 pandemic. Data was not available to DHS in time for this report.</p> <p>In FY 2020, DHS OCHCO met with each of the Components to review their DHS Component Engagement Action Plans and make recommendations for improvement; those plans were then finalized, signed by Component leadership, and sent forward. OCHCO has provided virtual updates to the EESC given the demands of the pandemic response, rather than continuing quarterly meetings, but we hope to begin meeting again in the new FY. In terms of the overall approach, we are in the process of finalizing written action planning guidance and subsequent training, both of which will launch in this FY.</p> <p>Activity #3 Part E covers the FY 2020 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 2020, 21 employees participated in the Department of Defense Senior Service School Master's Degree program. 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.</p> <p>DHS employees have, or will have, access to training/career development courses by means such as:</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; and

	<p>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> <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 2021 and beyond, DHS will also advertise for the SES CDP through its Employee Associations as well as the Strategic Recruitment, Diversity and Inclusion Council.</p> <p>Activity #6 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 the launch of this flagship mentoring opportunity, 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.</p> <p>In FY 2020, the DHS Mentoring Program consisted of 479 mentees; with 431 mentees providing demographic information as follows:</p> <p>Gender Indicator (Mentors/Mentees)</p> <ul style="list-style-type: none"> • Men = 226 (52.4%) • Women = 203 (47.0%) • Missing = 2 (0.6%) <p>Ethnicity/Race Indicators (Mentors/Mentees)</p> <ul style="list-style-type: none"> • White = 241 (55.9%) • Black or African American = 91 (21.2%) • Asian = 23 (5.3%) • Hispanic or Latino = 49 (11.3%) • Native Hawaiian or Other Pacific Islander = 1 (0.2%) • American Indian or Alaska Native = 7 (1.7%) • Two or More = 3 (0.6%) • Missing = 16 (3.7%) <p>Disability Indicators (Mentors/Mentees)</p> <ul style="list-style-type: none"> • Do not self-identify as disabled = 378 (87.8%) • Self-identified as IWD = 27 (6.2%) • Self-identified as IWTD = 10 (2.3%) • Missing = 16 (3.7%)
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</p>

	<p>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 that target Component and sub-Component issues. <p>Activity #3</p> <p>Part E covers the FY 2019 trigger analysis and information on Activity #3 b and c actions.</p> <p>Activity #4</p> <p>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.</p> <p>DHS employees have, or will have, access to training/career development courses by a variety of means:</p> <ul style="list-style-type: none"> • DHS's Senior Executive Service Candidate Development Program (SES CDP), advertised both internally and externally to DHS; • DHS, in partnership with SkillSoft, offers nearly 40,000 online learning resources which can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are aligned to support competencies, job roles or blended learning offerings. • The DHS Leader Development Program, which establishes required and optional development activities throughout the year for new and seasoned leaders at all levels across DHS. <p>Activity #5</p> <p>Advertising for the SES CDP occurs via email, the DHS website, and other avenues of communication. DHS will continue its outreach efforts to help ensure a diverse applicant pool for this program. In addition, DHS is developing an SES Outreach Plan 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 Associations as well as</p>
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	<p>the Strategic Recruitment, Diversity and Inclusion Council.</p> <p>Activity #6</p> <p>The DHS Mentoring Program is a formal program that provides enriching experiences through reciprocal relationships and opportunities for personal and professional growth while sharing knowledge, leveraging skills, and cultivating talent. The DHS Mentoring Program is open to all DHS federal employees. The 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</p> <p>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</p>
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	FY 2019.
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> <ul style="list-style-type: none"> • Personal or family related • Supervisor • Advancement opportunities <p>Results are based on completed exit surveys. USSS and TSA do not participate in the DHS-wide survey.</p> <p>Activity #2 The 2018 FEVS results were overall positive, with the Employee Engagement Index holding steady, and the Global Satisfaction and New IQ Indices increasing by one percentage point. DHS performed preliminary data analysis and shared the results with leadership and Components, along with the data analysis provided by the Office of Personnel Management (OPM). DHS worked intensively with the Employee Engagement Steering Committee (EESC) to develop Employee Engagement Action Plans that target Component and sub-Component issues.</p> <p>As a result of the preliminary data analysis and information gathered through listening tours, DHS leadership over the course of FY 2019 will:</p> <ul style="list-style-type: none"> • Host an all-Executives forum, in conjunction with the Secretary's Awards Ceremony to convey information to SES personnel on themes related to FEVS such as ethics and inclusive diversity. • Work with the major operational Components on implementing the engagement elements of the President's Management Agenda, including identifying and working intensively with the lowest 20 percent performing organizations to increase their employee engagement and morale. • Continue EESC focus on the effective execution of engagement action plans. <p>Activity #3 Part E covers the FY 2018 trigger analysis and information on Activity #3 b and c actions.</p> <p>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.</p> <p>DHS employees have, or will have, access to training/career development</p>

	<p>courses by a variety of means:</p> <ul style="list-style-type: none"> • DHS's Senior Executive Service Candidate Development Program (SES CDP), advertised both internally and externally to DHS; • DHS, in partnership with SkillSoft, offers nearly 40,000 online learning resources which can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are aligned to support competencies, job roles or blended learning offerings. • The DHS Leader Development Program, which establishes required and optional development activities throughout the year for new and seasoned leaders at all levels across DHS. <p>Activity #5</p> <p>Advertising for the SES CDP occurs via email, the DHS website, and other avenues of communication. DHS will continue its outreach efforts to help ensure a diverse applicant pool for this program. In addition, DHS is developing an SES Outreach Plan which will outline strategies to increase diversity in the SES cadre. In 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.</p> <p>Activity #6</p> <p>The DHS Mentoring Program is a formal program that provides enriching experiences through reciprocal relationships and opportunities for personal and professional growth while sharing knowledge, leveraging skills, and cultivating talent. The DHS Mentoring Program is open to all DHS federal employees. The Undersecretary for Management announces mentoring opportunities and training is provided to mentors. Types of mentoring include: Speed Mentoring, Flash Mentoring, Situational Mentoring, Reverse Mentoring, Group Mentoring, and Peer Mentoring. The program is evaluated, and feedback is provided on its successes, along with areas requiring improvement. The Mentoring Connection contract has been extended through March 31, 2019. In FY 2018, the DHS Mentoring programs coordinated 272 mentoring/mentee partnerships.</p> <p>492 Mentors/Mentees Total</p> <ul style="list-style-type: none"> • 272 Mentees • 220 Mentors <p>Gender Indicator (Mentors/Mentees)</p> <ul style="list-style-type: none"> • Men = 54 percent • Women = 46 percent <p>Ethnicity/Race Indicators</p> <ul style="list-style-type: none"> • White = 61 percent • Black or African American = 18 percent • Asian = 3 percent • Hispanic or Latino = 12 percent • Native Hawaiian or Other Pacific Islander = 0.4 percent • American Indian or Alaska Native = 0.4 percent • Two or More = 3 percent • Unspecified = 2 percent
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	<p>The application period for the FY 2019 Mentoring Program commenced in October 2018 and closed on November 9, 2018.</p> <p>Activity #7 Participant/Selectee Highlights from the DHS SES CDP Cohort I - VII Analysis:</p> <ul style="list-style-type: none"> • For Black/African American participation, the trend is consistently fluctuating in every other year from Cohort I to Cohort VII; Asian American participation has similar results. • Representation of White Females dropped significantly from Cohort III (25.5 percent) to 8.2 percent in Cohort IV, then back to an upward trend for the remaining Cohorts, ending in 34.5 percent in Cohort VII. • Other ERI groups reflect nominal participation rates. • Note that DHS is developing a SES Diversity Plan to address issues of underrepresentation in the SES cadres. The plan will be released in FY 2019.
FY 2017	<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</p>

	<p>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 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>
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	<p>Senior Executive Career Development Program (SES CDP) Cohort VI:</p> <ul style="list-style-type: none"> • 558 applicants applied for this cohort; • 417 (75 percent) applicants were found minimally qualified; • 147 applicants (26 percent) were selected for Structured Telephone Interviews; • 115 (21 percent) applicants were referred to hiring managers for selection; and • 51 (nine percent) applicants were selected and ratified by the Executive Review Board (including three alternates), and 50 participated/are participating in the cohort (one selectee declined participation). <p>The DHS AFD analysis included a breakdown of each part of the selection process by race, ethnicity, and gender to identify potential barriers.</p> <p>Applicant Flow Data Analysis:</p> <p>DHS received 69.6 percent (387 of 556) of the flow data records, an increase from Cohort V (FY 2016); 381 (68.5 percent of the 556) applicant records included Race and/or Ethnicity data; and Black or African American participation rates are relatively constant until the AFD Referred stage, and participation rates for Hispanic or Latino decreased at the AFD Selected stage.</p> <p>Participant Applicant Flow Data (AFD) Analysis:</p> <ul style="list-style-type: none"> • Black or African American participation rates increased since Cohort I, from 14 percent to 18 percent; • Women's participation rates increased from Cohort V to Cohort VI, from 23 percent to 34 percent; • Black Women's participation rates increased from four percent to 12 percent, • White Women's participation rates increased from 11 percent to 16 percent, • Latina Women's participation rates remained constant, and • African American men's participation rates have increased from Cohort V to Cohort VI, from four percent to six percent, respectively. <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 (PWD¹⁷) 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 2020 in the GS-1 to GS-10 grade cluster representing 9.37 percent compared to FY 2019 participation rate of 8.99 percent.

DHS continues to exceed the 12 percent goal in the GS-11 to SES grade cluster, representing 13.08 percent compared to 12.27 percent in FY 2019.

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 2020, PWTDs participated at a rate of 1.24 percent in the GS-1 to GS-10 and 1.26 percent in the GS-11 to SES grade clusters.

¹⁷ 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 comprised of the senior human capital officials in OCHCO, the DHS Components, and other lines of business. The goals are further communicated to the Components' EEO and Diversity officials and staff, to be socialized and implemented throughout the Components via human resources, EEO, Diversity practitioners, and hiring officials.

During FY 2020, DHS continued to maintain a 12 percent hiring goal for Individuals with Disabilities at all grade levels; a 2 percent hiring goal for Individuals with Targeted Disabilities at all grade levels, excluding Law Enforcement and Transportation Security Officer occupations; and a 1.5 percent hiring goal for Schedule A hires, also excluding law enforcement and transportation security officer occupations during FY 2020.

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

Section II: Model Disability Program

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

All DHS Components have identified personnel to support the following programs: Selective Placement Program, Disability Employment Program, Reasonable Accommodation Program, Operation Warfighter Program, and Section 508 Program.

Each Component maintains responsibility for servicing its workforce. Total Full Time Equivalent Employees (FTEs) are included in the counts provided in the following table.

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.	100	10	28	Laura Davis, Disability Employment Program Manager, CRCL
Answering questions from the public about hiring authorities that take disability into account	103	11	24	Laura Davis, Disability Employment Program Manager, CRCL
Processing reasonable accommodation requests from applicants and employees	30	4	74	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	51	1	16	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	William Bartlett Bush, Executive Director, Facilities and Operational Support, MGMT/FOS.
Special Emphasis Program for PWD and PWTD	10	1	103	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 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.

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”, some deficiencies were observed. CBP, FEMA, ICE, FLETC, and USCG reported certain deficiencies with the following Measures: B.4.a.1; B.4.a.2; B.4.a.5; b.4.a.7; B.4.a.8; B.4.a.9; B.4.a.10; and B.4.b. CRCL will continue to provide guidance and support to assist Components in addressing reported deficiencies.

In support of this measure, CRCL encouraged all DHS Components to utilize the Accessibility Compliance Management System (ACMS) to manage and track reasonable accommodations during FY 2020. CRCL and Component level subject matter experts continued to collaborate with OAST on the development and overall architectural design of an enhanced Accessibility Compliance Management System (ACMS 2.0). ACMS 2.0, an enterprise-wide system, available to all Components, manages, tracks, and reports all reasonable accommodation requests, including those for PAS. After DHS deployed the new system in FY 2019, reports of system issues and additional enhancements were identified and addressed in FY 2019 continuing through FY 2020. OAST and CRCL established a new workflow process to address issues and requests for enhancements. System updates were routinely conducted. The new system has a built-in reporting capability to meet all reporting and record keeping requirements mandated by 29 C.F.R § 1614.203(d)(5) and Executive Order 13164.

Section III: 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 2020, the Strategic Marketing, Outreach, and Recruitment Engagement (SMORE) enterprise system was launched for Department-wide use. Since SMORE's Go-Live on October 1, 2019, it has simplified the way OCHCO reports and analyzes recruitment activities. Over 19,000 Master Events have been imported into SMORE, allowing analysis to also be performed on historical data. The SMORE system is supplemented by two additional SharePoint sites (Recruiter's Portal and Joint Hiring Event Portal) which provides maximum data captured across the Department. SMORE Power BI reports provide live results and complex visualizations with the capability to drill down further into the data. There are three dynamic and complex main dashboards which provide 20 unique dashboards documenting our recruitment and outreach efforts across the Department. The DHS Corporate Recruitment Council (CRC) brings together key recruiting personnel from across DHS. The Council develops a "Top 25" list annually of recruiting and outreach events that target diverse populations. These events include those focused on law enforcement, which represent approximately 40 percent of the positions at DHS. During FY 2020, the CRC developed process improvements/enhancements for the SMORE, adjusted recruitment strategies as a result of COVID-19 and discussed research insights on how to attract females to our mission critical occupations. An updated memoranda of understanding (MOU) template has been developed by OCHCO and CRCL to expand the outreach and recruitment of students and recent graduates from institutions of higher education. The MOU will also be used to establish relationships with higher education associations and minority servicing institutions, focusing on DHS opportunities, including, but not limited to, internships, fellowships, temporary and permanent federal employment.

DHS is committed to creating and maintaining a workplace culture that embraces inclusive diversity as a critical business imperative that cultivates a high-performing organization. DHS has both Department-wide and Component-level Employee Associations (EAs) that are recognized to advance inclusive diversity and improve communication between employees and management across the Department. An EA is an organization comprised of members who have a common set of interests and goals who partner with the agency to achieve mission-related and human capital goals. In FY 2020, the Department distributed the "DHS is Hiring" spread-the-word brochures to EAs to enhance outreach to their members and targeted constituents to bolster awareness and participation in the hiring initiative. Examples of DHS-wide EAs include the DHS Asian American and Pacific Islander Network; DHS Employee Network; DHS PRIDE; Homeland Security Employee Association; DHS Deaf and Hard of Hearing Association; and the Middle Eastern Law Enforcement Officers Association.

DHS continues to use the Pathways Programs; the Federal Government's primary entrance point for students and recent graduates. In FY 2020, DHS hired 275 Pathways student interns, 181 recent graduates, and 15 Presidential Management Fellows, totaling 471 Pathways Programs participants. Of these, 40.7 percent identified as members of a minority racial or ethnic group, 54.1 percent were women, 6.5 percent were Individuals with Disabilities, and 2.1 percent were Individuals with Targeted Disabilities.

Since FY 2018, DHS has had a goal for Schedule A Hires that states Schedule A hires should comprise 1.5 percent of all new hires within each grade level in non-law enforcement related and non-Transportation Security Officer

(TSO) positions. In an annual IWD and IWTD Hiring Goal memo to the Department, DHS promotes the use of Schedule A Hiring Authority through the [Workforce Recruitment Program \(WRP\)](#) and the [OPM Shared List of People with Disabilities \(Bender List\)](#). In FY 2020, Schedule A hires comprised 3.4 percent of all new hires in non-law enforcement related and non-TSO positions, with an increase of 0.4 percent when compared to the 3.0 percent of Schedule A hires in FY 2019.

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

- Attended over 36 recruiting events during FY 2019 in over 25 states to attract candidates who identified as a PWD/PWTD.
- Participated in the EOP Career Expo for People with Disabilities in November 2019. DHS Recruiters, HR Staff, and Hiring Managers interacted with over 350 potential candidates with Schedule A eligibility and 30% or more Disabled Veterans covering Department-wide missions and available job opportunities. In addition to collecting resumes from potential candidates, several onsite interviews were conducted. Many candidates were encouraged to apply for current online job opportunities.
- Participated in the Virtual Ability Job Fair in July 2020. DHS Recruiters interacted with 25 potential candidates with Schedule A eligibility. The Ability organization provided a database of resumes for DHS Components to review. DHS, along with other participants, faced technical challenges in this virtual environment. The Department will explore using a virtual platform that offers the ability to sponsor large-scale Department-wide recruiting events with representation and participation of its Operational Components and Headquarters offices and directorates.
- DHS hosted two “DHS is Hiring” webinars in November 2019 and July 2020, with a targeted audience of individuals with disabilities and individuals with targeted disabilities. The webinars covered department-wide missions, DHS career opportunities, Schedule A, and 30% or more Disabled Veterans preference hiring authorities. There were also segments on effective resume writing and how to create a profile on OPM’s USAJOBS. Both webinars had over 1,000 registrants, with 500 participants using the Adobe Connect platform with 300 participating via an audio conference bridge.
- DHS provided a briefing on “Neurodiversity in the Workplace” during the Strategic Recruitment Diversity and Inclusion Council meeting to highlight the MITRE/Melwood program. This program offers support to qualified neurodivergent candidates for internship opportunities. As a result, DHS Federal Protective Service (FPS) is currently participating in the pilot program to recruit and hire neurodivergent interns. DHS CRCL and OCHCO SRDI supported FPS in identifying accommodation requirements for advance planning and coordination.
- In support of the Workforce Recruitment Program, DHS conducted phone interviews with students from the National Technology Institute of the Deaf, for the third year in a row, resulting in the ranking and rating of potential WRP candidates for both private and public sector employment opportunities.
- DHS continues to maintain strategic partnerships with national disability advocacy groups and provides Components with recruitment resources for individuals with disabilities/individuals with targeted disabilities. DHS attended recruiting events at Gallaudet University, California State Northridge, and National Technical Institute for the Deaf.
- Supported and promoted the Department of Defense Operation Warfighter Program.

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

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

permanent positions:

- 30 percent or More Disabled Veteran (5 U.S.C. § 3112; 5 C.F.R. §§ 316.302, 316.402, and 315.707)
- Schedule A Appointing Authority (5 C.F.R. § 213.3102(u))
 - TSA has its own distinct non-competitive appointment authority for hiring individuals with disabilities, that is comparable with the Schedule A Hiring Authority (HCM POLICY NO. 300-28).

To increase and promote the use of these hiring authorities, goals are established annually. In FY 2020, DHS hired 281 individuals with disabilities utilizing the Schedule A Hiring Authority, representing 3.40 percent of new hires excluding Law Enforcement and Transportation Security Officer occupations, significantly exceeding the FY 2020 goal of 1.5 percent.

Using the 30 Percent or More Disabled Veterans hiring authority, DHS hired an additional 599 individuals using authorities that take disability into account, representing 4.2 percent of all new hires.

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

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

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

Please refer to each Component's MD 715 report for its procedures on processing applicants under Schedule A and the 30 percent or More Disabled Veteran Authority.

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

Yes X No N/A

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

The Roadmap to Success training was updated during FY 2017 to include the provision of the Final Rule amending 29 C.F.R § 1614.203(d)(5), as well as other necessary revisions. DHS, CRCL awarded

funding to develop the new curriculum which is scheduled to replace this training course by 2021.

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

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

DHS Components continue to explore different avenues for reaching candidates with targeted disabilities. Feedback on targeted disability hiring and recruitment events continued to be captured within the SMORE, providing valuable information on the overall experience and success of each event, including attracting the right talent. This information also assists with benchmarking with similar activities providing a means to strengthen the Department's efforts to enhance outreach to applicants with disabilities and targeted disabilities.

DHS also uses a consolidated disability organization listserv representing more than 550 organizations to conduct targeted recruiting. The Department's goal is to attract individuals with disabilities including those who are veterans. The listserv is maintained and updated on a regular basis as new organizations are identified, and partnerships are established. DHS used the listserv to promote participation in various recruitment activities and in Department-hosted webinars.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

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

During FY 2020, DHS hired 2,040 PWDs, representing 14.28 percent of all permanent hires, an increase from 10.97 percent of the hires reported in FY 2019. PWTD represented 1.20 percent of all permanent hires.

When excluding law enforcement and transportation security officer (TSO) occupations, DHS met the 2 percent hiring goal for PWTD, representing 2.00 percent.

Schedule A hires comprised 3.4% of all new hires in non-law enforcement and non-TSO positions, an increase of 0.4% compared to the 3.0% of Schedule A hires in FY 2019.

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

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 |

A review of B6 New Hires by MCO, representing AFD from USA Staffing/Cognos and Monster Government Solutions and actual hires data from the National Finance Center via AXIS for all DHS Components was conducted. As a result, triggers existed for the following occupations out of the nine (9) DHS priority mission-critical occupations for PWD and PWTD:

PWD: Two out of nine MCOs

1896 - Border Patrol Agent: 1.33 percent were Qualified compared to 0.75 percent for Selections

1811 - Criminal Investigator: 6.29 percent were Qualified compared to 2.26 percent for Selections

PWTD: Seven out of nine MCOs

1802 - Compliance Inspection and Support: 1.29 percent were Qualified compared to .89 percent for Selections

1895 - Customs and Border Protection Officer: .51 percent were Qualified compared to .05 percent for Selections

1896 - Border Patrol Agent: .63 percent were Qualified compared to .08 percent for Selections

1811 - Criminal Investigator: 2.80 percent were Qualified compared to .38 percent for Selections

2210 - Information Technology Management: 3.34 percent were Qualified compared to 1.46 percent for Selections

0089 - Emergency Management Specialist: 4.92 percent were Qualified compared to 1.19 percent for Selections

All the mission-critical occupations listed above, except for 2210 and 0089, have physical and or medical requirements. These physical and or medical requirements cause lower than expected selection rates for PWTD when compared to the qualified applicant pool.

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

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: Two out of Nine MCOs

0083 – Law Enforcement: Qualified 6.82 percent; Selections 5.88 percent

1802- Compliance Inspection and Support: Qualified 8.28 percent; Selections 4.67 percent

PWTDs: Seven out of Nine MCOs

0083 – Law Enforcement: Qualified 4.55 percent; Selections 0.00 percent

0089 - Emergency Management Specialist: Qualified 6.07 percent; Selections 2.40 percent

1801 - General Inspection, Investigation & Compliance: Qualified 2.33 percent; Selections 1.98 percent

1802 - Compliance Inspection and Support: Qualified 4.93 percent; Selections 0.67 percent

1895 - Customs and Border Protection Officer: Qualified 0.84 percent; Selections 0.16 percent

1896 - Border Patrol Agent: Qualified .61 percent; Selections .19 percent

210 - Information Technology Management: Qualified 4.81 percent; Selections 1.65 percent

Section 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 PWTs, have sufficient opportunities for advancement.

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

In FY 2020, CRCL launched the DHS Disability Mentoring Program Pilot. The program announcement and application process were advertised on DHS Connect, the Department's intranet site, and distributed across DHS Components. As a result, 36 employees, 18 mentor-mentee pairs (mentee/mentors), from across the department were matched to participate in the six-month pilot. CRCL successfully collaborated with other DHS offices and Components in the development and deployment of the pilot program. The DHS Disability Mentoring Program is led and managed by the CRCL Equal Employment Opportunity Division's Diversity Management Section.

B. CAREER DEVELOPMENT 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 2020, 21 employees participated in the U.S. Department of Defense Senior Service School Master's Degree programs. DHS also nominates employees to attend the Center for Homeland Defense and Security (CHDS) Master's and Executive Leaders Programs. DHS routinely promotes the use of the U.S. Office of Personnel Management's Federal Academic Alliance which provides current Federal employees with the opportunity to pursue post-secondary education at reduced tuition rates. Federal employees can take advantage of this program at their own pace to pursue or enhance their higher academic education at 15 different colleges and universities. DHS employees have, or will have, access to training/career development courses by a variety of means:

- DHS's Senior Executive Service Candidate Development Program (SES CDP), was advertised both internally and externally to DHS. Advertising for the SES CDP occurs via email, the DHS website, and other avenues of communication. DHS will continue its outreach efforts to help ensure a diverse applicant pool for this program. DHS is also developing an SES Outreach Plan that will outline strategies to increase diversity in the SES cadre. In FY 2021 and beyond, DHS will advertise the SES CDP through its Employee Associations and OCHCO's Strategic Recruitment, Diversity and Inclusion Council.
- DHS, in partnership with SkillSoft, offers nearly 40,000 online learning resources that can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are aligned to support competencies, job roles, or blended learning offerings.

- The DHS Leader Development Program establishes required and optional development activities throughout the year for new and seasoned leaders at all levels across DHS. DHS continues to use the Pathways Program the Federal government's primary entrance point for students and recent graduates. In FY 2020, DHS hired 275 Pathways student interns, 181 recent graduates, and 15 Presidential Management Fellows, totaling 471 Pathways participants. Of these, 40.7 percent identified as members of a racial minority or ethnic group, and 54.1 percent were women. Of these, 6.5 percent identified as PWDs and 2.1 percent were PWTDs.
- The DHS Mentoring Program is a formal program that provides enriching experiences through reciprocal relationships and opportunities for personal and professional growth while sharing knowledge, leveraging skills, and cultivating talent. The DHS Mentoring Program is open to all DHS federal employees. The mentoring announcement is sent by the DHS Management Directorate to all DHS employees. Training is provided to mentor applicants. The types of mentoring offered include: Speed Mentoring, Flash Mentoring, Situational Mentoring, Reverse Mentoring, Group Mentoring, and Peer Mentoring. The program is evaluated with feedback provided on its successes and areas of improvement. In FY 2020, the DHS Mentoring programs consisted of 497 mentees. Of the participants, 6.2 percent self-identified as having a disability, with 2.3 percent self-identifying as having a targeted disability.
- The newly established DHS Disability Mentoring program pilot launched in FY 2020 was developed to provide valuable career developmental opportunities for both mentors and mentees with disabilities. It also provides participants with the opportunity to learn from and network with colleagues across DHS. Participants are matched across the department, providing a forum to gain insight and perspective on the various career opportunities DHS has to offer. During FY 2020, CRCL selected 36 participants out of 47 applicants. Of the 36 mentee/mentor participants, 27.78 percent self-identified as having a disability, with 16.67 percent self-identifying as having a targeted disability. After further review, 94.44 percent of the mentee participants self-identified as having a disability, with 56 percent self-identifying as having a targeted disability. Mentor applicants were not required to self-identify as having a disability.

Career Development Opportunities	Total Participants		PWD		PWTd	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs (Pathways Intern)		275		6.5%		2.1%
Fellowship Programs (Pathways Recent Graduates)		181		6.00%		4.4%
Presidential Management Fellows		15		0.00%		0.00%
Mentoring Programs (DHS)		515		11.46%		4.47%

<i>HQ Mentoring Program (479 participants) and DHS Disability Mentoring Program Pilot (36 participants)</i>						
Coaching Programs						
Training Programs						
Detail Programs						
Other Career Development Programs DHS SES CDP	538	45	2.79%	0.00	.74%	0.00%

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, except for the SES CDP program, are not available at the Department level. DHS CRCL will continue to coordinate efforts with OCHCO and OPM to acquire access to applicant flow data as identified in the planned activities.

DHS achieved full operational capability for its talent management system (referred to as the Performance and Learning Management System, or PALMS) at six of the nine DHS Components in August 2017. OCHCO exempted FEMA, TSA, and USCG from adopting PALMS. DHS continues to identify the solution set for follow-on capability, including reporting capability such as that required for MD-715.

- DHS completed its collection of training course completion data from all Components in November 2019. In FY 2021, DHS will begin using this data with other data sets to determine its ability to produce the MD-715 report.
- DHS will continue to identify qualifying career development programs and courses that support those programs. Using data from its talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes, DHS will continue to produce a report that complies with MD-715.
- DHS will continue to include encouraging language in all career development programs to increase the participation of PWDs.

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 2020, AFD data was not available to conduct an analysis of the applicants and selections for development programs identified above by the required benchmarks. When comparing the number of selections for PWDs to the 12 percent goal and PWTDs to the 2 percent goal, neither group participated at rates expected in the programs outlined above.

C. AWARDS

- 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 (IWDs) and PWTDs (IWTDs) are not receiving awards at the expected rates when compared to the corresponding inclusion rate of PWODs (self-reported as no disability) in three of the thirteen (13) categories, including:

PWDs	Benchmark
Time-Off Awards 11 – 20 Hours PWDs Inclusion Rate: 15.47%	IWODs Inclusion Rate: 19.60%
Cash awards \$100 – \$500: PWDs Inclusion Rate: 25.46%	IWODs Inclusion Rate: 38.71%
Cash awards \$1,000 – \$1,999: PWDs Inclusion Rate: 28.50%	IWODs Inclusion Rate: 35.82%

PWTDs	Benchmark
Time-Off Awards 11 – 20 Hours PWTDs Inclusion Rate: 12.24%	IWODs Inclusion Rate: 19.60%
Cash awards \$100 – \$500: PWTDs Inclusion Rate: 32.66%	IWODs Inclusion Rate: 38.71%
Cash awards \$1,000 – \$1,999 PWTDs Inclusion Rate: 24.80%	IWODs Inclusion Rate: 35.82%

- 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	No X

Based on a review of MD-715 Table B9-1: Employee Recognition and Awards - Distribution by Disability, PWDs and PWTs are exceeding the inclusion rate benchmark for quality step increases (QSIs).

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 2020.

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	No	X	

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	

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

Qualified Internal Applicants by Senior Grade:		Relevant Applicant Pool by Senior Grade:
SES:	0.00%	N/A
GS-15:	4.54%	N/A
GS-14:	4.38%	N/A
GS-13:	3.46%	N/A

No triggers were identified for selections of PWDs within the senior grade levels. PWDs exceeded participation across all senior grades as identified below:

Selections by Senior Grade:		Qualified Internal Applicants by Senior Grade:
SES:	10.00%	0.00%
GS-15:	5.93%	4.54%
GS-14:	5.21%	4.38%
GS-13:	6.19%	3.46%

2. Does your agency have a trigger involving 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	

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

Qualified Internal Applicants by Senior Grade:		Relevant Applicant Pool by Senior
Grade:		
SES:	0.00%	N/A
GS-15:	2.09%	N/A
GS-14:	1.81%	N/A
GS-13:	1.62%	N/A

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

Selections by Senior Grade:		Qualified Internal Applicants by Senior
Grade:		
SES:	0.91%	0.00%
GS-15:	1.19%	2.09%
GS-14:	1.09%	1.81%
GS-13:	1.20%	1.62%

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving 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 X	No
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 identified a trigger for PWD new hires at the SES level when compared to the qualified applicant pool.

	Hires	Qualified Applicant Pool
New Hires to SES	7.41%	8.93%
New Hires to GS-15	16.17%	6.68%
New Hires to GS-14	9.94%	7.08%
New Hires to GS-13	15.21%	7.56%

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

a. New Hires to SES (PWTD)	Yes	No 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 identified triggers for PWTD at all senior grade levels (SES, GS-15, GS-14, and GS-13).

	Hires	Qualified Applicant Pool
New Hires to SES	0.00%	3.77%
New Hires to GS-15	2.40%	3.19%
New Hires to GS-14	0.93%	3.49%
New Hires to GS-13	2.29%	3.20%

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

- a. Executives
 - i. Qualified Internal Applicants (PWDs) Yes No N/A X
 - ii. Internal Selections (PWDs) Yes X No
- b. Managers
 - i. Qualified Internal Applicants (PWDs) Yes No N/A X
 - ii. Internal Selections (PWDs) Yes X No
- c. Supervisors
 - i. Qualified Internal Applicants (PWDs) Yes No N/A X
 - ii. Internal Selections (PWDs) Yes X No

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

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

6. Does your agency have a trigger involving 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	

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

PWTDS Executive Selections: 0.72%	PWTDS Goal: 2%
PWTDS Manager Selections: 0.66%	PWTDS Goal: 2%
PWTDS Supervisor Selections: 1.16%	PWTDS Goal: 2%

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving 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 X
b. New Hires for Managers (PWDs)	Yes	No X
c. New Hires for Supervisors (PWDs)	Yes	No X

When reviewing the selections for PWDs compared to the qualified applicant pool benchmark, no triggers were identified.

PWDs Executive Selections:	26.27%	Qualified External Applicants:	6.91%
PWDs Manager Selections:	31.15%	Qualified External Applicants:	7.86%
PWDs Supervisor Selections:	12.14%	Qualified External Applicants:	9.09%

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving 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 X	No
f. New Hires for Managers (PWTDs)	Yes X	No
g. New Hires for Supervisors (PWTDs)	Yes X	No

When reviewing the selections for PWTDs compared to the qualified applicant pool benchmark, triggers exist in all categories.

PWTDs Executive Selections:	0.85%	Qualified External Applicants:	3.27%
PWTDs Manager Selections:	2.19%	Qualified External Applicants:	3.13%
PWTDs Supervisor Selections:	1.03%	Qualified External Applicants:	4.96%

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

2. Using the inclusion rate as the benchmark, did the percentage of 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, in DHS, PWDs are exceeding the inclusion rate benchmark for both voluntary and involuntary separations.

Voluntary Separations:

PWDs Inclusion Rate: 5.20%

IWODs Inclusion Rate: 4.59%

Involuntary Separations:

PWDs Inclusion Rate: 3.48%

IWODs Inclusion Rate: 1.94%

For reporting purposes, resignation and retirement are counted as voluntary separations and reduction in force, removal, and other separations are counted as involuntary separations.

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 |
| c. | | | |

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

Voluntary Separations:

PWTDs Inclusion Rate: 6.78%

IWODs Inclusion Rate: 4.59%

Involuntary Separations

PWTDs Inclusion Rate: 3.10%

IWODs Inclusion Rate: 1.94%

For reporting purposes, resignations and retirement are counted as voluntary separations. Reductions in force, removal, and other separations are counted as involuntary separations.

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 2020, the Department’s DHS Exit Survey Program continued to transition. The program’s transition involved coordination and consideration of both content and administration changes, and migration from one platform to another. The DHS Exit Survey results were based on exiting employees from HQ, OIG, USCG, FLETC, FEMA and USCIS. All other Components (USSS, TSA, CBP, ICE and CISA), continued to maintain their separate Component-specific exit survey programs during FY 2020. Components with separate exit survey programs provided results to the Department for coordination and reporting purposes. The consolidated FY 2020 DHS Exit Survey yielded a 25.53 percent response rate. Of the 2,840 employees separating from service, 725 took the exit survey. Aside from retirement, representing 226 respondents, the top three reasons separating non-SES employees listed for leaving DHS were: Advancement Opportunities (10.44 percent); Supervisor/Management (10.16 percent) and Personal/Family Related (9.2 percent).

Based on available data from the DHS Exit Survey, those self-reporting as PWD were 86, or 11.81 percent, of the total survey respondents. The top three categories cited as the reason for leaving were: Supervisor/Management (12.79 percent); Personal/Family Related (10.47 percent) and Health Related (9.30 percent).

During FY 2020, an additional 34 respondents self-reported as an PWTD. This represented 4.67 percent of all respondents. Of the 35 respondents, excluding those who selected retirement as a primary factor for leaving, 14 responses were provided including:

- Health Related (4) 11.76%
- Supervisor/Management (3) 8.82%
- Job Duties/Responsibilities (3) 8.82%

DHS will continue to monitor these areas to identify any future trends.

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

While both versions of the DHS Exit Survey included responses to the newly established disability program related questions, it was insufficient to draw any conclusion. Data will be used as a baseline for future analysis.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 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 employee and applicant rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

The DHS public facing website (<https://www.dhs.gov/accessibility>) notice explains Section 508 requirements to ensure Information and Communication Technology (ICT) is accessible to individuals with disabilities, including members of the public. A section on reporting accessibility issues and/or filing a formal complaint is also included.

Specifically, the website provides:

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

If you believe that the Information and Communication Technology (ICT) used by the Department of Homeland Security does not comply with Section 508 of the Rehabilitation Act, you may file a 508 complaint by contacting Accessibility@hq.dhs.gov. To enable us to respond in a manner most helpful to you, please indicate the nature of your accessibility problem, the preferred format in which to receive the material, the web address (URL) of the material with which you are having difficulty, and your contact information.

If you wish to file a civil rights and civil liberties complaint, please use the [CRCL complaint submission process](#). If you believe that a physical facility that is designed, built, altered, or leased with Federal funds by the Department of Homeland Security does not comply with the Architectural Barriers Act (ABA), refer to the U.S. Access Board's website under [ABA Enforcement – File a Complaint](#).

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

Accessibility

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

C. REASONABLE ACCOMMODATION PROGRAM

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

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

During FY 2020, the overall average time frame for processing initial requests for reasonable accommodations was approximately 37.30 days. This does not include the average processing days for USCIS, FEMA, and TSA.

The average number of days reported by DHS Components for FY 2020 are as follows:

CBP: 56.72 Days

USCIS: *Unavailable – See Component report*

HQ: 31 Days

FEMA: *Unavailable – See Component report*

FLETC: 16.9 Days

ICE: 38 Days

TSA: *Unavailable – See Component report*

USCG: 12.6 Days

USSS: 7 Days

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

DHS is committed to providing effective reasonable accommodations to employees and applicants with disabilities. The overall average processing time for reasonable accommodation requests during FY 2020 was 37.30 days, reducing the average processing days by ten. Note: The average number of processing days does not include USCIS, TSA, or FEMA, as their data was unavailable at the time of reporting.

During FY 2020, all DHS Components continued to provide reasonable accommodation training to managers and supervisors regularly. Consistent with the new requirements outlined in EEOC's Final Rule implementing revisions to 29 C.F.R. § 1614.203(d)(5), DHS and its Components continue efforts to finalize and implement their revised reasonable accommodation and personal assistance service procedures.

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

During FY 2020, CRCL awarded funding to OPM's USA Learning to develop a new training course to replace the DHS *Employment of People with Disabilities: A Roadmap to Success*. This training was the first of its kind in the Federal sector and was soon followed by OPM's version *A Roadmap to Success: Hiring, Retaining, and Including People with Disabilities*. The new course is scheduled to be fully implemented and deployed on all DHS learning management systems by the end of FY 2021. The course, mandatory for all supervisors, hiring officials, human capital and EEO professionals, must be completed within sixty (60) days of onboarding and every two years after appointment.

CRCL continued efforts to implement its revised reasonable accommodation procedures incorporating the provision of personal assistant services as an affirmative action obligation. The revised procedures are in the official DHS Directives System review process. The Department expects the review and implementation to be completed by mid-year, FY 2021. When final, DHS will submit its revised reasonable accommodation procedures to the EEOC. To educate its workforce about PAS, DHS will develop a communication strategy to socialize the RA/PAS procedures to the workforce and the public, posting the procedures on its internal and external websites.

Finally, DHS continued to partner with the Department of Defense (DoD), Computer/Electronic Accommodation Program (CAP) and the Job Accommodation Network to provide assistive technology accommodation solutions and expert consulting on disability accommodation solutions. During FY 2020, CAP provided 330 accommodations to 121 employees and conducted needs assessments for 13 employees. This resulted in a \$91,258.13 cost savings to DHS. Due to a change in program scope, effective FY 2021, CAP will no longer provide assistive technology or adaptive equipment to non-DOD agencies.

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

Pursuant to 29 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 its CRCL Connect Page, advising of its responsibility to provide personal assistance services (PAS). The language reads: "Consistent with the EEOC's guidance until further notice, requests for Personal Assistance Service (PAS) will be processed under reasonable accommodations procedures." A link to the EEOC guidance on providing PAS was also added. This Department issued guidance is now posted to DHS's public (internet) webpage at the following URL: <https://www.dhs.gov/reasonable-accommodations-dhs>.

In FY 2018, DHS revised its existing Reasonable Accommodation procedures to include the provision of PAS. The initial draft was submitted to the EEOC for review as required and sent to its raprocedures@eeoc.gov mailbox on September 28, 2018. Feedback and recommendations received

from the EEOC were incorporated. The revised procedures are in the official DHS Directives System with the review to be completed by mid- FY 2021. When final, DHS will submit its revised reasonable accommodation procedures to the EEOC. To educate its workforce about PAS, DHS will develop a communication strategy to socialize the RA/PAS procedures to the workforce and the public, posting the procedures on its internal and external websites.

Section 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 2020, DHS had a lower percentage of PWDs who filed a formal EEO Complaint (19.1 percent) alleging harassment, as compared to the government-wide average of 20.82 percent. In FY 2020, DHS had 34 settlement agreements and eight findings alleging harassment based on disability. Corrective measures taken include:

- Post notice
- Conduct EEO training
- Back Pay
- Pay attorney's fees
- Pay compensatory damages
- Provide list of funded positions
- Restoration of leave
- Pay lost overtime hours
- Remove documentation of discipline

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of 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 2020, DHS had a lower percentage of PWDs who filed a formal EEO Complaint (9.81 percent) alleging failure to provide a reasonable accommodation compared to the government-wide average of 14.02 percent.

DHS had 31 settlement agreements, a slight increase compared to FY 2019, with two findings of failure to provide a reasonable accommodation based on disability during FY 2020. Corrective measures taken included:

- Post notice
- Conduct EEO training
- Expungement of termination
- Placement in a position
- Consider disciplinary action against the supervisor
- Provide opportunity to submit a request for attorney's fees

Section 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 X No
2. Has the agency established a plan to correct the barrier(s) involving PWDs and/or PWTDS?
Yes X No N/A
3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments.

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 2020 Update: B1 – Total Permanent Workforce DHS experienced an increase of 1,447 employees from FY 2019 to FY 2020 for PWDs, representing 11.71 percent, a ratio increase of 0.70 percent, the highest of every group. PWTDs experienced a slight decrease of -2 employees, representing 1.25 percent, a ratio decrease of -0.01 percent.</p> <p>DHS New Hires for PWDs represented 14.43 percent, exceeding the goal of 12 percent, and PWTDs represented 1.20 percent, slightly below the 2 percent goal.</p> <p>DHS experienced an overall increase in Separation rates compared to FY 19. PWDs separated at a rate of 14.43 percent, significantly above 11.87 percent in FY 2019, and PWTDs separated at a slightly higher rate of 1.76 percent, compared to 1.58 percent in FY 2019.</p> <p>-----</p> <p>FY 2019 Update: B1 – Total Permanent Workforce (2.0 version)</p>

		<p>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>-----</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 2020 Update 462 – (Part IV) Bases and Issues Alleged in Complaints Filed: DHS experienced a slight decrease from 129 in FY 2019 to 126 in FY 2020 in total number of complaints alleging failure to accommodate resulting in a decrease percent change of -2.33 percent.</p> <p>DHS experienced a slight increase from 209 in FY 2019 to 244 in FY 2020 in the total number of complaints alleging harassment based on disability resulting in a percent change of 16.75 percent.</p> <p>FY 2019 Update 462 – (Part IV) Bases and Issues Alleged in Complaints Filed: Slight increase from 112 in FY 2018 to 129 in FY 2019 in total number of complaints alleging failure to accommodate resulting in a percent change of 15.18% percent. DHS continues to experience incremental increases.</p>

		<p>DHS experienced a decrease from 223 in FY 2018 to 209 in FY 2019 in the total number of complaints alleging harassment based on disability resulting in a percent change of -6.28 percent.</p> <p>No FEAR Act Report (FY 2019) – Complaints based on disability increased in the last six years (FY 2014 – FY 2019) from 13.60 percent of all complaints to 17.20 percent of all complaints in FY 2019. During FY 2019, for the first time, disability discrimination was the second-most alleged basis. Disability discrimination was alleged in 480 complaints, which is a six percent increase over the prior year when disability discrimination was raised in 477 complaints.</p> <p>Considering complaints by issue, complaints based on “reasonable accommodation” ranked sixth out of twenty-four issues during FY 2019 compared to seventh in FY 2018.</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 32 in FY 2019, none of which resulted in a finding of discrimination.</p>
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	<p>FY 2020 462 Report Update – DHS had a slight increase in the total number of settlements based on disability harassment when compared to 47 in FY 2019 to 49 in FY 2020.</p> <p>Similarly, the number of settlements based on failure to accommodate also experienced a slight increase, representing 39 in FY 2020 compared to 31 during FY 2019.</p> <p>During FY 2020, DHS had 9 findings based on disability harassment and five findings based on failure to accommodate.</p>

		<p>DHS continues to remain under the government-wide average for both types of complaints filed by PWDs for the second year in a row.</p> <p>FY 2019 462 Report Update – DHS had an overall decrease in the total number of settlements based on disability harassment when compared to FY 2018, from 63 to 47 during FY 2019 and 34 in FY 2020. The number of findings reflecting one in FY 2019 and eight reported for FY 2020.</p> <p>Similarly, the number of settlements based on failure to accommodate also decreased significantly, from 48 in FY 2018 to 31 during FY 2019, FY 2020. The number of findings increased by one, from two in FY 2018 to three in FY 2019 and decreasing in FY 2020 to two.</p> <p>DHS continues to remain under the government-wide average for both types of complaints filed by PWDs for the second year in a row.</p>
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	Yes	<p>FY 2020 Update DHS Exit Survey The DHS Exit Survey results exclude TSA, USSS, CBP, CISA and ICE. Due to continued transition efforts, the exit survey process has resulted in increased decentralization of efforts. Upon completion of the migration of the DHS Exit Survey to a new platform, the Department anticipates it will be better positioned to consolidate FY 2021 exit survey data received from any source. Component specific data can be gleaned from Component level reports. Based on data available for FY 2020, covering April through September 2020, there was a slight deviation in the top three primary reasons for IWDs separating from DHS. The top three reasons cited were: 1) Health Reasons; 2) Personal or Family Related; and 3) Advancement Opportunities/Geographic Location/ and</p>

		<p>Supervisor/Management, all coming in 3rd place.</p> <p>With the addition of “health reasons” for both groups, PWDs and PWTDs, DHS will continue to monitor that cited reason. The Department surmises there is a direct correlation between “separation for health reasons” and “the high percentage of positions with medical and physical requirements.”</p> <p>FY 2020 exit survey results now include specific data on the newly established disability program questions. DHS will use the FY 2020 responses to these questions as a baseline for future analysis.</p> <p>FY 2019 Update DHS Exit Survey – DHS (excluding 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 available data, there was a slight deviation in the top three primary reasons for IWDs separating from DHS. The top three reasons cited were: 1. Health Reasons; 2. Personal or Family Related; and 3. Advancement Opportunities/Geographic Location/ and Supervisor/Management, all coming in 3rd. The Department surmises there is a direct correlation between “separation for health reasons” and “the high percentage of positions with medical and physical requirements.”</p> <p>FY 2018 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: 1. Supervision/Management –11.63 percent, 2. Advancement Opportunities – 11.63 percent and 3. Personal/Family Related – 8.84 percent The top reasons mentioned above are the</p>
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		<p>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>The data revealed a 4.18 percent response rate for employees self-identifying as having a targeted disability.</p> <p>Of the respondents who indicated they had a targeted disability, the top three reasons for leaving included:</p> <ol style="list-style-type: none"> 1. Advancement Opportunities – 11.11 percent; 2. Supervision/Management – 11.11 percent; and 3. Geographic Location and Salary Pay (tied) – 9.52 percent <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 2020 - Utilization Analysis by Grade Cluster (Perm)</p> <p>For the second consecutive year, 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 9.37 percent (below 12 percent)</p> <p>PWDs Grade Cluster 11-SES 13.08 percent (above the 12 percent goal)</p> <p>Slight decreases were reported for PWTDs in the GS-1- GS-10 cluster and no change in the GS-11-SES cluster:</p> <p>PWTDs Grade Cluster 1-10 1.24 percent (below 2 percent)</p> <p>PWTDs Grade Cluster 11 – SES 1.26 percent (below 2 percent)</p> <p>FY 2019 - 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: PWDs Grade Cluster 1-10 8.99 percent (below 12 percent) 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) PWTDS Grade Cluster 11 – SES 1.26 percent (below 2 percent)</p> <p>-----</p> <p>FY 2018 Utilization Analysis by Grade Cluster (Perm) PWDs Grade Cluster 1-10 8.73 percent (below 12 percent) 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) 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 (<i>Employment of People with Disability: A Roadmap to Success Training</i>)	Yes	09/30/2021	
03/30/2018	Develop mid-year reporting requirements to monitor Component progress with implementing the revised rule on 29 C.F.R. § 1614.203(d)(5).	Yes		3/08/2018
09/30/2018	Collaborate with OCHCO to revise DHS's standard language on all vacancy announcements to encourage applicants with disabilities to apply, to clearly explain the Schedule A process	Yes	09/30/2019	4/18/2019

	and information on requesting reasonable accommodations.			
09/30/2018	Revise Reasonable Accommodation procedures to include procedures for providing Personal Assistance Services.	Yes	06/30/2021	
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 the Department's Affirmative Action plan for Individuals with Disabilities to the DHS website internally (DHS Connect) and externally (DHS.gov).	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	2/20/2021	
04/01/2019	Develop a bi-annual report to monitor Components' progress toward increasing the participation of PWDs and PWTDs in Mission Critical Occupations.	Yes	6/30/2021	
Fiscal Year	Accomplishments			
2017	N/A - Newly established.			
2018	<p>Hiring Goals:</p> <p>During FY 2018, DHS set a 12 percent hiring goal for Persons with Disabilities (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.</p> <p>As a result of these goals, 10.4 percent of new hires were PWDs and 1.7 percent were PWTDs in non-law enforcement and non-TSO positions. While the Department did not meet the new hire goals listed above in these two areas, it should be noted that DHS ended FY 2018 with PWDs representing 10.5 percent of the total workforce and PWTDs representing 2.4 percent, both increases from FY 2017 (9.9 percent and 2.1 percent, respectively). In addition, Schedule A hires constituted 1.6 percent of all new hires in non-law enforcement related and non-TSO positions, exceeding the goal and increasing by 35 percent from FY 2017.</p> <p>To support and expand DHS's outreach and recruitment, SRDI, in coordination with CRCL, began compiling a listserv of all disability organizations that will be maintained and distributed on an annual basis to all DHS Components. The listserv will be finalized in FY 2019 for distribution</p>			

	<p>and will include disability organizations such as America Job Centers, Veteran’s Vocational Rehabilitation and Employment Program, Centers for Independent Living and Employment Network providers.</p> <p>Disability Training: The Roadmap to Success training was updated during FY 2017 and FY 2018 to include the provision of amended 29 C.F.R. § 1614.203(d)(5), as well as other necessary revisions and updated resources. DHS plans to revise this training course by FY 2020.</p> <p>Mid-Year Reporting Requirements: 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.</p> <p>Revise DHS Standard Language on All Vacancy Announcements: CRCL initiated coordination efforts with OCHCO Policy and Programs with the recommendation of adding standard language to vacancy announcements to encourage persons with disabilities to apply. During FY 2018, DHS updated template language that is still under review by OPM. DHS CRCL in partnership with OCHCO will continue efforts to ensure effective implementation by the end of FY 2019.</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. DHS (Department-level), U.S. Coast Guard, the Transportation Security Administration, and U.S. Secret Service submitted either a draft or their final revised procedures to the 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 its Components to submit their updated reasonable accommodation procedures 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 DHS 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>
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	<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 of the AAP 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> <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.</p> <p>Revise Reasonable Accommodation and Personal Assistance Services Procedures: In furtherance of DHS efforts to implement approved revised reasonable accommodation procedures to include procedures for processing personal assistance services consistent with the new obligations outlined in amended 29 C.F.R. § 1614.203(d)(5), CRCL continued to coordinate 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</p>

	<p>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.</p> <p>Develop a bi-annual Mission Critical Occupations report to monitor participation of PWDs and PWTDs:</p> <p>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 of the participation of PWDs and PWTDs in the DHS workforce.</p>
2020	<p>Disability Training:</p> <p>DHS revised and expanded its DHS Roadmap to Success training module. CRCL secured funding and contracted with OPM USALearning to develop an e-learning course on creating, promoting, and sustaining a model disability employment program. Powertrain will support the development of a new disability training module to replace the DHS Roadmap to Success training. This training will be mandatory for all supervisors, managers, Human Capital and EEO professionals. The period of performance is from August 2020 to August 2021, with full implementation on all DHS learning management systems by September 30, 2021.</p> <p>Revise Reasonable Accommodation and Personal Assistance Services Procedures:</p> <p>In furtherance of DHS efforts to implement approved revised reasonable accommodation procedures to include procedures for processing personal assistance services consistent with the new obligations outlined in amended 29 C.F.R. § 1614.203(d)(5), CRCL continued to coordinate and adjudicate Office of General Counsel's comments and reviews during FY 2020. The Department's draft revision to Instruction Number 259-01-001, which implements DHS procedures for facilitating reasonable accommodation and personal assistant services requests continues in the official DHS Directives System review process. CRCL anticipates fully approved and vetted procedures to be finalized by the end of second quarter in FY 21. Upon</p>

	<p>finalization, DHS will resubmit revisions to EEOC as required and will develop a communication strategy to socialize the RA/PAS procedures to the workforce and public, posting on both internal and external websites.</p> <p>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:</p> <p>The target date for this planned activity has been modified. DHS will seek additional guidance and explore best practices from OPM and other agencies on options available to support this effort during FY 2021. Until this is accomplished, OCHCO will:</p> <ul style="list-style-type: none"> • Ensure that employees with disabilities are made aware of various leadership development programs and have an equal opportunity to compete for all programs, including managerial, executive, and other career-enhancing programs and initiatives. • Participate in outreach/recruitment events targeted to individuals with disabilities such as Career Expo for People with Disabilities for various positions across DHS Components. • Conduct continuous resume mining from OPM's Agency Talent Portal (ATP) utilizing Schedule A hiring authority to hire individuals with disabilities and targeted disabilities. <p>Develop a bi-annual report to monitor Components' progress toward increasing the participation of PWDs and PWTs in Mission Critical Occupations:</p> <p>Modified completion date to June 30, 2021.</p> <p>The mission critical occupations by disability report will be shared with Components as a resource and sample framework to support Component level monitoring efforts of the participation of PWDs and PWTs, representing, onboard, hires, and separations within the DHS workforce.</p>
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Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

Nothing to report.

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

To be determined.

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

DHS will continue to examine and conduct barrier analysis in collaboration with OCHCO and Components. Until a barrier(s) has been identified, DHS will 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 2020 Update:</p> <p>Based on a review of MD-715 Table B9-1: Employee Recognition and Awards - Distribution by Disability, PWDs (IWDs) and PWTs (IWTs) are not receiving awards at the expected rates when compared to the corresponding inclusion rate of PWDs (self-reported as no disability) in three of the thirteen (13) categories, including: Time-Off Awards 11 – 20 Hours Cash awards \$100 – \$500: Cash awards \$1,000 – \$1,999 Section IV, C. Awards for detailed summary.</p> <p>-----</p> <p>FY 2019 Update: B9-1 (2.0) Employee Recognition and Awards Distribution by Disability - Employees with disabilities (PWDs/PWTs) 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/PWTs) 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>-----</p> <p>B13 Employee Recognition and Awards by Disability – Employees with disabilities (PWDs) are receiving awards at rates</p>

		comparable to their workforce participation rate. However, when comparing the rates of awards received by employees with disabilities to the inclusion rate, they are significantly lower than expected.
Complaint Data (Trends)	Yes	<p>FY 2020 462 Report: DHS reported six of 22 complaints were filed and four of 10 settlements were based on disability and awards during FY 2020.</p> <p>-----</p> <p>FY 2019 462 Report: DHS reported two of 17 complaints were filed and one of five settlements were based on disability and awards during FY 2019.</p> <p>-----</p> <p>FY 2018 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 Processes)	Yes	<p>FY 2020: DHS had no findings of disability discrimination based on awards.</p> <p>FY 2019: DHS had no findings of disability discrimination based on awards.</p>
Climate Assessment Survey (e.g., FEVS)	Yes	<p>FY 2019: 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>

		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.		
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, OPM)	No			
Other (Please Describe)	N/A			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2018	Collaborate with OCHCO to review recognition and awards policy, practices and procedures, and determine next steps.	Yes	09/30/2020	09/30/2020
09/30/2021	Expand review of recognition and award practices across DHS. (new)	Yes		
Fiscal Year	Accomplishments			
2017	N/A - Newly established.			
2018	<p>During FY 2018 CRCL identified initial data sources and policies and procedures at the department level to begin review. As reported 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</p>			

	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
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 Component 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, that a two-year review is due.</p> <p>Based on this process, 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 to ensure perceived or actual barriers that may be caused by DHS award policies or associated procedures are addressed.</p>
FY 2020	<p>Based on a completed review of the department’s policies and procedures previously identified and listed below, CRCL did not find any actual or perceived barriers. CRCL will continue to review data and resources both at the Department and Component levels to include “practices” as part of its individual with disabilities barrier analysis to be conducted in FY 2021.</p> <p>Policies and Procedures Reviewed:</p> <ul style="list-style-type: none"> 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

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 09/30/2021.

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 is a trigger. 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 PWTs in all programs and hires.	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
CRCL OCHCO SRDI OCHCO Reports and Analysis		
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 plans 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. CRCL 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. The SES CDP is the only program managed at the Department level in which successful completion of the program affords the candidate the opportunity to be promoted 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 planned 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</p>			

	<p>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>
FY 2020	<p>Per an EEOC technical assistance feedback letter dated October 19, 2020 this trigger is closed and will be addressed in Part H as a program deficiency.</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	Monitor 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	06/30/2021	
Fiscal Year	Accomplishments			
FY 2018	<p>During FY 2018, DHS converted a total of 157 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 55.28 percent conversion rate. Of those converted, 138 were converted non-competitively after two years of satisfactory service, 15 converted to career or career conditional before 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 Schedule A best practices. As a result, SRDI has drafted a proposed standard operating procedure which is currently in the review process.</p>			

FY 2019	<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 develop and 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>To support 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 an overview on applying for positions within DHS utilizing Schedule A, along with a list of DHS Selective Placement Program Coordinators.</p> <p>Additionally, on Tuesday, July 30, 2019, DHS hosted a webinar on recruiting and hiring individuals with disabilities and targeted disabilities. 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 their knowledge of Schedule A direct hiring authority from 34 percent prior to the webinar. Fifty-eight percent of the participants indicated they increased knowledge of the Bender program from 17 percent prior to the webinar.</p>
FY 2020	<p>During FY 2020, DHS converted a total of 170 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 45.21 percent conversion rate and an increase compared to 11 conversions in FY 2019. Of those converted, 146 were converted non-competitively after two years of satisfactory service; 19 converted to career or career conditional before two years of service, and five were converted by other means. As a result of quarterly tracking and monitoring, DHS Components continued efforts to sustain and experience incremental increases in Schedule A conversions for the last four years.</p> <p>To support increased use of Schedule A conversions, CRCL continues to monitor Schedule A conversions on a quarterly basis then share Component-level prepared reports for appropriate action. This report continues to be an effective tool for increasing coordination and tracking of</p>

	<p>conversions by offering a summary review of Schedule A employee eligibility status.</p> <p>Coordinate efforts with OCHCO to develop DHS Schedule A guidance. Due to unforeseen delays, efforts to develop and deploy DHS Schedule A Guidance were slightly delayed. OCHCO SRDI drafted a DHS Schedule A standard operating procedures document. The draft was forwarded to CRCL for review in November 2020. The target date for this activity has been modified to 06/30/2021 to provide additional time for review and coordination.</p> <p>Additionally, all DHS hiring officials (managers/supervisors) and human capital professionals are required to complete the People with Disabilities: A Roadmap to Success course within 60 days of appointment and then every two years thereafter. The Roadmap training is a comprehensive course on disability employment including the use of special hiring non-competitive authorities such as Schedule A and 30% or More Disabled Veteran appointments. As previously mentioned, because this training is a vital to support DHS' affirmative action program for individuals with disabilities and targeted disabilities, CRCL is currently in the process of developing a new training module with updated content consistent with current laws, regulations, initiatives and Executive Orders.</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 06/30/2021.

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 2020 Update: B1: Total Workforce Distribution by Disability/ Employee Loss indicates an increase when compared to FY 2019, representing 14.43 percent in FY 2020 compared to 11.87 percent in FY 2019. PWTDS also experienced an increase when compared to FY 2019, representing 1.76 percent compared to 1.58 in FY 2019.</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>FY 2019: B1: Total Workforce Distribution by Disability/ Employee Loss indicates a slight increase when compared to FY 2018, 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>FY 2018: B14 – The 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 (Corrected) Update: 462 – (Part IV) Bases and Issues Alleged in Complaints Filed: Slight increase from 112 in FY 2018 to 129 in FY 2019 in total number of complaints alleging failure to accommodate resulting in a percent change of 15.18 percent. DHS continues to experience incremental increases.</p> <p>DHS experienced a decrease from 223 in FY 2018 to 209 in FY 2019 in</p>

		<p>the total number of complaints alleging harassment based on disability resulting in a percent change of -6.28 percent.</p> <p>DHS continues to monitor complaint activity by issue for “medical examinations. Of the 32 alleged complaints during FY 2019 based on “medical examination,” 30 were based on disability (mental/physical). Of the 30 complaints, six resulted in settlements. There were no findings reported during FY 2019.</p> <p>No FEAR Act – FY 2020 Report not available at the time of reporting. DHS will continue to review every two years.</p> <p>-----</p> <p>FY 2018 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. 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)	No	<p>FY 2020 FEVS delayed due to COVID 19.</p> <p>-----</p> <p>FY 2019: 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>

		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%
		<p>-----</p> <p>FY 2018: 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>						
		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%

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	12/30/2021	
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	09/30/2021	
Fiscal Year	Accomplishments			
FY 2018	<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</p>			

	<p>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 survey to improve participation and usefulness of the data. The working group was tasked to also review off-boarding practices related to the exit survey to determine best practices for improving participation. CRCL representatives ensured consideration of disability-related questions and sought their inclusion in the final submission of established core questions. The working group planned to achieve the goals outlined above and to begin implementation by April 2019.</p> <p>The target date for completion on this activity was scheduled to be extended for two years to allow DHS to obtain reliable data to determine why employees with disabilities were 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 in FY 2019. Two additional Components implemented Component specific exit surveys, further decentralizing the exit survey program within DHS.</p> <p>Additional efforts during FY 2019 included adding three additional disability-related questions to the DHS Survey. The same questions were shared with the Components who administer their own exit surveys. As a result of the coordinated efforts of CRCL and OCHCO, the questions now include:</p> <p>1. DHS proactively supports efforts to improve the recruitment, hiring, advancement, and retention of individuals with disabilities.</p> <p><i>Matrix scale:</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>Followed by an optional open-ended comment box</i>						
2. DHS takes appropriate steps to ensure accessibility (technology and facility) requirements are met for qualified individuals with disabilities.						
<i>Matrix scale:</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>					
<i>Followed by an optional open-ended comment box</i>						
3. DHS takes appropriate steps to ensure reasonable accommodation and/or Personal Assistance Services are provided to qualified individuals with disabilities.						
		<i>Strongly Disagree</i>	<i>Disagree</i>	<i>Neither Agree or Disagree</i>	<i>Agree</i>	<i>Strongly Agree</i>
	<i>Reasonable Accommodations</i>					
	<i>Personal Assistance Services</i>					
<i>Followed by an optional open-ended comment box</i>						
Explore feasibility of implementing new retention programs specifically for PWDs and PWTDs.						
CRCL developed a plan to implement a DHS Disability Mentoring Program. Current plans are to implement a six-month program pilot during FY 2020, that will be modeled upon the CRCL DHS Women in Law Enforcement Mentoring Program launched in 2019.						
CRCL continues to promote the DHS Headquarters Mentoring program and all other career development programs including the recently launched Supervisory Leadership Bridges Self Development Program, which is open to employees with a minimum of one-year employment in DHS and who are in the GS-11 – GS-13 grade levels in the 1801, 1811, 0132, 0301, 0343, and 2210 occupational series. This program is an innovative approach to providing employees across the Department with a flexible developmental path that targets important aspects of supervisory leadership. This program addresses a curated set of essential leadership competencies and integrates virtual learning resources and experiential developmental activities to support affirmative employment obligations.						
FY 2020	Review and analyze exit surveys to identify barriers to retention. Modified target date due to ongoing transitions during FY 2020. As a result, the DHS exit survey platform migrated from a SharePoint platform to a survey tool (SurveyMonkey) to better manage					

	<p>and track responses. Additionally, more Components have moved on to Component specific exit survey processes, further decentralizing the exit survey program within DHS.</p> <p>DHS Department-wide Exit Survey participating Components as of September 30, 2020 includes:</p> <ul style="list-style-type: none"> • DHS HQ (Includes S&T, OS, and I&A) • OIG • USCG • FLETC • FEMA • USCIS <p>Components using separate exit survey tools now includes:</p> <ul style="list-style-type: none"> • USSS • TSA • CBP • ICE • CISA <p>As of FY 2020, DHS-wide exit survey results now include specific data on the newly established disability program questions. DHS will use the FY 2020 responses to these questions as a baseline for future analysis</p>
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Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

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

To be determined.

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

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