

U.S. Department of Homeland Security
AFFIRMATIVE ACTION PLAN FOR THE RECRUITMENT,
HIRING, ADVANCEMENT, AND RETENTION OF
PERSONS WITH DISABILITIES

Fiscal Year 2023



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

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

## Section I: Efforts to Reach Regulatory Goals

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

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

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

Answer Yes

b. Cluster GS-11 to SES (PWD)

Answer No

Persons with disabilities represent 15.40 percent (30,871/200,456) of the DHS total permanent workforce. Based on the FY 2023 MD-715 utilization analysis, combining employees by GS grade level and equivalent based on salaries, DHS is exceeding the 12 percent regulatory onboard goal for PWD in the GS 11 to SES Cluster, and as a result of notable progress, we are closer to reaching the 12 percent goal in the GS-1 to GS-10 Cluster: a. Cluster GS-1 to GS-10 (PWD) 11.29% b. Cluster GS-11 to SES (PWD) 17.47% When compared to the FY 2022 onboard representation of 10.69 percent in the GS-1 to GS-10 Cluster and 17.05 percent in the GS-11 to SES Cluster, DHS is continuing to see progress in both Clusters. Consistent with OPM and EEOC, DHS expanded the DHS disability workforce to include employees who self-report as having a disability, employees with Veterans Preference codes, 03, 04, and 06, and employees who were hired under the Schedule A authority, who do not otherwise self-report as having a disability.

\*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

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

a. Cluster GS-1 to GS-10 (PWTD)

Answer Yes

b. Cluster GS-11 to SES (PWTD)

Answer Yes

Persons with targeted disabilities represent 1.30 percent (2,614/200,456) of the DHS total permanent workforce. Based on the FY 2023 MD-715 utilization analysis, combining employees by GS grade level and equivalent based on salaries, DHS has a trigger in both Clusters: a. Cluster GS-1 to GS-10 (PWTD) 1.25% b. Cluster GS-11 to SES (PWTD) 1.33% When compared to FY 2022, the percentage for PWTDs remained static in both grade Clusters.

Grade Level Cluster(GS or Alternate Pay	Total	Reportable Disability		Targeted Disability	
Planb)	#	#	%	#	%
Numarical Goal		12%		2%	
Grades GS-11 to SES	110337	8300	7.52	1446	1.31
Grades GS-1 to GS-10	15683	2033	12.96	438	2.79

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 announced on an annual basis from DHS OCHCO to all DHS Components via the Human Capital Leadership Council (HCLC). Similarly, OCHCO issues annual hiring goals for Veterans and Veterans with Disabilities. The HCLC is comprised of the senior human capital officials in OCHCO, the DHS Components, and other lines of business. These goals are 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 2023, DHS maintained a 12 percent hiring goal based on all hires (permanent/temporary) 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 (TSO) occupations; and a 2 percent hiring goal for Schedule A hires, also excluding law enforcement and transportation security officer occupations. DHS also issued a 25 percent hiring goal for Veterans and a 10 percent goal for Veterans with disabilities. In FY 2023, DHS exceeded hiring goals for PWDs at 16.6 percent and the hiring goal for PWTDs at 2.6 percent, for all (permanent/temporary) new hires, when excluding law enforcement and transportation security officer occupations. In addition, Schedule A hires constituted 3.6 percent of all new hires in non-law enforcement and non-TSO positions, exceeding the DHS goal for four consecutive years.

## Section II: Model Disability Program

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

# A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

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

Answer Yes

CRCL's Equal Employment Opportunity and Diversity Division has a full-time Departmental Disability Employment Program Manager who is responsible for implementing and maturing the DHS Disability Employment Program. Additionally, at the Department level, OCHCO's Strategic Talent Recruitment, Inclusive Diversity and Engagement (STRIDE) 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) reported by each Component (including HQ) are included in the counts provided in the following table.

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

D: 131. D	# of FTE	# of FTE Staff By Employment Status				
Disability Program Task	Full Time	Part Time	Collateral Duty	(Name, Title, Office Email)		
Special Emphasis Program for PWD and PWTD	15	1	123	Laura Davis Departmental Disability Employment Program Manager laura.davis@hq.dhs.gov		
Processing applications from PWD and PWTD	22	81	30	Laura Davis Dept. Disability Employment Program Manager laura.davis@hq.dhs.gov		
Answering questions from the public about hiring authorities that take disability into account	86	81	52	Laura Davis Departmental Disability Employment Program Manager laura.davis@hq.dhs.gov		

D: 171. D	# of FTE	Responsible Official		
Disability Program Task	Full Time	Part Time	Collateral Duty	(Name, Title, Office Email)
Processing reasonable accommodation requests from applicants and employees	35	4	76	Laura Davis (Departmental) Darlene Avery (HQ)
Architectural Barriers Act Compliance	8	17	23	Willian Bush Executive Director
Section 508 Compliance	26	3	5	Nicshan Floyd Executive Director

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

Answer Yes

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 effectively perform the duties of their positions, to include: • Quarterly Disability Employment Advisory Council meetings to share program guidance, updates, and best practices across DHS Components. • CRCL provided continuous guidance and training related to DHS disability employment trends, reasonable accommodation tools and resources, Accessibility (Section 508), recruitment and outreach, Schedule A hiring, and Service Animals and Section 504. • CRCL hosted the DHS Equal Employment and Diversity Training Conference. This three day training conference covered various topics including disability employment related workshops such as: Reassignment as a Reasonable Accommodation; Building a Successful Special Emphasis Program; Ask the Experts: Diversity, Equity, Inclusion, and Accessibility; Improving Accessibility and Usability Across the Board; Connecting the Dots: EEO, Barrier Analysis and DEIA; Workforce Successes from COVID: Increased Workforce Representation for People with Disabilities; Pregnant Workers Fairness Act; and a plenary session on the 50th Anniversary of the Rehabilitation Act of 1973. DHS Component disability program staff regularly participate in the Federal Exchange on Employment & Disability (FEED) quarterly meetings. FEED is a federal interagency working group focused on information sharing, best practices, and collaborative partnerships designed to make the Federal government a model employer of people with disabilities.

#### B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer Yes

CRCL has sufficient funding and resources to support the Department-wide disability program. Upon review of each Component's response to compliance indicators and the associated eleven measures outlined by the EEOC in the Agency Self-Assessment, progression was reported across the Department, reducing the total number of deficient measures by two. Under B.4: "The agency has sufficient budget and staffing to support the success of its EEO program", five deficiencies were noted by the following Components, compared to seven during FY 22: B.4.a.2: CISA, B.4.a.3: CBP and ICE B.4.a.7: USCG B.4.a.9: CISA B.4.a.10: CBP In support of this measure, CRCL continues to provide Components the following resources: • Accessibility Compliance Management System (ACMS) to manage and track reasonable accommodations. • Quarterly Schedule A Conversion Eligible reports. • DHS Fact Sheet on Disability Employment • DHS Fact Sheet on Schedule A Hiring Authority • DHS Fact Sheet on Personal Assistance Services • DHS Disability Mentoring Program • Annual technical assistance reviews with each Component covering MD-715, focusing on Part J • MD-715 Data Tables and ad hoc data upon request • Quarterly Disability Employment Advisory Council Meetings • Quarterly Diversity Management Section and Component Meetings Please refer to individual Component FY 23 MD 715 reports for Component-level plans and details.

# Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency		1	DHS COMPONENT DEFICIENCIES						
	3. B.4.a.10. to (CBP; FEM		ts reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]						
		1. 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)] (USSS)							
	services, w "no", please	ithin the time frame s	s all initial accommodation requests, excluding ongoing interpretative et forth in its reasonable accommodation procedures? [see MD-715, II(C)] If age of timely-processed requests, excluding ongoing interpretative services,						
	3. C.4.e.1. Im MD-715, II		ive Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d);						
			firmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If ddress in the comments. (CISA)						
			at disability-related questions from members of the public are answered CFR §1614.203(d)(1)(ii)(A)] (CISA)						
Objective			nponent activities and progress in correcting EEO program deficiencies. ctices, to assist Components in addressing						
Target Date	Sep 30, 2022								
Completion Date									
Planned Activities	Target Date Jul 31, 2024	Completion Date	Planned Activity CRCL/DMS staff meet one-on-one with each Component EEO function and review program deficiencies, actions, accomplishments, and plans						
	Jul 31, 2024		Data call to all Components for mid-year update on all Part G measures and progress made on deficiencies  Data call to all Components for end-year Parts G, H and J, including progress made on deficiencies (Part H); Consolidate into Department Part						
	Dec 1, 2024		G and compare to prior fiscal year Part G						
Accomplishments	Fiscal Year	Accomplishment Since these are ong	oing annual activities, DHS updated the Modified dates to 2024.						
	2023	<u> </u>							

Brief Description of Program Deficiency	B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]
Brief Description of Program Deficiency	C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR §1614.203(d)(3)]
Brief Description of Program Deficiency	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.
Brief Description of Program Deficiency	
Brief Description of Program Deficiency	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.
Brief Description of Program Deficiency	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)]

#### Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

#### A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

In addition to regular outreach efforts and coordination by DHS Disability Employment Program Managers and Selective Placement Program Coordinators, DHS conducts enterprise-wide recruitment efforts led by OCHCO in the following ways: SMORE: The Strategic Marketing, Outreach, and Recruitment Engagement (SMORE) enterprise system simplified the way OCHCO reports and analyzes recruitment activities. Over 35,000 Component engagements are recorded in the system, allowing analysis to be performed on current and historical data. The dashboards in the SMORE system document recruitment and outreach efforts across the Department, Additional dashboards will be developed to support the Intelligence and Cybersecurity Diversity Fellowship, Additionally, Artificial Intelligence/Machine Learning (AI/ML) are planning to be incorporated in SMORE to assist us with analyzing recruitment patterns. The DHS Corporate Recruitment Council: The DHS Corporate Recruitment Council (CRC) brings together key recruiting personnel from across DHS. The Council develops a "Top 25" list annually of recruiting and outreach events that target diverse populations and events; this includes events that are focused on law enforcement, which represent approximately 40 percent of the positions at DHS. In FY 2023, CRC members participated in 14 Department-wide recruiting and outreach events which focused on targeted skillsets which includes but is not limited to, Women in Law Enforcement, Cybersecurity, HR, and STEM. DHS Employee Associations: 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 (EA) that are recognized to advance Inclusive Diversity and improve communication between employees and management across the Department. Department-wide EA focused on disability employment include the DHS Deaf and Hard of Hearing, and the DHS Disability Alliance. In FY 2023, the Department accomplished several key initiatives to further support and empower our EAs and expand awareness of the program. Initiatives included: 1). Releasing an updated Directive and Instructions. 2). Establishing an EA Engagement Strategic Plan for the DHS Deputy Secretary to have a monthly engagement with our Department-wide EAs. 3). Implementing a requirement for Component Heads & Deputies to have quarterly engagements activities with both Department-wide and Component-specific EA's. 4).

Establishing individual EA SharePoint sites to share information on our EA missions and activities with all DHS employees. Intelligence and Cybersecurity Diversity Fellowship (ICDF) Program: DHS launched the inaugural Fellow class in May 2023. Five Components participated: CISA, USCIS, USCG, USSS, I&A. Individuals with disabilities made up 6 percent of the total 16 Fellows. During the 12-week paid Fellowship some highlights included a meet and greet with Congressman Thompson, private tour or the US Capital, meeting with Secretary Mayorkas, and weekly panels/engagement opportunities with industry leading and government SMEs. Seven Components/Lines of Business (CISA, ICE, USCG, USCIS, USSS, HQ - OCHCO, I&A) have committed 26 positions to ICDF for summer FY 2024 with recruitment starting in August 2023 and currently ongoing. ICDF Fellows are expected to onboard mid-May 2024 for a 12-week full-time internship. Secretary's Honors Program (SHP): The FY 2023 Secretary's Honors Program for Cyber launched with 53 participants and 10 participants for the Climate cohort. Of the FY 2023 SHP cohort participants, 21 percent identified as individuals with disabilities. Eight Component site tours were provided for this cohort as well as provided opportunities for the participants to attend the BlackHat conference. Components initiated the hiring process for the FY 2024 Human Resources cohort with an anticipated 41 participants. Pathways Programs: DHS continues to use the Pathways Programs, the Federal Government's primary entrance point for students and recent graduates. In FY 2023, DHS hired 272 Pathways student interns, 127 recent graduates, and 16 Presidential Management Fellows, totaling 415 Pathways Programs participants. Of the 415 program participants, 19 percent were individuals with disabilities, representing an increase of nearly 7 percent when compared to 12.11 percent in FY 2022. Hiring Goals for Schedule A: Since FY 2018, DHS has set a goal for Schedule A Hires at 2.0 percent of all new hires within each grade level in non-law enforcement and non-Transportation Security Officer (TSO) positions. In an annual PWD and PWTD Hiring Goal memo to the Department, DHS promotes the use of Schedule A Hiring Authority through the Workforce Recruitment Program (WRP). In FY 2023, Schedule A hires comprised 3.6 percent of all new hires in non-law enforcement related and non-TSO positions, a slight increase of 0.8 percent when compared to the 2.8 percent of Schedule A hires in FY 2022. Individuals with Disabilities Career Fairs: DHS maintains strategic partnerships with national disability advocacy groups and provides Components with recruitment resources for PWDs/PWTDs. In FY 2023, DHS attended recruiting events at Gallaudet University, University of North Florida, Villanova University, Little People of America Annual Conference, EOP Career Expo for People with Disabilities, and Bender Disability Virtual Career Fair. During FY 2023, DHS attended 31 unique events with multiple DHS Components attending some events concurrently. DHS has attended over 390 unique events since 2017 in all states and US Territories to attract candidates who identified as IWD/IWTD. All DHS Components have designated Selective Placement Program Managers and Disability Employment Program Managers, as well as collateral duty Special Emphasis Program Managers, who lead and support disability outreach and recruitment efforts. Key disability employment resources and programs used across DHS include: • State Vocational Rehabilitation Offices • Virginia Department for the Blind and Vision Impaired • The Workforce Recruitment Program • The Office of Personnel Management's USAJOBS Agency Talent Portal; Dice.com: ClearanceJobs.com: and LinkedIn • Veteran Affairs Vocations Rehabilitation & Employment Office • Disabled American Veterans Organization • DOD Transition Assistance Program • Component level searchable databases of eligible Schedule A and 30 Percent or More Disabled Veterans candidates (FEMA, CISA, FLETC) Disabled Veterans: DHS continues to maintain partnerships to assist with recruiting qualified disabled veterans, including: (1) collaboration with the Department of Veterans Affairs (VA) to effectively use their resources to advertise DHS job opportunities; (2) supporting VA programs such as the Non-Paid Work Experience (NPWE) program which provides the opportunity for veterans to gain valuable work experience through an internship with government agencies with the possibility for full time employment; (3) partnership with DOD's Operation Warfighter Program, which allows DHS Components to train service members in various federal occupations and have the option of hiring them as permanent DHS employees; and (4) partnership with Transition Assistance Program (TAP), which allows DHS access to military installations nationwide to offer DHS opportunities to transitioning service members. Other DHS partnerships include DOD's Hiring our Heroes initiative; Department of Labor Workforce Recruitment Program; U.S. Navy Safe Harbor Program; the Marine Corps Wounded Warrior Regiment; and college and university Reserve Officer Training Corps (ROTC) programs.

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

DHS uses the following hiring authorities to hire individuals with disabilities into temporary and permanent positions: • Veteran's Recruitment Appointment Authority, as set forth at 5 C.F.R. Part 307, including: o Veterans Preference Code 3 10-point/disability. Veteran is entitled to 10-point preference due to a service-connected disability (includes recipient of the Purple Heart medal who is not rated as having a compensable disability of 10 percent or more). o Veterans Preference Code 4 10-point/compensable. Veteran is entitled to 10-point preference due to a compensable service-connected disability of less than 30 percent. • 30 percent or More Disabled Veteran (5 U.S.C. § 3112; 5 C.F.R. §§ 316.302, 316.402, and 315.707) • Schedule A Appointing Authority (5 C.F.R. § 213.3102(u)) o TSA has its own distinct non-competitive appointment authority for hiring individuals with disabilities, which 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 for individuals with disabilities and targeted disabilities, Schedule A hires, and veterans.

In FY 2023, DHS hired 464 individuals with disabilities utilizing the Schedule A Hiring Authority, representing 3.6 percent of all new hires, when excluding Law Enforcement and Transportation Security Officer occupation hires, significantly exceeding the FY 2023 goal of 2 percent. Further supporting its disability hiring efforts, DHS hired 1,865 veterans with disabilities, representing 7.53 percent of all new hires.

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

Each DHS Component utilizes the Schedule A appointing authority (or equivalent for TSA), the 30 Percent or More Disabled Veteran authority, and other Veteran appointment authorities under VRA in which disability is a factor. Component Selective Placement Program Coordinators and Veterans Employment Program Managers are responsible for the coordination of applicants who qualify under non-competitive authorities. The Department recognizes that while it has an established policy (DHS Directive) on administering the employment of veterans, it does not have a policy covering the Schedule A Appointment Authority for Individuals with Disabilities. During FY 2021, DHS's Strategic Recruitment, Diversity, and Inclusion (SRDI) Council, after consultation with the DHS Disability Employment Program, initiated coordination with the Human Capital Policy and Programs (HCPP), to explore options of implementing departmental guidance. As a result of continued efforts during FY 2023, Schedule A guidance was developed and is now pending final concurrence and issuance by OCHCO, expected by March 2024. Please refer to each Component's MD-715 report for its procedures on processing applicants under Schedule A and the 30 percent or More Disabled Veteran Authority.

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

Answer Yes

DHS developed training for all hiring managers and human resources professionals entitled, "Employment of People with Disabilities: A Roadmap to Success." The training includes information on Schedule A hiring authority and 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. CRCL awarded contract funding to develop the new curriculum which was originally scheduled to replace this training course by 2021. CRCL extended the contract agreement to further expand the new training module to include content related to E.O. 14035, Diversity, Equity, Inclusion, and Accessibility (DEIA) in the Federal Workforce, which issued in June 2021 and focuses on disability inclusion and accessibility, and expansion of hiring and retention strategies. The Department officially rolled out the new course for deployment on all DHS learning management systems during FY 2023. To further this effort, CRCL will begin monitoring and tracking completion of the mandatory training during FY 2024 and continue to ensure training is current, relevant, and effective. In addition, each DHS 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 success of each event, including attracting the right talent. This information also assists with benchmarking similar activities, providing a means to strengthen the Department's efforts to enhance outreach to applicants with disabilities and targeted disabilities. DHS uses a consolidated disability organization listsery containing more than 550 organizations to conduct targeted recruiting by promoting participation in various recruitment activities and in Department-hosted webinars. The listsery is maintained and updated on a regular basis by CRCL as new organizations are identified, and partnerships are established. CRCL will continue efforts during FY

2024 to ensure this valuable resource remains current.

#### C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

a. New Hires for Permanent Workforce (PWD)

Answer No

b. New Hires for Permanent Workforce (PWTD)

Answer No

During FY 2023, DHS hired 3,204 PWDs, representing 16.27 percent of all permanent hires, an increase from 14.99 percent of the hires reported in FY 2022. DHS also experienced a slight increase in FY 2023 for PWTDs hires, representing 1.61 percent of permanent hires compared to 1.37 percent in FY 2022. Due to regulatory and statutory medical and physical requirements, DHS excludes law enforcement and transportation security officer (TSO) occupations when determining whether triggers exist for PWTD. Using this approach, DHS exceeded the 2 percent hiring goal for PWTD, representing 2.48 percent of permanent hires (316/12,721). Further, Schedule A hires comprised 3.67 percent of permanent new hires (467/12,721) in non-law enforcement and non-TSO positions. DHS criteria used for counting the disability workforce is consistent with OPM and EEOC guidance.

		Reportable	Disability	Targeted Disability		
New Hires	Total	Permanent Workforce	Temporary Workforce	Permanent Workforce	Temporary Workforce	
	(#)	(%)	(%)	(%)	(%)	
% of Total Applicants						
% of Qualified Applicants						
% of New Hires						

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

a. New Hires for MCO (PWD)

Answer No

b. New Hires for MCO (PWTD)

Answer No

Applicant flow data (AFD) and new hires for MCOs by disability and targeted disability for all DHS Components were reviewed (Table B6). Triggers existed for the following occupations out of the nine DHS priority mission-critical occupations for PWD and PWTD: PWD: Three out of nine MCOs 0083 - Police (Uniformed Division Officer): Qualified 0.63 percent; Selections 0.40 percent 0089 - Emergency Management Specialist: Qualified 4.12 percent; Selections 2.95 percent 2210 - Information Technology Specialist: Qualified 5.07 percent; Selections 1.49 percent PWTD: Three out of nine MCOs 0089 - Emergency Management Specialist: Qualified 1.98 percent; Selections 1.22 percent 2210 – Information Technology Specialist: Qualified 2.34 percent; Selections 0.30 percent 1811 - Criminal Investigator: Qualified 0.43 percent; Selections 0.00 percent During FY 2023, DHS experienced a shift in triggers for new hires based on disability and targeted disability among the MCO. Triggers for PWDs in MCO hires increased from two MCO to three, while triggers for PWTD dropped from four to three triggers out of the nine MCO. The 1895 - Customs and Border Protection Officer and 1896 - Border Patrol Agent occupations fell off the list for PWTD due to unavailability of AFD. Two of the four mission-critical occupations listed above have physical and or medical requirements. These physical and or medical requirements attribute to lower-than-expected selection rates for PWTD when compared to the qualified applicant pool. Note: AFD for all occupations continue to have higher than expected percentage of applicants and hires, averaging between 80 to 90 percent that are categorized under "Not Identified." Based on this observation, we are cautious of the reported triggers due to a possible data quality issue. Additionally, due to OPM restrictions on access to job AFD, AFD is only made available for job announcements that are closed and fully audited. Thus, certain MCO (1895 and 1896) AFD was not available for analysis. Lastly, AFD for FY 2023 does not include data for TSA Transportation Security Officers hires.

	Tatal	Reportable Disability	Targetable Disability
New Hires to Mission-Critical Occupations	Total	New Hires	New Hires
	(#)	(%)	(%)
Numerical Goal		12%	2%

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

a. Qualified Applicants for MCO (PWD)

Answer N/A

b. Qualified Applicants for MCO (PWTD)

Answer N/A

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

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

a. Promotions for MCO (PWD)

Answer No

b. Promotions for MCO (PWTD)

Answer No

A review of B6 Internal Competitive Promotions by MCO was conducted. AFD was derived from USA Staffing/Cognos and Monster Government Solutions for all DHS Components. Based on the AFD, triggers exist for the following occupations for PWDs and PWTDs when comparing the qualified applicant pool to the number of selections for promotions: PWDs: Four out of Nine MCOs 1801 - General Inspection, Investigation & Compliance: Qualified 2.65 percent; Selections 2.18 percent 1802 - Compliance Inspection and Support: Qualified 1.41 percent; Selections 0.85 percent 0089 - Emergency Management Specialist: 5.45 percent; Selections 4.83 percent 2210 - Information Technology Management: 8.73 percent; Selections 3.61 percent PWTDs: Three out of Nine MCOs 1802 - Compliance Inspection and Support: Qualified 0.67 percent; Selections 0.40 percent 0089 - Emergency Management Specialist: 2.02 percent; Selections 2.42 percent 2210 - Information Technology Management: Qualified 4.57 percent; Selections 1.55 percent During FY 2023, DHS experienced a shift in triggers for internal competitive promotions based on disability and targeted disability among the MCO. Triggers for PWDs in MCO hires increase from one MCO to four, while triggers for PWTDs dropped from four to three triggers out of the nine MCO. Two of the four mission-critical occupations listed above have physical and or medical requirements. These physical and or medical requirements attribute to lower-than-expected selection rates for PWTD when compared to the qualified applicant pool. Note: AFD for all occupations continue to have higher than expected percentage of applicants and internal promotions, averaging between 80 to 90 percent that are categorized under "Not Identified." Based on this observation, we are cautious of the reported triggers due to a possible data quality issue.

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

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

#### A. ADVANCEMENT PROGRAM PLAN

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

All DHS managers and supervisors are encouraged to support career advancement and development of their employees, including individuals with disabilities and individuals with targeted disabilities. CRCL continued to promote opportunities through its Disability Employment Advisory Council as well as other Special Emphasis Programs. In furtherance of Component efforts, CRCL continues to share opportunities with each Component Disability Program Manager to promote and encourage its employees with disabilities to participate in Department-wide career development and advancement programs. CRCL launched the 3rd Cohort of the DHS Disability Mentoring Program in October 2023, during National Disability Employment Awareness Month. The DHS Disability Mentoring Program is led and managed by the CRCL Equal Employment Opportunity Division's Diversity Management Section. CRCL will continue to build and expand this program in collaboration with other DHS offices and Components.

#### **B. CAREER DEVELOPMENT OPPORTUNITES**

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

The Department continues to offer various ways for employees to further their educational and professional development goals. In FY 2023, 17 employees participated in the U.S. Department of Defense Senior Service School master's degree programs, and 6 employees attended the National Intelligence University and participated in a bachelor's or master's degree program. DHS also nominated employees to attend the Center for Homeland Defense and Security Masters (23), Emergence (20), and Executive Leaders Program (14). DHS promotes the use of OPM's Federal Academic Alliance programs where employees can take advantage of various discounts from more than 38 different colleges/universities. DHS employees have, or will have, access to training/career development courses by means such as: • The DHS Senior Executive Service Candidate Development Program (SES CDP) was advertised both internally and externally to DHS. • DHS, in partnership with SkillSoft, offers nearly 40,000 online learning resources. 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 2023, DHS hired 272 Pathways student interns, 127 recent graduates, and 16 Presidential Management Fellows, totaling 415 Pathways Program participants. Of these, 19 percent identified as PWDs, and 3.60 percent were PWTDs. • The DHS Mentoring Program, open to all DHS federal employees, was designed to build and retain a diverse, well-rounded cadre of employees. The program has helped participants acquire and cultivate numerous skills including managing change, communication, leadership, and time management. Mentoring relationships benefit the mentee, as well as the mentor, and strengthens communications, trust, and collaboration across the DHS enterprise. In FY 2023, DHS continued researching a new mentoring platform to address IT security requirements that a prior vendor could not meet. In lieu of the HO Mentoring Program, DHS launched a series of speed mentoring events and mentoring-focused learning cafes to complement Component mentoring programs. These events, in conjunction with already existing career development programs, resulted in 165 mentors and 124 mentee participants, totaling 289 participants. Of the participants, 12.5 percent self-identified as having a disability, with 2.4 percent selfidentifying as having a targeted disability. • The DHS Disability Mentoring Program (DDMP), launched in FY 2020, was developed to provide valuable career developmental opportunities for both mentors and mentees with disabilities. Participants are matched across the Department, providing a forum to gain insight and perspective on the various career opportunities DHS has to offer. The third cohort, launched in FY 2023, ended during the fourth quarter of FY 2023, representing a total of 45 participants. Of the participants, 26 (100%) mentees and 13 (68%) mentors self-reported as having a disability. The fourth cohort is scheduled to be announced in October 2023 in observance of National Disability Employment Awareness Month. The DDMP does not require competition and/or supervisory recommendation/approval to participate. Therefore, it is not included in the table below. \*\*\* Data below in the training program represents the data for presidential management fellows\*\*\*

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate.

Comon Donalo manant	Total Participants		PWD		PWTD	
Career Development Opportunities	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Detail Programs						
Internship Programs		272		16.1		3.3
Fellowship Programs		127		24.4		4.7
Mentoring Programs		289		12.5		2.4
Other Career Development Programs	539	56	3.90	0.00	1.67	0.00

Comon Dovelonment	Total Participants		PWD		PWTD	
Career Development Opportunities	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Coaching Programs						
Training Programs		16		25.00		0.00

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Applicants (PWD) Answer Yes

b. Selections (PWD) Answer Yes

Detailed applicant flow data (AFD) for career development programs identified above, except for the SES CDP program, are not available at the Department level. During FY 2023, DHS implemented a new learning management system (LMS). Additional efforts were underway during FY 2023 to link the data into DHS's Tableau data system from the new LMS to ultimately provide demographic data. This work is expected to continue through FY 2024. 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 the 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 include inclusive language in all career development programs to increase the participation of PWDs. When comparing the number of selections of PWDs to the applicants in the SES CDP Program and the 12 percent goal in lieu of the relevant applicant pool benchmark for the other career development programs, triggers exist for PWD Selections in the DHS SES CDP, representing 0.0%

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Applicants (PWTD) Answer Yes

b. Selections (PWTD) Answer Yes

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 2023, AFD data was not available to conduct an analysis of the applicants and selections for career development programs identified above by the required benchmarks. When comparing the number of selections for PWTDs to the applicants (SES CDP Program) and the 2 percent goal in lieu of the relevant applicant pool, triggers exist in the following programs: PWTD Selections: - Presidential Management Fellows (0.0%) - DHS SES CDP (0.0%)

#### C. AWARDS

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

a. Awards, Bonuses, & Incentives (PWD)

Answer Yes

b. Awards, Bonuses, & Incentives (PWTD)

Answer Yes

Based on a review of MD-715 Table B9: Employee Recognition and Awards - Distribution by Disability, PWDs and PWTDs are not receiving awards at the expected rates when compared to the corresponding inclusion rate of PWODs (self-reported as no disability) in two of the thirteen (13) categories based on the PWD Inclusion rates and in three of the thirteen categories based on the PWTD Inclusion rates. This is a significant improvement for both groups when compared to six for PWD and seven for PWTD

in 2022. Triggers for FY 2023 are as follows: PWDs PWD Inclusion Rate PWOD Inclusion Rate Time-Off Awards 1 – 10 Hours: 30.72% 31.25% Cash Awards \$500 and Under: 28.02% 45.05% PWTDs PWTD Inclusion Rate PWOD Inclusion Rate Time-Off Awards 11 – 20 Hours: 11.51% 12.44% Cash Awards \$500 and Under: 32.94% 45.05% Cash Awards \$1,000 – \$1,999: 22.99% 26.05%

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	49234	30.90	24.45	31.75	30.73
Time-Off Awards 1 - 10 Hours: Total Hours	420523	230.40	208.54	228.00	230.91
Time-Off Awards 1 - 10 Hours: Average Hours	8	0.05	0.00	0.28	0.00
Time-Off Awards 11 - 20 hours: Awards Given	22689	11.85	11.82	11.54	11.91
Time-Off Awards 11 - 20 Hours: Total Hours	389389	202.63	203.05	192.46	204.78
Time-Off Awards 11 - 20 Hours: Average Hours	17	0.12	0.01	0.65	0.01
Time-Off Awards 21 - 30 hours: Awards Given	14139	8.81	7.24	9.68	8.63
Time-Off Awards 21 - 30 Hours: Total Hours	359563	223.21	184.16	247.24	218.12
Time-Off Awards 21 - 30 Hours: Average Hours	25	0.18	0.02	1.01	0.00
Time-Off Awards 31 - 40 hours: Awards Given	12636	10.39	6.26	11.34	10.19
Time-Off Awards 31 - 40 Hours: Total Hours	494056	407.31	244.47	440.18	400.35
Time-Off Awards 31 - 40 Hours: Average Hours	39	0.27	0.02	1.53	0.01
Time-Off Awards 41 or more Hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	21350	14.19	10.74	15.21	13.98
Cash Awards: \$501 - \$999: Total Amount	15879170	10602.36	7990.50	11483.86	10415.75
Cash Awards: \$501 - \$999: Average Amount	743	5.26	0.46	30.46	-0.08
Cash Awards: \$1000 - \$1999: Awards Given	51758	27.32	27.42	25.98	27.60
Cash Awards: \$1000 - \$1999: Total Amount	71901125	37766.84	38229.02	36021.46	38136.34
Cash Awards: \$1000 - \$1999: Average Amount	1389	9.74	0.87	55.91	-0.03
Cash Awards: \$2000 - \$2999: Awards Given	32178	18.63	17.28	18.48	18.67
Cash Awards: \$2000 - \$2999: Total Amount	75645095	43873.92	40628.11	43238.64	44008.41

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$2000 - \$2999: Average Amount	2350	16.59	1.46	94.39	0.12
Cash Awards: \$3000 - \$3999: Awards Given	19317	10.71	10.46	10.53	10.74
Cash Awards: \$3000 - \$3999: Total Amount	65273937	36430.93	35323.25	35676.68	36590.60
Cash Awards: \$3000 - \$3999: Average Amount	3379	23.98	2.10	136.67	0.13
Cash Awards: \$4000 - \$4999: Awards Given	6236	4.56	3.27	4.92	4.48
Cash Awards: \$4000 - \$4999: Total Amount	27218081	20027.56	14256.86	21848.00	19642.17
Cash Awards: \$4000 - \$4999: Average Amount	4364	30.95	2.72	179.06	-0.40
Cash Awards: \$5000 or more: Awards Given	6172	4.43	3.17	4.44	4.43
Cash Awards: \$5000 or more: Total Amount	43034674	29883.74	22174.04	28004.88	30281.49
Cash Awards: \$5000 or more: Average Amount	6972	47.51	4.36	254.58	3.67

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

a. Pay Increases (PWD)

Answer Yes

b. Pay Increases (PWTD)

Answer Yes

Based on a review of MD-715 Table B9-1: Employee Recognition and Awards - Distribution by Disability, PWDs and PWTDs are exceeding the inclusion rate benchmark for quality step increases (QSIs). When reviewing the inclusion rates for Performance Based Pay increases, there is a trigger for both PWD and PWTD, when compared to the PWOD Inclusion rate of 4.31%. Performance Based Pay Increases: PWD Inclusion Rate: 3.73% PWTD Inclusion Rate: 2.95%

		Reportable	Without Reportable	Targeted Disability	Without Targeted
Other Awards	Total (#)	Disability %	Disability %	%	Disability %

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

a. Other Types of Recognition (PWD)

Answer N/A

b. Other Types of Recognition (PWTD)

Answer N/A

DHS did not have any other types of recognition programs during FY 2023.

#### **D. PROMOTIONS**

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. SES

	1. Qualified Internal Applicants (PWD)	Answer	N/A
	ii. Internal Selections (PWD)	Answer	No
b. G	rade GS-15		
	i. Qualified Internal Applicants (PWD)	Answer	N/A
	ii. Internal Selections (PWD)	Answer	No
c. G	rade GS-14		
	i. Qualified Internal Applicants (PWD)	Answer	N/A
	ii. Internal Selections (PWD)	Answer	No
d. G	rade GS-13		
	i. Qualified Internal Applicants (PWD)	Answer	N/A
	ii. Internal Selections (PWD)	Answer	No

Relevant applicant pool data is not available. Internal announcements often have an area of consideration that is broader than the announcing agency. They may be government-wide to expand the applicant pool and recruit the best talent into the agency. As a result, the current DHS workforce, or a subset of it (employees in an MCO, employees at next lower grade level, and so forth), is not a relevant applicant pool. Identifying which current DHS employees would qualify for a job series they are not currently in is a difficult undertaking. Human Capital offices do not adjudicate applicant qualifications until an applicant applies for a specific position. The applicant may qualify based on experience obtained prior to entry into their current job series or DHS. DHS has not attempted to develop estimated relevant applicant pools to date. Consistent with prior practice, DHS will not attempt to tabulate relevant applicant pools for this reporting cycle. Qualified Internal Applicants by Senior Grade: Relevant Applicant Pool by Senior Grade: SES: 1.77% N/A GS-15: 4.81% N/A GS-14: 3.16% N/A GS-13: 2.90% N/A When reviewing selections for PWDs across all senior grades, triggers were identified in three of the four senior grade categories: Selections by Senior Grade: Qualified Internal Applicants by Senior Grade: SES: 5.36% 1.77% GS-15: 2.17% 4.81% GS-14: 1.87% 3.16% GS-13: 2.51% 2.90% DHS noted a higher-than-expected percentage of qualified internal applicants that were categorized as "Not Identified," for all senior grade levels (SES – GS-13) averaging 89 percent, and new hires, averaging over 90 percent. Due to this anomaly, DHS is exercising caution in reporting triggers for PWDs for internal competitive promotions in senior grade levels. DHS has submitted an inquiry to OPM USA Staffing to raise this concern and understand the anomalies within the new hires data.

2. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

Answer N/A

a. SES

i. Qualified Internal Applicants (PWTD)

i. Quantica internar ripplicants (1 W 1D)	7 His wei	1 1/ / 1
ii. Internal Selections (PWTD)	Answer	No
b. Grade GS-15		
i. Qualified Internal Applicants (PWTD)	Answer	N/A
ii. Internal Selections (PWTD)	Answer	No
c. Grade GS-14		
i. Qualified Internal Applicants (PWTD)	Answer	N/A
ii. Internal Selections (PWTD)	Answer	No

d. Grade GS-13

i. Qualified Internal Applicants (PWTD)

Answer N/A

ii. Internal Selections (PWTD)

Answer No

Relevant applicant pool data is not available. Internal announcements often have an area of consideration that is broader than the announcing agency. There may be a government-wide effort to expand the applicant pool and recruit the best talent into the agency. As a result, the current DHS workforce, or a subset of it (employees in an MCO, employees at next lower grade level, and so forth), is not a relevant applicant pool. Identifying which current DHS employees would qualify for a job series they are not currently in is a difficult undertaking. Human Capital offices do not adjudicate applicant qualifications until an applicant applies for a specific position. The applicant may qualify based on experience obtained prior to entry into their current job series or DHS. DHS has not attempted to develop estimated relevant applicant pools to date. Consistent with prior practice, DHS will not attempt to tabulate relevant applicant pools for this reporting cycle. Qualified Internal Applicants by Senior Grade: Relevant Applicant Pool by Senior Grade: SES: 0.98% N/A GS-15: 2.36% N/A GS-14: 1.31% N/A GS-13: 1.29% N/A Triggers were identified for selections of PWTDs in three of the four senior grade level categories (GS-15, 14, 13) when comparing the participation rate of selections to the percentage of qualified internal applicants. Selections by Senior Grade: Qualified Internal Applicants by Senior Grade: SES: 1.21% 0.98% GS-15: 0.79% 2.36% GS-14: 0.56% 1.31% GS-13: 0.97% 1.29% As noted above, a higher-than-expected percentage of qualified internal applicants that were categorized as "Not Identified," for all senior grade levels (SES – GS-13) averaging 89 percent, and for new hires, averaging over 90 percent. Due to this anomaly, DHS is exercising caution in reporting triggers for PWTDs for internal competitive promotions in senior grade levels. DHS has submitted an inquiry to OPM USA Staffing to raise this concern and understand the anomalies within the new hires data.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWD)

Answer No
b. New Hires to GS-15 (PWD)

Answer No
c. New Hires to GS-14 (PWD)

Answer No
d. New Hires to GS-13 (PWD)

Answer No

Compared to FY 2022, DHS has seen a significant decrease in the percentage of new hires with disabilities in senior grade levels in FY 2023. Based on a review of MD-715 B7-1 Senior Grade Level (New Hires), triggers were identified for PWD new hires at all senior grade levels when compared to the qualified applicant pool. Hires Qualified Applicant Pool New Hires to SES 0.74% 2.82% New Hires to GS-15 3.03% 4.16% New Hires to GS-14 3.01% 4.74% New Hires to GS-13 2.48% 4.77% DHS noted a higher-than-expected percentage of qualified internal applicants that were categorized as "Not Identified," for all senior grade levels (SES – GS-13) averaging 80 percent, and for new hires, averaging over 85 percent. Due to this anomaly, DHS is exercising caution in reporting triggers for PWDs. DHS has submitted an inquiry to OPM USA Staffing to raise this concern and understand the anomalies within the new hires data. New hires percentages only include those who self-identified as having a disability and does not include those appointed under authorities that take disability into account.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWTD)	Answer	No
b. New Hires to GS-15 (PWTD)	Answer	No
c. New Hires to GS-14 (PWTD)	Answer	No
d. New Hires to GS-13 (PWTD)	Answer	No

Based on a review of MD-715 B7-1 Senior Grade Level (New Hires), DHS identified a trigger for PWTD hires at the GS-13 to 14 levels when compared to the qualified applicant pool. Hires Qualified Applicant Pool New Hires to SES 2.94% 1.77% New Hires to GS-15 3.03% 1.79% New Hires to GS-14 1.20% 2.21% New Hires to GS-13 0.87% 2.19% As referenced above, DHS noted a higher-than-expected percentage of new hires that were categorized as "Not Identified," averaging over 85 percent in the GS-13 to 15 grade levels. Due to this anomaly, DHS is exercising caution in reporting triggers for PWTDs. DHS has submitted an inquiry to OPM USA Staffing to raise this concern and understand the anomalies within the new hires data.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory

positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

i. Qualified Internal Applicants (PWD)

Answer N/A

ii. Internal Selections (PWD)

Answer No

b. Managers

i. Qualified Internal Applicants (PWD)

Answer N/A

ii. Internal Selections (PWD)

Answer No

c. Supervisors

i. Qualified Internal Applicants (PWD)

Answer N/A

ii. Internal Selections (PWD)

Answer No

Relevant applicant pool data is not available. Internal announcements often have an area of consideration that is broader than the announcing agency. 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 qualified internal applicants and comparing to the 12 percent goal as an alternative comparator, triggers were identified for all supervisory levels. Similarly, triggers were also identified when comparing the selections to the qualified internal applicants in all supervisory levels. Internal Selections Qualified Internal Applicants PWD Executive: 2.00% 4.67% PWD Manager: 1.43% 1.93% PWD Supervisor: 1.13% 1.38% Again, with the higher-than-expected percentage of qualified applicants and selections that were categorized as "Not Identified," averaging over 87 percent for qualified applicants and 91 percent for internal selections by supervisory positions, DHS is exercising caution in identifying triggers for PWDs. DHS has submitted an inquiry to OPM USA Staffing to raise this concern and understand the anomalies within the new hires data.

6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

#### a. Executives

i. Qualified Internal Applicants (PWTD)

Answer N/A

ii. Internal Selections (PWTD)

Answer No

b. Managers

i. Qualified Internal Applicants (PWTD)

Answer N/A

ii. Internal Selections (PWTD)

Answer No

c. Supervisors

i. Qualified Internal Applicants (PWTD)

Answer N/A

ii. Internal Selections (PWTD)

Answer No.

Relevant applicant pool data is not available. Internal announcements often have an area of consideration that is broader than the announcing agency. There may be a government-wide effort to expand the applicant pool and recruit the best talent into the agency. As a result, the current DHS workforce, or a subset of it (employees in an MCO, employees at next lower grade level, and so forth), is not a relevant applicant pool. Identifying which current DHS employees would qualify for a job series they are not currently in is a difficult undertaking. Human Capital offices do not adjudicate applicant qualifications until an applicant applies for a specific position. The applicant may qualify based on experience obtained prior to entry into their current job series or DHS. DHS has not attempted to develop estimated relevant applicant pools to date. Consistent with prior practice, DHS will not attempt to tabulate relevant applicant pools for this reporting cycle. When reviewing the internal qualified applicants and comparing to the two percent goal as an alternative comparator, triggers were identified for PWTDs in two of the three categories. Internal Selections Internal Qualified Applicants PWTDs Executive: 0.60% 2.30% PWTDs Manager: 0.45% 0.77% PWTDs Supervisor: 0.34% 0.46% As indicated above, the higher-than-expected percentage of qualified applicants and selections that were categorized as "Not Identified," averaging over 87 percent for qualified applicants and 91 percent for internal selections by supervisory positions. Due to this anomaly, DHS is exercising caution in reporting triggers for PWTDs. DHS has submitted an inquiry to OPM USA Staffing to raise this concern and understand the anomalies within the new hires data.

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

a. New Hires for Executives (PWD)

Answer No

b. New Hires for Managers (PWD)

Answer No

c. New Hires for Supervisors (PWD)

Answer No

Compared to FY 2022, DHS has seen a significant decrease in the percentage of new hires for PWDs in supervisory positions in FY 2023. When reviewing the selections for PWDs compared to the qualified applicant pool benchmark, triggers were identified for newly hired PWDs in all supervisory positions. Selections Qualified External Applicants PWDs Executive: 3.01% 4.23% PWDs Manager: 2.02% 4.49% PWDs Supervisor: 2.63% 5.52% While triggers are noted in the summary above, DHS had a higher-than-expected percentage of qualified applicants and selections that were categorized as "Not Identified," averaging over 88 percent for qualified applicants and 94 percent for new hire selections by supervisory positions. Due to this anomaly, DHS is exercising caution in reporting triggers for PWDs by supervisory positions. DHS is exercising caution in reporting triggers for PWDs. DHS has submitted an inquiry to OPM USA Staffing to raise this concern and to better understand the anomalies within the new hires data.

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

a. New Hires for Executives (PWTD)

Answer N

b. New Hires for Managers (PWTD)

Answer No

c. New Hires for Supervisors (PWTD)

Answer No

When reviewing the FY 2023 selections for PWTDs compared to the qualified applicant pool benchmark, triggers exist for

selections in one of three categories (Supervisors), an overall improvement when compared to all categories during FY 2022. Selections Qualified External Applicants PWTDs Executive: 2.11% 1.73% PWTDs Manager: 0.81% 2.06% PWTDs Supervisor: 0.00% 1.08% While triggers are noted in the summary above, DHS had a higher-than-expected percentage of qualified applicants and selections that were categorized as "Not Identified," averaging over 88 percent for qualified applicants and 94 percent for new hire selections to supervisory positions. Due to this anomaly, DHS is exercising caution in reporting triggers for PWTDs. DHS has submitted an inquiry to OPM USA Staffing to raise this concern and to better understand the anomalies within the new hires data.

## Section VI: Plan to Improve Retention of Persons with Disabilities

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

#### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer No

Yes

During FY 2023, DHS converted a total of 217 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 45.49 percent conversion rate, representing a decrease of nearly ten percent from FY 2022. There are various reasons for not converting all eligible Schedule A employees, including lack of automated reporting, tracking, and monitoring capabilities, including notification systems at the Component level, as well as individual management discretion based on employee performance. Of those converted, 176 were converted non-competitively after two years of satisfactory service, 29 converted to career or career conditional before two years of service, with 12 converted by other means. As a result of accurate quarterly tracking and monitoring, DHS Components continued efforts have resulted in incremental improvements over the last six years in Schedule A conversions.

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

a. Voluntary Separations (PWD) Answer

b.Involuntary Separations (PWD)

Answer Yes

Based on a review of MD-715 Table B1: Total Workforce (Employee Losses) - Distribution by Disability, PWDs in the permanent workforce are exceeding the inclusion rate benchmark in both the voluntary and involuntary separations categories when compared to PWODs. Voluntary Separations: PWDs Inclusion Rate: 5.84% PWODs Inclusion Rate: 5.40% Involuntary Separations: PWDs Inclusion Rate: 1.82% For reporting purposes, resignation and retirement are counted as voluntary separations while reductions in force, removal, and other separations are counted as involuntary separations.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	12	0.01	0.01
Permanent Workforce: Removal	1425	0.85	0.64
Permanent Workforce: Resignation	6030	2.92	2.77
Permanent Workforce: Retirement	4870	2.68	2.21
Permanent Workforce: Other Separations	2655	1.68	1.19
Permanent Workforce: Total Separations	14988	8.13	6.82

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

a.Voluntary Separations (PWTD)

Answer Yes

b.Involuntary Separations (PWTD)

Answer Yes

Based on a review of MD-715 Table B14: Separations by Type of Separation - Distribution by Disability, in DHS, PWTDs in the permanent workforce are exceeding the inclusion rate benchmark for both voluntary and involuntary separations. Voluntary Separations: PWTDs Inclusion Rate: 6.73% PWODs Inclusion Rate: 5.40% Involuntary Separations: PWTDs Inclusion Rate: 9.76% PWODs Inclusion Rate: 7.22% For reporting purposes, resignations and retirement are counted as voluntary separations. Reductions in force, removal, and other separations are counted as involuntary separations.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	12	0.00	0.01
Permanent Workforce: Removal	1425	0.92	0.65
Permanent Workforce: Resignation	6030	2.41	2.79
Permanent Workforce: Retirement	4870	3.54	2.23
Permanent Workforce: Other Separations	2655	1.60	1.22
Permanent Workforce: Total Separations	14988	8.47	6.90

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

During FY 2023, the DHS Exit Survey results were based on exiting employees from CBP, CISA, HQ, FEMA, FLETC, TSA and USCG. All other Components (USSS, USCIS and CISA), continued to maintain their separate Component-specific exit survey programs. Results of exit surveys conducted by Components that did not utilize the DHS Exit Survey can be found in Componentlevel MD-715 reports or obtained from Components directly. The FY 2023 DHS Exit Survey yielded a 38 percent response rate, an increase of 58.3 percent. Of the 2,059 employees separating from the Components that use the DHS Exit Survey, 792 completed the exit survey. Of the total respondents, 129, or 16 percent, did not provide a primary reason for leaving; 99, or 12.5 percent, indicated 'Other" as a primary reason, 49, or 6 percent, indicated "retirement," and 48, or 9 percent, indicated "end of temporary position or internship." Excluding these four categories (Blank, Other, Retirement, and end of temporary position or internship), the top three reasons separating non-SES employees listed for leaving DHS were: 1st Top Reason: Supervisory/Management (15.2 percent) 2nd Top Reason: Advancement Opportunities (12.4 percent) 3rd Top Reason: Personal or Family Related (10.9 percent) Based on available data from the DHS Exit Survey, those self-reporting as PWD represented 88, or 11.1 percent, of the total survey respondents. Of the total PWD respondents, 13 or 14 percent indicated Other as a primary reason for leaving, 6 or 6.8 percent, of respondents indicated retirement, and 7 or 7.9 percent, indicated end of temporary position or internship. Excluding these three categories (Other, Retirement, and end of temporary position or internship), the top three categories cited by separating PWDs as the reason for leaving were: 1st Top Reason: Supervisor/Management (22.6 percent) 2nd Top Reason: Advancement Opportunities (16.1 percent) 3rd Top Reason: Personal or Family Related (11.3 percent) During FY 2023, 38 respondents self-reported as a PWTD. This represented 4.80 percent of all respondents. Of the total PWTD respondents, 6 or 15.8 percent, indicated Other as a primary reason for leaving, 1 or 2.63 percent, of respondents indicated retirement, and 6 or 15.8 percent, indicated end of temporary position or internship. Excluding these three categories (Other, Retirement, and end of temporary position or internship), the top three categories cited by separating PWTDs as the reason for leaving were: 1st Top Reason: Advancement Opportunities (20) percent) 2nd Top Reason: Personal or Family Related (16 percent) 3rd Top Reason: Supervisor/Management (12 percent) To assist in monitoring trends and possible triggers, DHS recommends that, along with its decentralized exit survey program efforts, each Component conduct an individualized assessment to identify any correlation to potential barriers for separating PWDs/PWTDs. As of FY 2020, the DHS Exit Survey included responses to the newly established disability-program-related questions. See chart providing a four-year trend analysis in the attached MD-715 published report. Further review of the FY 2023 Exit Survey revealed an overall decrease in positive responses from all respondents, when compared to FY 2022. Additionally, when comparing responses from PWDs and PWTDs to respondents without disabilities, there continues to be a higher percentage of negative responses (Disagree and Strongly Disagree) among those with disabilities. Specifically, when reviewing all six questions, PWDs had a 17.45 percent average difference and PWTD had a 26.33 percent average difference of negative responses, when compared to PWOD respondents. DHS will continue to monitor and expand this analysis annually.

#### B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

The DHS public facing website (https://www.dhs.gov/accessibility) notice explains Section 508 requirements to ensure Information and Communication Technology (ICT) is accessible to individuals with disabilities, including members of the public. A section on reporting accessibility issues and/or filing a formal complaint is also included. Specifically, the website provides: The Department of Homeland Security (DHS) 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, as amended (29 U.S.C. 794d) Section 508 requires agencies, during the procurement, development, maintenance, or use of ICT, to make sure 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. The Section 508 standards are the technical requirements and criteria that are used to measure conformance with the law and incorporate the W3C Web Content Accessibility Guidelines (WCAG) 2.0. More information on Section 508 and the technical standards can be found on Section508.gov. The Accessibility and Language Services Division under the DHS Customer Experience Directorate (CXD), formerly known as the Office of Accessible Systems & Technology (OAST) guides and supports all Department components in removing barriers to information access and employment of qualified individuals with disabilities in accord with the requirements of Section 508 of the Rehabilitation Act of 1973 (as amended). If you believe that the Information and Communication Technology (ICT) used by DHS does not comply with Section 508 of the Rehabilitation Act, you may file a 508 complaint by following the steps outlined on the Civil Rights and Civil Liberties Make a Civil Rights Complaint page, using the optional DHS Technology Accessibility Issue Reporting Form. For general inquiries please email Accessibility@hq.dhs.gov. To make sure we respond in a manner most helpful to you, please share the nature of your accessibility problem, the best 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 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.

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.

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.

On September 13, 2023, the Department of Homeland Security (DHS) announced the establishment of a permanent Customer Experience (CX) office to help deliver services that are simple to use, accessible, equitable, protective, transparent, and responsive for all DHS customers, including employees and applicants for employment. The Department's commitment to improving CX is a direct response to President Biden's Executive Order 14058, "Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government," which charges the federal government to reduce administrative burdens and increase equity by simplifying both public-facing and internal processes. Accessibility is now part of the DHS CX Directorate which allows Accessibility to have greater influence on building human-centric designed products and services with usability and accessibility in mind. DHS has a Department-wide standard operating procedure for processing complaints of inaccessible ICT as required by Section 508 of the Rehabilitation Act. This process and associated inquiry/complaint form is posted on DHS's Accessibility page, and CRCL's public facing web page entitled "Make a Civil Rights Complaint" (https://www.dhs.gov/file-civil-rights-complaint). DHS received and processed two complaints alleging inaccessible technology or facilities during FY 2023. Furthermore, DHS ended FY 2023 with a weighted average web accessibility score of 82 percent, representing a 9 percent increase when compared to FY 2022. The score is based on 35 public facing DHS websites with over 125,510 pages of content. The newly developed "DHS

Roadmap to Success" training for manager, supervisors, human capital and EEO professionals, was deployed in FY 23. Training incorporates learning objectives covering Section 508 and universal design to support and promote awareness and improve accessibility of technology.

#### 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 2023, the Department-wide average time frame for processing initial requests for reasonable accommodations was approximately 45.8 days, representing approximately a five-day increase in the average number of days for processing requests, when compared to FY 2022 (40.3 days). This data does not include the average processing days for USCIS. The average number of days reported by DHS Components for FY 2023 are as follows: CBP: 53.9 Days CISA: 18.2 Days USCIS: Unavailable – See Component report HQ: 24.7 Days FEMA: 56.6 Days FLETC: 8.2 Days ICE: 163 Days TSA: 64 Days USCG: 11.6 Days USSS: 12 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 timely and effective reasonable accommodations to employees and applicants with disabilities. During FY 2023, DHS had a total of 4,942 requests for reasonable accommodation due to a disability, eight (8) requests for Personal Assistance Services due to a targeted disability, and 25 requests for accommodations due to pregnancy related conditions. The overall average processing time for reasonable accommodation requests during FY 2023 was 48.5 days, an increase in the average processing days by about five days. Note: The average number of processing days does not include USCIS, as their data was unavailable at the time of reporting. Additionally, DHS processed approximately 70 percent of all requests timely based on the frames set forth in Component reasonable accommodation procedures. During FY 2023, all DHS Components continued to regularly provide reasonable accommodation training to managers and supervisors. 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 services (PAS) procedures. In support of DHS's reasonable accommodation program, CRCL and Component-level subject matter experts continue to collaborate with the Office of Accessibility & Usability (A&U) on enhancing the Accessibility Compliance Management System (ACMS). Expanding on system capabilities previously reported, and in line with Executive Order 14099 which formally rescinded the vaccine mandate, modifications were made during FY 2023 to remove references and fields covering religious and medical exemption requests to the COVID-19 Vaccination Mandate in ACMS, DHS's enterprise-wide reasonable accommodation tracking and management portal. In addition, CRCL worked with A&U to implement a strategic automated process for notifying over 17,000 employees (covering over 21,000 pending vaccine exemption requests) about E.O. 14099. As a result of DHS's coordinated efforts, nearly 95 percent, or approximately 18,000 reasonable accommodation requests for an exemption to the vaccine mandate were closed. A&U also supported CRCL's request to apply critical updates to ACMS, incorporating new fields and options for reasonable accommodation requests covering pregnancy related conditions under the Pregnant Workers Fairness Act. Effective 2nd Quarter of FY 2023, CRCL implemented a new reasonable accommodation quarterly reporting requirement for all Components. Specifically, this quarterly requirement supports the Department's Disability Employment Program, and the DHS Directive 259-01: Providing Reasonable Accommodations for Employees and Applicants with Disabilities, and associated Instructions, requiring Components to provide an annual report on their Component's reasonable accommodation program. To standardize Component reporting, CRCL developed a summary-level reporting template covering the following information: • Total Number of RA, PAS, and PWFA Requests (as of the end of each quarter) o Total Requests, Total Closed, Total Pending, Total Costs • Reasonable Accommodation Processing Timeframes o Time Frame Set forth in established procedures, Average number of processing days, and average percent of requests processed timely • Staffing and Resources to Support the Reasonable Accommodation Program o Number of FTE processing requests, Resources (systems) used to manage and track requests, Central Accommodation Funding, and RA program POCs • Status of Compliant Reasonable Accommodation Procedures o Date Submitted to EEOC (raprocedures@eeoc.gov), Date Received EEOC Approval • Procedures Posted to Internal and External Website o Requires internal and external links to procedures • Additional information (Provide relevant updates on activities taken during the quarter to support the effectiveness of the policies, procedures,

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or practices implementing the Component'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.) During FY 2023, CRCL awarded additional funding for a fourth option year to further develop the new training course which will replace the DHS Employment of People with Disabilities: A Roadmap to Success. The new course was fully deployed on all DHS learning management systems in FY 2023, with a new version release expected during FY 2024, incorporating new scenario-based content. As of FY 2023, eight of the ten DHS Components have received approval on their RA/PAS procedures from the EEOC. The remaining two Components (USSS and CISA) are anticipating finalizing revised procedures and submitting to the EEOC for approval during FY 2024. Finally, DHS continued its partnership with the Department of Defense (DoD) Computer/Electronic Accommodation Program (CAP) to provide needs assessments to DHS employees throughout DHS.

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

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

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

In FY 2021, DHS updated the CRCL Connect Page (intranet) and public (internet) webpage at https://www.dhs.gov/reasonable-accommodations-dhs, with DHS Instruction 259-01-001, Rev. 01: Providing Reasonable Accommodations for Employees and Applicants with Disabilities and Personal Assistance Services for Employees with Targeted Disabilities. In addition to posting the DHS procedures, DHS provides additional resources to its employees including EEOC guidance that assists Federal agencies in carrying out their responsibility to provide personal assistance services (PAS), and a Fact Sheet on Personal Assistance Services to educate our workforce on this affirmative action requirement. During FY 2023, eight requests for PAS were reported Department wide.

# Section VII: EEO Complaint and Findings Data

#### A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer No

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

Answer Yes

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

During FY 2023, DHS had a lower percentage of PWDs who filed a formal EEO Complaint (16 percent) alleging harassment based on disability, as compared to the government-wide average of 23.12 percent. This is an increase of nearly 4 percent when compared to FY 2022. In FY 2023, DHS negotiated 49 settlement agreements (14 mental 35 physical) and had four findings of harassment based on disability. Corrective measures taken includes: • Posting of notice • Conduct EEO training • Pay attorney's fees • Pay compensatory damages • Consider disciplinary action DHS Components retain independent authority to discipline their respective employees, including individuals found to have engaged in discriminatory, retaliatory, or harassing conduct, as set forth in findings of discrimination. As part of any relief ordered, Components were required to consider disciplinary action against any individual found responsible for discriminatory actions or conduct. During FY 2023, while not specifically based on discrimination alleging harassment based on disability status, a total of 45 employees were disciplined because of findings of discriminatory, retaliatory, or

harassing conduct. The disciplinary actions resulted from violations of Title VII.

#### B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer No.

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

Answer Yes

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

During FY 2023, DHS had a lower percentage of PWDs who filed a formal EEO Complaint (11 percent) alleging failure to provide a reasonable accommodation compared to the government-wide average of 13.79 percent. This is a decrease of 1 percent when compared to FY 2022. DHS negotiated 45 settlement agreements involving a failure to accommodate allegations and had two findings of failure to provide a reasonable accommodation based on disability during FY 2023. Corrective measures taken included:

• Posting of notice • Conduct EEO training • Pay attorney's fees • Pay Compensatory damages • Implement reasonable accommodation • Consider discipline action DHS Components retain independent authority to discipline their respective employees, including individuals found to have engaged in discriminatory, retaliatory, or harassing conduct, as set forth in findings of discrimination. As part of any relief ordered, Components were required to consider disciplinary action against any individual found responsible for discriminatory actions or conduct. During FY 2023, while not specifically based on discrimination alleging failure to provide a reasonable accommodation, a total of 45 employees were disciplined because of findings of discriminatory, retaliatory, or harassing conduct. The disciplinary actions resulted from violations of Title VII.

### Section VIII: Identification and Removal of Barriers

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

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

Answer Yes

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

Answer Yes

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

Source of the	Trigger:	Workforce Da	ata (if so identif	y the table)				
Specific Work Table:			ata Table - B1	·				
CONDITION THAT WAS A TRIGGER FOR A		Trigger # 1: Lower than expected participation for Persons with a Disability (PWD) in the grade cluster GS 1 –10 when compared to the regulatory goal of 12 percent and for Persons with a Targeted Disabilities (PWTD) in grade clusters GS-1 – GS-10 and GS-11 – SES when compared to the regulatory goal of 2 percent.						
Provide a brief narrative describing the condition at issue.								
How was the corecognized as a barrier?								
STATEMENT		Barrier Grou	ıp					
BARRIER GI	ROUPS:	People with I	Disabilities					
		People with	Targeted Disabi	ilities				
Barrier Analy Completed?:	sis Process	Y						
Barrier(s) Ide	ntified?:	Y						
STATEMENT	_	Barri	er Name	De	escription of	Policy,	Procedure, or P	ractice
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.  Not Identified  Policies, procedures, practices, and conditions that impact employees during the employment lifecycle Component level within each of the DHS Components are best equipped to conduct the barried develop the corresponding action plans. DHS Deposition to identify potential barriers and potential Component identifies a department-wide policy/protential barrier, DHS will conduct the appropriate and submit its own Part J to address the potential barrier.		ereside at the ents. As a result, er analysis and eartment-level Component's root causes. If a ocedure as a barrier analysis						
			Objective(s)	and Dates for	EEO Plan			
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed		Obj	jective Description	on
10/01/2017	09/30/2021	Yes	10/30/2023		Increase workforce participation rates of PWDs and PWTDs at all grade levels.		s of PWDs and	
			Respo	onsible Official	l(s)			
	Title			Name		St	tandards Addres	s The Plan?
Executive Dire	ector		Nicshan Floyd,	n Floyd, OAST		Yes		
Departmental Disability Employment Program Manager		Laura Davis	avis Yes					
Supervisory D&I Advisor, OCHCO		CHCO	Ginny Berry		Yes			
		Plann	ed Activities T	oward Comple	etion of Obje	ective		
Target Date	2	Planned Activities Sufficient Staffing & Date Funding?		Completion Date				
12/30/2017		al Hiring Goal roughout DHS	ls for PWDs and	l PWTDs and	Ye	s		12/27/2017

Planned Activities Toward Completion of Objective  Sufficient Modified Completion					
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date	
09/30/2018	Update DHS Disability training module for managers and HR Professionals (Employment of People with Disability: A Roadmap to Success Training)	Yes	09/30/2023	09/15/2023	
03/30/2018	Develop mid-year reporting requirements to monitor Component progress with implementing the revised rule on 29 C.F.R 1614. § 1614.203(d)(5).	Yes		03/08/2018	
09/30/2018	Collaborate with OCHCO to revise DHS standard language on all vacancy announcements to encourage applicants with disabilities to apply, and to clearly explain Schedule A process and requesting reasonable accommodations.	Yes	09/30/2019	04/18/2019	
09/30/2018	Revise Reasonable Accommodation procedures to include procedures for providing Personal Assistance Services.	Yes	06/30/2021	03/23/2021	
03/30/2018	Implement and post Affirmative Action plan for Individuals with Disabilities to the DHS website internally and externally.	Yes	07/19/2018	07/19/2018	
09/30/2018	Collaborate with OCHCO to explore the feasibility of considering disability status as a positive factor in hiring and promotions decisions to the extent permitted by law	Yes	09/30/2023	06/30/2023	
04/01/2019	Develop a bi-annual report to monitor Components progress toward increasing participation of PWDs and PWTDs within Mission Critical Occupations.	Yes	06/30/2021	09/30/2021	
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 DHS websites.	Yes		09/30/2018	

	Report of Accomplishments			
Fiscal Year	Accomplishment			
2018	Hiring Goals: During FY 2018, DHS set a 12 percent hiring goal for Persons with Disabilities (PWDs) at all grade levels; a 2 percent hiring goal for Persons with Targeted Disabilities (PWTDs) at all grade levels, excluding law enforcement and transportation security officer occupations; and a 1.5 percent hiring goal for Schedule A hires excluding law enforcement and transportation security officer occupations.  As a result of these goals, 10.4 percent of new hires were PWDs and 1.7 percent were PWTDs in non-law enforcement and non-TSO positions. While the Department did not meet the new hire goals listed above in these two areas, it should be noted that DHS ended FY 2018 with PWDs representing 10.5 percent of the total workforce and PWTDs representing 2.4 percent, both increases from FY 2017 (9.9 percent and 2.1 percent, respectively). In addition, Schedule A hires constituted 1.6 percent of all new hires in non-law enforcement related and non-TSO positions, exceeding the goal and increasing by 35 percent from FY 2017.			
	To support and expand DHS's outreach and recruitment, SRDI, in coordination with CRCL, began compiling a listsery of all disability organizations that will be maintained and distributed on an annual basis to all DHS Components. The listsery will be finalized in FY 2019 for distribution and will include disability organizations such as America Job Centers, Veteran's Vocational Rehabilitation and Employment Program, Centers for Independent Living and Employment Network providers.			
	Disability Training: The Roadmap to Success training was updated during FY 2017 and FY 2018 to include the provision of amended 29 C.F.R 1614. § 1614.203(d)(5), as well as other necessary revisions and updated resources. DHS plans to revise this training course by FY 2020.			
	Mid-Year Reporting Requirements: CRCL issued a revised mid-year reporting requirement to all DHS Components to assist with monitoring and tracking progress in establishing a Model EEO Program. The revised reporting format was modeled after the revised Part G Agency Self-Assessment, essential element program measures and trigger identification based on Part J Special Program Plan for the Recruitment, Hiring, Advancement and Retention of Persons with Disabilities. CRCL reviewed and combined all Component responses then reported on EEO programs in a composite document providing additional technical guidance where necessary.			
	Revise DHS Standard Language on All Vacancy Announcements: CRCL initiated coordination efforts with OCHCO Policy and Programs with the recommendation of adding standard language to vacancy announcements to encourage persons with disabilities to apply. During FY 2018, DHS updated template language that is still under review by OPM. DHS CRCL in partnership with OCHCO will continue efforts to ensure effective implementation by the end of FY 2019.			
	Revise Reasonable Accommodation and Personal Assistance Services Procedures:  During FY 2018, CRCL drafted revised reasonable accommodation procedures to include procedures for processing personal assistance services consistent with the new obligations outlined in Section 501 of the Rehabilitation Act. As a result, DHS (Departmental), U.S. Coast Guard, the Transportation Security Administration, and U.S. Secret Service have all submitted either draft or final revised procedures to EEOC for review and approval pursuant to Executive Order 13164, during the reporting period. CRCL will continue to monitor and track the status and progress with the remaining Components in meeting this requirement. DHS's procedures require all updated reasonable accommodation procedures to be submitted to CRCL for review prior to submission to EEOC.			
	Develop and post notice of rights under Section 508 and the Architectural Barriers Act on the internal and external websites.  During FY 2018, DHS updated its web page, e.g., internal connect page (http://dhsconnect.dhs.gov/pages/accessibility.aspx), for both accessibility and consistency to include a description of rights and how to file a complaint under Section 508.			
	Implement and post FY 2017 Affirmative Action Report and FY 2018 Plan As required, DHS posted its FY 2017 Affirmative Action Report and FY 2018 Plan on DHS' public facing website at the following location: www.dhs.gov/reports-office-civil-rights-and-civil-liberties. CRCL continues			

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

	Report of Accomplishments			
Fiscal Year	Accomplishment			
2021	Disability Training: DHS revised and expanded its DHS Roadmap to Success training module. In FY 2021, CRCL awarded additional funding for an optional year agreement to expand the newly developed curriculum with OPM USALearning. The option year agreement enables DHS to further develop the Schedule A section and add learning objectives covering disability equity, inclusion and accessibility strategies based on the recently issued Executive Order 14035, Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce. This training will be mandatory for all supervisors, managers, Human Capital and EEO professionals. The new period of performance is from August 2021 to August 2022, with full implementation on all DHS learning management systems by September 2022.			
	Revise Reasonable Accommodation and Personal Assistance Services Procedures: On March 23, 2021, DHS implemented and posted its 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).			
	Collaborate with OCHCO to explore the feasibility of considering disability status as a positive factor in hiring and promotions decisions to the extent permitted by law:  The target date for this planned activity has been extended. DHS will continue to seek guidance and explore best practices from OPM and other agencies on options available to support this effort during FY 2022. In support of DEIA efforts, CRCL recommended OPM provide additional guidance on implementing positive placement factors for hiring and promoting individuals with disabilities, in our submission of the promising practices survey. Until this activity is fully explored and consider, OCHCO will continue to:			
	<ul> <li>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.</li> <li>Participate in outreach/recruitment events targeted to individuals with disabilities such as Career Expo for People with Disabilities for various positions across DHS Components.</li> <li>Conduct continuous resume mining from OPM's Agency Talent Portal (ATP) utilizing Schedule A hiring authority to hire individuals with disabilities and targeted disabilities.</li> </ul>			
	Develop a bi-annual report to monitor Components' progress toward increasing the participation of PWDs and PWTDs in Mission Critical Occupations: Completion 09/30/2021 CRCL developed a mission critical occupation by disability report and plans to monitor from the department level then distribute on a quarterly basis to all Components via the DEAC. The report will serve as an additional resource to support Component-level monitoring efforts of the participation of PWDs and PWTDs in DHS mission critical occupations.			

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

	Report of Accomplishments						
Fiscal Year	Accomplishment						
2022	Modified Trigger Statement: For the third consecutive year PWDs are not below the 12 percent regulatory goal in the GS 11 – SES grade clusters.						
	Disability Training: (modified targeted completion date) In FY 2022, the new Roadmap to Success curriculum was finalized and ready for implementation. However, due to the decommissioning of PALMS and the transitioning to a new learning management system (LMS), the training was not fully implemented. As a result of the lack of capabilities in the existing system, CRCL awarded additional funding for 2nd option-year agreement to enhance the newly developed curriculum with OPM USA-Learning. This option year agreement includes the development and programming of a randomized built-in "test-out" and "post assessment" evaluation into the training SCORM deliverable, to ensure all learning objectives are met. CRCL took this opportunity to exceed 508 accessibility standards to add additional enhancements to the training based on research conducted for neurodiverse learners. The updated training program is expected to be fully implemented during FY 2023 if the new DHS LMS is up and running. If not, CRCL will proceed with a phased approach with Components that are not affected by the LMS transition.						
	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: (modified targeted completion date)						
	The target date for this planned activity has been extended for another year. DHS will continue to seek guidance and explore best practices from EEOC and OPM, as well as other agencies on options available. Until this activity is fully explored and consider, OCHCO will continue to:						
	<ul> <li>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.</li> <li>Participate in outreach/recruitment events targeted to individuals with disabilities such as Career Expo for People with Disabilities for various positions across DHS Components.</li> <li>Conduct continuous resume mining from OPM's Agency Talent Portal (ATP) utilizing Schedule A hiring</li> </ul>						
2023	authority to hire individuals with disabilities and targeted disabilities.  Closed/Complete						
2023	In FY 2023, DHS continued to experience an increase in both the GS-1- GS-10 and GS-11-SES Grade Clusters for PWDs, representing a five year upward trend. PWD participation in the GS 11 – SES at 17.47 percent has surpassed the onboard participation rate of 15.43 percent. Increases were also reported for PWTDs in the GS-1- GS-10 and the GS-11-SES cluster, with both clusters participating at rates close or above the onboard participation rate of 1.31%						
	Disability Training: (Complete)						
	The new "A Roadmap to Success: Disability Recruitment, Hiring, Advancement, and Retention," training curriculum was successfully implemented across all DHS Component learning management systems in FY 2023. In support of efforts to continuously enhance this mandatory training for all hiring officials and HR and EEO practitioners, CRCL awarded additional funding for a 3rd option-year agreement with OPM USA-Learning. This option year agreement covered the development and programming of three animated scenarios covering the utilization of the Schedule A Appointment Authority and improved accessible design enhancements to the overall training curriculum. The enhanced version is expected to be implemented during FY 2024. CRCL will continue to maintain and ensure updates are applied as necessary.						
	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: (Complete)						
	DHS will continue to explore innovative options to increase disability hiring and promotions. These efforts are fully supported by OCHCO, CRCL and throughout all DHS Components. CRCL will continue to provide useful resources and guidance to support hiring and advancement opportunities for employees and applicants with disabilities.						

Source of the	Trigger:	Workforce Data (if so identify the table)							
Specific Wor		Workforce Data Table - B9							
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:		Trigger # 2: Individuals with disabilities and targeted disabilities are receiving recognition and awards at rates lower than expected when compared to individuals without disabilities.							
Provide a brief narrative describing the condition at issue.									
How was the condition recognized as a potential barrier?									
STATEMENT OF		Barrier Group							
BARRIER G	ROUPS:	People with 1	Disabilities						
		People with	Targeted Disab	ilities					
Barrier Analysis Process Completed?:		Y	Y						
Barrier(s) Ide	entified?:	Y							
STATEMENT OF IDENTIFIED BARRIER:		Barri	Barrier Name Description of Policy, Procedure, or Practice				ractice		
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.									
	_	T	Objective(s)	and Dates for	EEO Plan				
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed		Objective Description			
09/30/2018	09/30/2020	Yes 09/30/2022 Collaborate with OCHCO to review recognition and awards policy, practices and procedures, and determine next steps.							
			Respo	onsible Officia	l(s)				
	Title	Name				Standards Address The Plan?			
CRCL		Laura Davis				Yes			
OCHCO		Ginny Berry					No		
		Planr	ned Activities T	oward Compl	etion of Obje	ective			
Target Date		Planned Activities			Suffic Staffin Fundi	ıg &	Modified Date	Completion Date	
09/30/2018			) to review reco and procedures,	Ye	S	09/30/2020	09/30/2020		
09/30/2022	1 Expand rev DHS.	riew of recogn	ew of recognition and award practices across			s	09/30/2023	09/30/2023	

	Report of Accomplishments						
Fiscal Year	Accomplishment						
2018	During FY 2018 CRCL identified initial data sources and policies and procedures at the departmental level to begin review. As indicated above, data sources reviewed include workforce data tables, complaint data, Federal Employment Viewpoint Survey responses, and the DHS Exit Interview Survey report.						
	The following DHS Directives and Instructions have been identified for further review in coordination with OCHCO during FY 2019:						
	255-02 Employee Recognition 255-02-001 Instruction guide on Employee Recognition 255-03-001-01 Time-Off Awards						
	255-01 Honorary Awards 255-01-001 Instruction guide on Honorary Awards 255-12 Approval of Monetary Awards over \$6,000						
2021	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 support our efforts, at the end of the third quarter, CRCL developed and issued a Human Resources Policies, Procedures, and Practices Questionnaire through Exec Sec to all DHS Components. The questionnaire was divided into six sections focused on policies, procedures, and practices related to: (I) Recruitment, (II) Hiring, (III) Training and Development Programs, (IV) Promotions, (V) Separations, and (VI) Retention. As part of our next steps, CRCL plans to conduct follow-up discussions with Components and plans to address award policies and practices to gain additional information. CRCL's goal is to complete the analysis by mid-year FY 2022.						
2019	The DHS Directives Instruction Manual describes the processes, procedures and requirements for preparing, reviewing, approving and issuing Directives (policies) and Instructions (procedures). The Manual also provides guidance on other implementing documents, such as manuals, guides, handbooks, reference books, standard operating procedures (SOPs), through the Department of Homeland Security (DHS) Directives System, as defined in DHS Directive 112-01. It also outlines the process by which Directives, Instructions, and/or other Implementing Documents issued under the Directives System are reviewed within two years, to determine if the Directive or Instruction should be (1) Revised; (2) Consolidated; (3) Canceled; or (4) Certified Current (no changes are required and reissued as is with a "current as of" date listed). The Directives Manager is responsible for affirmatively indicating to the DHS Directives Manager what appropriate action is necessary to maintain the Directive or Instruction upon receipt of the notice from the DHS Directives Manager, which is coordinated every two-years.						
	Based on this outlining procedure, all policies and procedures identified are reviewed every two years by the Office of the Chief Human Capital Officer. To date, no potential barriers have been identified.						
	CRCL will continue to coordinate and collaborate with OCHCO on a regular basis to propose recommendations to ensure perceived or actual barriers that may be caused by DHS award policies or associated procedures are addressed.						
2020	Based on a completed review of the department's policies and procedures previously identified and listed below, CRCL did not find any actual or perceived barriers. CRCL will continue to review data and resources both at the Department and Component levels to include "practices" as part of its individual with disabilities barrier analysis to be conducted in FY 2021.  Policies and Procedures Reviewed: 255-02 Employee Recognition 255-02-001 Instruction guide on Employee Recognition 255-03-001-01 Time-Off Awards 255-01 Honorary Awards 255-01 Instruction guide on Honorary Awards 255-12 Approval of Monetary Awards over \$6,000						

	Report of Accomplishments						
Fiscal Year	Accomplishment						
2022	Modified target date for completion.  In FY 2021, CRCL initiated a focused barrier analysis of the DHS disability workforce at all grade levels. The first phase of the analysis included a focus on the FY 2020 workforce and a five-year trend comparison (FY 2015 - FY 2020). The review focused on survey and complaint data, and Department-level and Component-specific policies, procedures, and practices. The analysis concentrated on the identification and eradication of barriers to equal employment opportunity for persons with disabilities, consistent with merit system principles and applicable personnel laws. Data collection included the development and issuance of a Human Resources Policies, Procedures, and Practices Questionnaire through the Executive Secretary to all DHS Components at the end of third quarter in FY 2021. The questionnaire, divided into six sections, focused on policies, procedures, and practices. The areas of exploration included recruitment, hiring, training and development programs, promotions, separations, and retention. During FY 2022, in the second phase of analysis, the CRCL Disability Barrier Analysis Team held two focus groups with representatives from DHS HQ, component huma capital offices, and disability programs. Each focus group session discussed recruitment and hiring; advancement opportunities including training and career development; retention and awards. PWDs and PWTDs receive recognition and awards at rates lower than individuals without disabilities. This is a challenge reported by most Components.						
	Due to staffing changes and resources, CRCL has been delayed in completing its analysis of the data collected. In coordination with components, CRCL intends to complete the third and final phase of the barrier analysis process by mid FY 2023.						
2023	Close out: Policies, procedures, and practices, including those that cover awards, directly impacting employees during the employment lifecycle reside at the Component level within each of the DHS Components. As a result, Components are best equipped to conduct the barrier analysis and develop the corresponding action plans. DHS Department-level staff work to assist the Component and staff in the Component's divisions to identify potential barriers and potential root causes. If a Component identifies a Department-wide policy/procedure as a potential barrier, DHS will conduct the appropriate barrier analysis and submit its own Part J Trigger Plan to address the potential barrier.						
	During FY 2023, DHS experienced and overall reduction in the number of award categories where PWDs and PWTDs were receiving awards at rates lower than expected using the inclusion rate comparator of PWODs. See Section IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities, C. Awards for detailed updates.						

Source of the	Trigger:	Other							
Specific Worl Table:									
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:		Trigger # 3: Lower than expected conversion rates of eligible Schedule A employees into competitive service.							
Provide a brief narrative describing the condition at issue.									
How was the orecognized as barrier?									
STATEMENT OF		Barrier Grou	up.						
BARRIER G	ROUPS:	People with I	Disabilities						
		People with Targeted Disabilities							
Barrier Analysis Process Completed?:		Y							
Barrier(s) Ide	entified?:	Y							
STATEMENT OF IDENTIFIED BARRIER:		Barrier Name Desc			escription of	cription of Policy, Procedure, or Practice			
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.									
			Objective(s) a	and Dates for	EEO Plan				
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed		Objective Description			
09/30/2018	09/30/2021	Yes	09/30/2023		Increase cor employees.	ncrease conversion rates of eligible Schedule A mployees.			
			Respo	nsible Officia	l(s)				
	Title		Name			Standards Address The Plan?			
Departmental Disability Employment Program Manager		loyment	Laura Davis		Yes				
ОСНСО			N/A			No			
		Plann	ed Activities To	oward Compl	etion of Obj	ective			
Target Date F			lanned Activities			Sufficient Modified Staffing & Date Funding?		Completion Date	
		d analyze current policies and procedures for ervice appointments.						09/30/2018	
01/30/2018			onversions on a	quarterly basis	s. Ye	s		12/12/2018	

	Planned Activities Toward Completion of Objective					
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date		
09/30/2018	Coordinate efforts with OCHCO to develop DHS Schedule A guidance.	Yes	06/30/2023	09/30/2023		
	Report of Accomplishm	nents				
Fiscal Year	Accompl	ishment				
2018	During FY 2018, DHS converted a total of 157 Schedule Competitive Service, representing a 55.28 percent conversion-competitively after two years of satisfactory service, two years of service, and four were converted by other many conversions when compared to 101, or 53 percent during Review and analyze current policies and procedures for each CRCL, in coordination with OCHCO/SRDI, began review Department level during FY 2018. As a result, we identite procedures for Schedule A, 5 C.F.R. § 213.3102(u), for high psychiatric disabilities, and intellectual disabilities, are not many many schedule A Conversions on a quarterly basis CRCL has developed a Schedule A reporting and tracking Components. The tracking tool provides a summary review Total Eligible  Total Converted  Conversions to career or career conditional after 24 mo o Conversions to career or career conditional before 24 mo o Conversion Other  Separated before conversion  Total Separations  Eligible not Converted  No Longer Eligible at end of FY 2018 (but was eligible Not Eligible for Conversion  CRCL shares updated summary reports with all Componic Council, which includes Component level Disability Programment Council, which includes Component level Disability Programment Council, which includes Component level Disability Programment Council, CRCL provides detailed reports and total services and total services detailed reports a conversion of the convers	A employees (Perresion rate. Of those 15 converted to careans. Overall DHS FY 2017.  Excepted service applying existing policified several excepted iring people with septimental to the control of the c	converted, 138 were or career conditions and procedures and procedures and service policies evere physical distributions.  HS' Schedule A vemployees by:	ere converted litional before acrease in at the and found that abilities, workforce by		
	level as appropriate.  This activity is complete. CRCL will continue to provide reports and monitor on a quarterly basis as a standard practice.					
	Coordinate efforts with OCHCO to develop DHS Schedule A policy and procedures.					
	CRCL and SRDI began efforts to benchmark other federa SRDI has drafted a proposed standard operating procedure.					

	Report of Accomplishments			
Fiscal Year	Accomplishment			
2019	During FY 2019, DHS converted a total of 159 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 55.28 percent conversion rate. Of those converted, 129 were converted non-competitively after two years of satisfactory service, 27 converted to career or career conditional before two years of service, and three were converted by other means. Overall, DHS experienced an increase in conversions when compared to the 157 during FY 2018. In support of this effort, CRCL continues to monitor Schedule A conversions on a quarterly basis and shares Component-level reports for appropriate action. The reports provide a summary review of Schedule A employees by:			
	<ul> <li>Total Schedule A Workforce</li> <li>Total Eligible</li> <li>Total Converted</li> </ul>			
	o Conversions to career or career conditional after 24 months o Conversions to career or career conditional before 24 months o Conversion Other			
	<ul><li>o Separated before conversion</li><li>Total Separations</li><li>Eligible not Converted</li></ul>			
	<ul> <li>No Longer Eligible at end of FY 2018 (but was eligible at some point in the given year)</li> <li>Not Eligible for Conversion</li> </ul>			
	Coordinate efforts with OCHCO to develop DHS Schedule guidance.  Modified planned activity description to change efforts from developing policy and procedures to developing Schedule A guidance and to update target date for completion until 9/30/2020.  CRCL and OCHCO are continuing these efforts to implement guidance with sound strategies and best practices for utilizing the Schedule A appointment authority for employment, retention, and career development opportunities. DHS plans to socialize and implement the final guidance by 2021.			
	In support of this effort, CRCL developed a DHS Schedule A Factsheet. The factsheet is a high-level overview of the Schedule A Hiring Authority and provides prospective candidates with disabilities with an overview on applying for positions within DHS utilizing Schedule A, as well as a list of DHS Selective Placement Program Coordinators.			
	Additionally, during FY 2019, DHS hosted a webinar on recruiting and hiring individuals with disabilities and targeted disabilities on Tuesday, July 30, 2019. Over 30 supervisors, hiring managers, recruiters, and human resources specialists participated to increase awareness of this topic. A post-webinar survey indicated 81 percent of the participants said they increased knowledge of Schedule A direct hiring authority from (34 percent prior to the webinar) and 58 percent of participants indicated they increased knowledge of the Bender program (17 percent prior to the webinar).			

	Report of Accomplishments			
Fiscal Year	Accomplishment			
2021	During FY 2021, DHS converted a total of 225 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 46.20 percent conversion rate and an increase of 55 conversions compared to FY 2020. Of those converted, 198 were converted non-competitively after two years of satisfactory service, 20 converted to career or career conditional before two years of service, with six 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 five years, from 101 conversions in FY 2017 to 225 conversions in FY 2021.			
	To support increases of Schedule A conversions, CRCL continues to monitor Schedule A conversions on a quarterly basis then share Component-level prepared reports for appropriate action. This report continues to be an effective tool for increasing coordination and tracking of conversions by offering a summary review of Schedule A employee eligibility status.			
	Coordinate efforts with OCHCO to develop DHS Schedule A guidance.  The Department recognizes that while it has an established policy (DHS Directive) on administering the employment of veterans, it does not have a policy covering the Schedule A Appointment Authority for Individuals with Disabilities. During FY 2021, SRDI after consultation with the DHS Disability Employment Program, initiated coordination with the Human Capital Policy and Programs (HCPP), to explore options of implementing departmental guidance. Further coordination efforts will determine whether DHS guidance should be implemented in the form of standard operating procedures (SOPs), a new policy (DHS Directive) for Schedule A, or modifications to the existing Excepted Service Directive. DHS plans to determine a final approach to implement Schedule A guidance by the end of FY 2022.			
2020	During FY 2020, DHS converted a total of 170 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 45.21 percent conversion rate and an increase compared to 11 conversions in FY 2019. Of those converted, 146 were converted non-competitively after two years of satisfactory service; 19 converted to career or career conditional before two years of service, and five were converted by other means. As a result of quarterly tracking and monitoring, DHS Components continued efforts to sustain and experience incremental increases in Schedule A conversions for the last four years.			
	To support increased use of Schedule A conversions, CRCL continues to monitor Schedule A conversions on a quarterly basis then share Component-level prepared reports for appropriate action. This report continues to be an effective tool for increasing coordination and tracking of conversions by offering a summary review of Schedule A employee eligibility status.			
	Coordinate efforts with OCHCO to develop DHS Schedule A guidance.  Due to unforeseen delays, efforts to develop and deploy DHS Schedule A Guidance were slightly delayed.  OCHCO SRDI drafted a DHS Schedule A standard operating procedures document. The draft was forwarded to CRCL for review in November 2020. The target date for this activity has been modified to 06/30/2021 to provide additional time for review and coordination.			
	Additionally, all DHS hiring officials (managers/supervisors) and human capital professionals are required to complete the People with Disabilities: A Roadmap to Success course within 60 days of appointment and then every two years thereafter. The Roadmap training is a comprehensive course on disability employment including the use of special hiring non-competitive authorities such as Schedule A and 30% or More Disabled Veteran appointments. As previously mentioned, because this training is a vital to support DHS' affirmative action program for individuals with disabilities and targeted disabilities, CRCL is currently in the process of developing a new training module with updated content consistent with current laws, regulations, initiatives and Executive Orders.			

	Report of Accomplishments				
Fiscal Year	Accomplishment				
2022	During FY 2022, DHS converted a total of 313 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 55.89 percent conversion rate and an increase of 88 conversions compared to FY 2021. Of those converted, 283 were converted non-competitively after two years of satisfactory service, 19 converted to career or career conditional before two years of service, with 11 converted by other means. As a result of quarterly tracking and monitoring, DHS Components continued efforts resulted in incremental increases in conversions for the last six years, from 101 conversions in FY 2017 to 313 conversions in FY 2022.  To support increases of Schedule A conversions, CRCL continues to monitor Schedule A conversions on a quarterly basis and distributes Component-level reports for appropriate action. This report continues to be an effective tool for increasing coordination and tracking of conversions by offering a summary review of				
	Schedule A employee eligibility status.  Coordinate efforts with OCHCO to develop DHS Schedule A guidance.  Modified target date for completion to 2023 due to staffing changes and resources.  The Department recognizes that while it has an established policy (DHS Directive) on administering the employment of veterans, it does not have a policy covering the Schedule A Appointment Authority for Individuals with Disabilities. During FY 2021, SRDI, after consultation with the DHS Disability Employment Program, initiated coordination with the Human Capital Policy and Programs (HCPP), to explore options of implementing departmental guidance. Further coordination efforts will determine whether DHS guidance should be implemented in the form of standard operating procedures (SOPs), a new policy (DHS Directive) for Schedule A, or modifications to the existing Excepted Service Directive. DHS plans to determine a final approach to implement Schedule A guidance by the end of FY 2023.				
2023	Closed/Complete During FY 2023, DHS converted a total of 217 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 45.49 percent conversion rate, representing an overall decrease of nearly ten percent from FY 2022. There are various reasons for not converting all eligible Schedule A employees, including lack of automated reporting, tracking, and monitoring capabilities, including notification systems at the Component level, as well as individual management discretion based on employee performance. Of those converted, 176 were converted non-competitively after two years of satisfactory service, 29 converted to career or career conditional before two years of service, with 12 converted by other means. As a result of accurate quarterly tracking and monitoring, DHS Components continued efforts have resulted in incremental progress with Schedule A conversions over the last six years.				
	Coordinate efforts with OCHCO to develop DHS Schedule A guidance. During FY 2023, CRCL continued efforts to finalized proposed Schedule A Staffing Guidance, and submitted the final recommendation, covering comments that were adjudicated to DHS OCHCO, Human Capital Policy, and Programs, through OCHCO STRIDE for implementation. STRIDE has informed CRCL, that the staffing guidance should be fully implemented by the end of second quarter FY 2024. CRCL also recommended that the newly established guidance be posted to the DHS OCHCO, HCPP Staffing Guidance intranet page, and widely communicated and distributed with Human Capital professionals.				

Source of the T	rigger:	Workforce Data (if so identify the table)						
Specific Workfo Table:	orce Data	Workforce Data Table - B1						
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:		Trigger # 4: I	Higher than exp	ected separation	n rates for inc	lividuals	s with disabilities.	
Provide a brief n describing the coissue.								
How was the correcognized as a parrier?								
STATEMENT (		Barrier Grou	ıp					
BARRIER GRO	DUPS:	People with I	Disabilities					
		People with	Targeted Disab	ilities				
Barrier Analysi Completed?:	s Process	Y						
Barrier(s) Ident	tified?:	Y						
STATEMENT (IDENTIFIED B	_	Barri	er Name	D	escription of	Policy,	Procedure, or P	ractice
of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.			Objective(s)	and Dates for	EEO Plan			
Date	Target Date	Sufficient	Date	Date Date		Ohi	jective Description	n .
Initiated	Target Date	Funding / Staffing?	Modified	Completed		Obj	cetive Description	<b>711</b>
09/30/2017 0	9/14/2018	Yes	09/30/2023			ncrease retention rates of individuals with disabilities and targeted disabilities.		
			Respo	onsible Officia	l(s)			
	Title	Name			Standards Address The Plan?		s The Plan?	
Departmental Depar		loyment	Laura Davis				Yes	
OCHCO			N/A				No	
		Plann	ed Activities T	oward Compl	etion of Obi	ective		
			ned Activities		Suffic Staffir Fundi	ient ng &	Modified Date	Completion Date
01/30/2018 Review and retention.		l analyze exit	analyze exit surveys to identify barriers to Yes 01/30/2021 12			12/15/2021		
			quarterly basis	by disability	Ye	s		10/16/2018

	Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date	
06/30/2018	Collaborate with OCHCO to explore the feasibility of implementing new retention programs specifically for PWDs and PWTDs.	Yes	09/30/2022	09/30/2022	
09/30/2021	Conduct study on reasonable accommodation requests and procedures for delayed and denied accommodations to identify potential correlations to high separations.	Yes	06/30/2023	09/30/2023	

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

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

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

	Report of Accomplishments				
Fiscal Year	Accomplishment				
2022	FY 2022 Update – The DHS 2022 Exit Survey results exclude TSA, USSS, CBP, CISA, and ICE. Component-specific data can be gleaned from Component reports. Excluding two categories "Other and Retirement", the top three categories cited by separating PWDs as primary reasons for leaving include: (1) Supervisor/ Management (11 percent); (2) Work Environment & Personal/Family Related (8.8 percent); and (3) Health Reasons (7.9 percent). The top three categories cited by separating PWTD included: (1) Supervisor/ Management (23 percent); (2) Salary/Pay, Work Environment, Geographic Location and Health Related (7 percent); and (3) Personal/ Family Related, Advancement Opportunities, and Diversity/Inclusion (5.3 percent). The Department surmises a direct correlation between "separation for health reasons" and "the high percentage of positions with medical and physical requirements." FY 2022 exit survey results now include specific data on the newly established disability program questions. Starting with the FY 2020 responses as a baseline, DHS now has a three-year trend to continue effort in monitoring responses to inform potential challenge areas. Based on the FY 2022 summary analysis, the following data summarizes the response rates and compares the total percent of favorable responses (Strongly Agree; Agree; and Neither Agree nor Disagree) to each of the six questions by PWOD respondents compared to PWD and PWTD:  1. DHS took appropriate steps to ensure accessibility (technology and facility) requirements were met for qualified individuals of disabilities.  FY 20 FY 21 FY22  PWOD 43.84% 34.04% 49.44%  PWD 65.71% 54.93% 64.91%  PWTD 43.75% 35.29% 63.16%  Favorable response rates increased from FY 2021 to FY 2022 for all groups.  PWD had the highest favorable response rate, with similar rates from both PWTD and PWOD. See FY 22 MD-715 Report for complete analysis.  Modified Planned Activity: Collaborate with OCHCO to explore the feasibility of implementing new retention programs specifically for PWDs and PWTDs.				
	During FY 2022, CRCL planned to launch the third cohort of the DHS Disability Mentoring Program during the month of October in observance of National Disability Employment Awareness Month.				
	After further review of the planned activity, CRCL will continue to support the DHS Disability Mentoring Program as a successful retention program. However, CRCL has re-evaluated and determined that further development and consideration of new retention programs need to be implemented at the Component level. Accordingly, his planned activity at the Department level will be closed out.				

	Report of Accomplishments				
Fiscal Year	Accomplishment				
2021	FY 2021 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. Component specific data can be gleaned from Component level reports. Aside from retirement, based on data available for FY 2021, the top three primary reasons for PWDs separating from DHS include: 1) Supervisor/Management; 2) Personal or Family Related; and 3) Advancement Opportunities.				
	FY 2021 exit survey results now include specific data on the newly established disability program questions. DHS use the FY 2020 responses to these questions as a baseline comparison in the FY 2021 summary analysis. The following data summarizes the top three response rates and compares the total percent of favorable responses (Strongly Agree; Agree; and Neither Agree nor Disagree) for each of the six questions by respondents without a disability (PWOD) compared to PWD and PWTD:				
	DHS took appropriate steps to ensure accessibility (technology and facility) requirements were met for qualified individuals of disabilities.     FY 20 FY 21				
	PWOD 43.84 % 34.04% PWD 65.71% 54.93% PWTD 43.75% 35.29%				
	See FY 21 MD 715 Report for full analysis.				

	Report of Accomplishments				
Fiscal Year	Accomplishment				
2012	Closed/Complete				
	During FY 2023, the DHS Exit Survey results were based on exiting employees from CBP, CISA, HQ, FEMA, FLETC, TSA, and USCG. Component-specific data can be gleaned from Component reports. Excluding three categories (Other, Retirement, and Temporary), the top three categories cited by separating PWDs as the reason for leaving were:				
	1st Top Reason: Supervisor/Management (22.6 percent) 2nd Top Reason: Advancement Opportunities (16.1 percent) 3rd Top Reason: Personal/Family Related (11.3 percent)				
	he top three categories cited by separating PWTD included:				
	1st Top Reason: Advancement Opportunities (20 percent) 2nd Top Reason: Personal/ Family Related (16 percent) 3rd Top Reason: Supervisor/Management (12 percent)				
	The Department surmises a direct correlation between "Personal/Family Related" and coupled with "Separation for Health Reasons" and "the high percentage of positions with medical and physical requirements." Health-related reasons was cited as the primary reason for separating by 6.45% (4/62) of separating PWDs.				
	FY 2023 exit survey results continued to include the disability program questions first introduced in FY 2020. Based on the FY 2023 summary analysis, the following data compares the total percent of favorable responses (Strongly Agree and Agree) to each of the six questions by PWOD respondents compared to PWD and PWTD. Respondents answering "No basis to judge" or who left the questions blank were removed from the analysis. Note that in prior reports, respondents answering "No basis to judge" or who left the questions blank were not removed from the analysis. In the tables below, the percentages have been recalculated to remove respondents answering "No basis to judge" or who left the questions blank for all years. (see attached MD-715 Report for detailed analysis)  During FY 2023, DHS experienced an increase in favorable responses from PWD and PWTD groups.				
	However, questions covering recruitment, hiring, advancement and retention continued to have favorable response rates at or below 50 percent. DHS will continue to monitor.				
	Conduct study on reasonable accommodation requests and procedures for delayed and denied accommodations to identify potential correlations to high separations.				
	In FY 2023, CRCL implemented a new quarterly reporting requirement to monitor and track progress and compliance of Component Reasonable Accommodation Programs. This new requirement provides CRCL with quarterly updates to assist with monitoring and evaluating the effectiveness of reasonable accommodation programs across the Department consistent with our oversight responsibilities. In furtherance of the Department's efforts to re-establish a department-wide tracking system to monitor reasonable accommodation programs across the Department, CRCL requests each Component to submit a quarterly program update with the following information:				
	<ul> <li>Total Number of RA, PAS, and PWFA Requests (as of the end of each quarter)</li> <li>Reasonable Accommodation Processing Timeframes</li> <li>Staffing and Resources to Support the Reasonable Accommodation Program</li> <li>Status of Compliant Reasonable Accommodation Procedures</li> <li>Procedures Posted to Internal and External Website</li> </ul>				
	• Additional information (Provide relevant updates on activities taken during the quarter to support the effectiveness of the policies, procedures, or practices implementing the Component'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.)				

Source of the	Trigger:	Workforce D	ata (if so identify	the table)						
Specific Workforce Data Table:		Workforce Data Table - B1								
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:  Provide a brief narrative describing the condition at issue.		Triggers for PWD and PWTD vary across the DHS Components, including but not limited to workforce participation by grade cluster (GS 1-10 and GS 11 – SES); new hires and internal promotions by MOC, Senior Grades (GS 13 -15), and Supervisory Positions; Career Development; Awards; and Separations. Each Component identifies specific triggers through analysis of their respective workforce data. The Components focus on the most critical workforce triggers, conduct barrier analyses, and develop action plans in Part J of their respective MD-715 reports. The Department works with the Components on providing data to identify workforce triggers and tools to conduct robust barrier analyses.								
How was the condition recognized as a potential barrier?										
STATEMENT OF BARRIER GROUPS:		Barrier Group								
		People with Disabilities								
		People with Targeted Disabilities								
Barrier Analysis Process Completed?:		Y								
Barrier(s) Ide	entified?:	Y								
STATEMENT OF IDENTIFIED BARRIER:		Barrier Name			Description of Policy, Procedure, or Practice					
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.										
	1	T	Objective(s) a	nd Dates for	EEO Plan					
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed		Objective Description				
09/30/2023	09/30/2024	Yes			Provide technical guidance and assistance through quarterly Disability Employment Advisory Council and related committee meetings, training, analytics, tools (such as questionnaires, facilitation protocols, templates) and staff resources (for example, participate on Component Barrier Analysis Teams and contractor selection panels) and general oversight and monitoring of Component barrier identification and action plan efforts.					
			Respor	nsible Officia	l(s)					
Title			Name			Standards Address The Plan?				
Deputy CRCL Officer & Director of Equal Employment Opportunity, and Diversity, CRCL			Veronica Ventur	re		Yes				
Director, Diversity Management Section (DMS), CRCL			Ambuja Bale			Yes				

Fiscal Year

		Responsible Official(s)				
	Title	Name	S	Yes Yes Yes		
	ability Employment , (EEOD/DMS), CRCL	Laura Davis				
Chief Human Cap	oital Officer, OCHCO	Roland Edwards				
Component EEO l	Directors	Various				
	Planr	ned Activities Toward Completio	n of Objective			
Target Date	Planr	ned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date	
	DHS Components on data barrier analysis, and prov serve on Component EEC	(CRCL, DMS) will consult with a analysis/trigger identification, ide Department-level staff to D staff hiring panels, selection s contractors, and Component	Yes			
	each DHS Component's properties with each Component Department staff review a	its. CRCL/DMS will review prior year MD-715 report then ent. In the meetings, DHS and identify opportunities and to further barrier analysis	Yes			
	Components. CRCL/DM tools consistent with EEC Components with their babe provided initially to 1-effectiveness. The tools the DHS Components will questionnaires, focus grou (including root cause analysis).	lysis), sample questions, and reports. Tools may be refined	Yes			
09/30/2024	Conduct MD-715/barrier will develop and deliver l covering topics such as M developing a barrier analy supplemental/qualitative	analysis training. CRCL/DMS MD-715/barrier analysis training MD-715 reporting requirements,	Yes			
	Lead Quarterly Disability Meetings - annually	Employment Advisory Council	Yes			
	support and partner with a employee associations; do	nonth observance program;	Yes			

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

Accomplishment

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

DHS is continuing to see improvements in most of all aspects of employment for individuals with disabilities and targeted disabilities. Departmental efforts will now be shifted to support Component level barrier analysis.

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

DHS will continue to examine and conduct barrier analysis in collaboration with OCHCO and Components. Until barrier(s) are identified at the Component level, DHS will continue to provide technical support and guidance.