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

Homeland
Security

Table of Contents

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

MD-715
Parts A Through D: Agency Identifying Information

Part A - Department or Agency Identifying Information

Agency	Second Level Component	Address	City	State	Zip Code (xxxxx)	Agency Code (xxxx)	FIPS Code (xxxx)
Department of Homeland Security (DHS)		2707 Martin Luther King Jr Ave, SE	Washington	DC	20528	HS00	7000

Part B - Total Employment

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	200,456	22,142	222,598

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

Agency Leadership	Name	Title
Head of Agency	Alejandro N. Mayorkas	Secretary of Homeland Security
Head of Agency Designee	Shoba Sivaprasad Wadhia	Officer for Civil Rights and Civil Liberties

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

EEO Program Staff	Name	Title	Occupational Series (xxxx)	Pay Plan and Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
Principal EEO Director/Official	Veronica Venture	Deputy Officer, Office for Civil Rights and Civil Liberties (CRCL), and Director of Equal Employment Opportunity and Diversity	0260	ES-00	202-357-1270	veronica.venture@hq.dhs.gov

EEO Program Staff	Name	Title	Occupational Series (xxxx)	Pay Plan and Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
Title VII Affirmative EEO Program Official	Ambuja Bale	Director, Diversity Management Section (DMS), CRCL	0260	GS-15	202-695-1171	ambuja.bale@hq.dhs.gov
Section 501 Affirmative Action Program Official	Laura Davis	Equal Employment Manager, DMS, CRCL	0260	GS-15	202-357-1264	laura.davis@hq.dhs.gov
Complaint Processing Program Manager	Amelia Demopulos	Director, Complaints Management and Adjudication Section (CMAS), CRCL	0260	GS-15	202-357-1273	amelia.demopulos@hq.dhs.gov
EEO Staff Statistician	Greg Beatty	EEO Staff Statistician, DMS, CRCL	1530	GS-15	202-897-6984	greg.beatty@hq.dhs.gov
Special Emphasis Program Manager (SEPM)	Michelle McGriff	Equal Employment Manager, DMS, CRCL	0260	GS-15	202-357-1261	michelle.mcgriff@hq.dhs.gov
Special Emphasis Program Manager (SEPM)	Conchetta Belgrave	Equal Employment Opportunity Manager, DMS, CRCL	0260	GS-14	202-357-1249	conchetta.belgrave@hq.dhs.gov
Equal Opportunity Employment Specialist	Sara Fernandez	Equal Employment Opportunity Specialist, DMS, CRCL	0260	GS-14	202-357-1268	sara.fernandez@hq.dhs.gov

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

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

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

Subordinate Component	City	State	Country (Optional)	Agency Code (xxxx)	FIPS Codes (xxxxx)
U.S. Customs and Border Protection	Washington	DC		HSBD	7014
U.S. Citizenship and Immigration Services	Camp Springs	MD		HSAB	7003
U.S. Coast Guard	Washington	DC		HSAC	7008
Federal Emergency Management Agency	Washington	DC		HSCB	7022
Federal Law Enforcement Training Centers	Glynco	GA		HSBE	7015
U.S. Immigration and Customs Enforcement	Washington	DC		HSBB	7012
U.S. Secret Service	Washington	DC		HSAD	7009
Transportation Security Administration	Springfield	VA		HSBC	7013
Cybersecurity and Infrastructure Security Agency	Washington	DC		HSCA	7000
Headquarters - Office of the Secretary	Washington	DC		HSAA	7002
Headquarters - Office of the Inspector General	Washington	DC		HSAA	7004
Headquarters - Management Directorate	Washington	DC		HSAA	7050 & 7051
Headquarters - Science & Technology Directorate	Washington	DC		HSFA	7040 & 7041

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

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

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

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

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

Part E: Executive Summary

Part E.1 - Executive Summary: Mission

Introduction

This Equal Employment Opportunity Program Status Report for Fiscal Year 2023 (FY 2023) outlines the status of U.S. Department of Homeland Security (DHS or Department) Equal Employment Opportunity (EEO) Program activities undertaken pursuant to its EEO program responsibilities under Title VII of the Civil Rights Act of 1964, as amended (Title VII). This report also describes DHS activities undertaken pursuant to its affirmative action obligations under the Rehabilitation Act of 1973, as amended, and as required by U.S. Equal Employment Opportunity Commission (EEOC) Management Directive (MD) 715.

This report highlights DHS's accomplishments in establishing and maintaining a model program by promoting equal employment opportunity for all employees and applicants for employment. The report also provides the FY 2024 plan to address any programmatic deficiencies that were identified during the year. In addition to this DHS Management Directive 715 report, each DHS Component prepares and submits its own report to the EEOC.

The U.S. Department of Homeland Security

The mission of DHS is: *With honor and integrity, we will safeguard the American people, our homeland, and our values.* There are six related homeland security missions: 1) Counter Terrorism and Homeland Security Threats; 2) Secure U.S. Borders and Approaches; 3) Secure Cyberspace and Critical Infrastructure; 4) Preserve and Uphold the Nation's Prosperity and Economic Security; 5) Strengthen Preparedness and Resilience; and 6) Champion the DHS Workforce and Strengthen the Department.

The Office for Civil Rights and Civil Liberties

The Office for Civil Rights and Civil Liberties (CRCL) supports the DHS mission to secure the Nation while preserving individual liberty, fairness, and equality under the law. CRCL is responsible for overseeing the integration of civil rights and civil liberties into all DHS activities. Among its many responsibilities, CRCL leads DHS's EEO programs and promotes workforce diversity and merit system principles. CRCL's EEO and Diversity (EEOD) Division includes the following organizational units: Diversity Management Section (DMS); Complaints Management and Adjudication Section (CMAS); Alternative Dispute Resolution (ADR) Section; DHS Headquarters EEO Office (HQ EEO); and HQ Anti-Harassment Unit (AHU).

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

Program Elements

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

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

The EEOC has established 156 specific measures that cover the essential elements. Each DHS Component reports to the EEOC on whether each measure is *met*, *unmet,* or *not applicable*. For this report, the Department issued a data call to all DHS Components to provide a draft list of measures indicating met, unmet, or not applicable status. The overall compliance rate with the six essential elements for DHS increased from 93.9 percent in FY 2022 to 96.1 percent in FY 2023.

The scorecard below shows the percentage of measures met by DHS Components for each of the essential elements during FY 2022 and FY 2023. The percentages also include those measures reported at the Department level.

Model EEO Program Scorecard		
	FY 2022 % Met	FY 2023 % Met
Essential Element A: Demonstrated Commitment from Agency Leadership	95.1%	100.0%
Essential Element B: Integration of EEO into the Agency's Strategic Mission	89.4%	93.54%
Essential Element C: Management and Program Accountability	93.0%	94.13%
Essential Element D: Proactive Prevention of Unlawful Discrimination	92.9%	94.3%
Essential Element E: Efficiency	94.9%	94.6%
Essential Element F: Responsiveness and Legal Compliance	98.3%	100.0%
Overall Compliance Rate	**93.9%**	**96.1%**

A summary of highlights and FY 2023 accomplishments that correspond to each essential element is included below.

Essential Element A – Demonstrated Commitment from Agency Leadership

DHS leadership is committed to ensuring that the Department fully integrates the principles of EEO in every action, program, and policy. The annual EEO and anti-discrimination statement was issued by the Secretary in October 2022. In addition, the Secretary provided keynote remarks at the FY 2023 EEO and Diversity Conference. During his remarks, he reaffirmed his commitment to EEO and diversity as well as thanked the EEO and diversity professionals across the department for promoting EEO and advancing diversity, equity, inclusion, and accessibility. During the FY 2023 EEOD Conference, agency leaders from across the DHS Components were active participants in panel sessions and plenary talks to demonstrate their commitment to EEO. DHS leadership has also actively participated in all Departmental Special Emphasis Observances.

DHS leadership is also committed to supporting career advancement and serve as mentors and keynote speakers for the DHS Women in Law Enforcement (WLE) Mentoring Program and the DHS Disability Mentoring Program (DDMP). In January 2023, CRCL deployed the fifth cohort of the DHS WLE Mentoring Program with 41 mentee and mentor pairings from across DHS Components. In October 2022, to coincide with National Disability Employment Awareness Month, CRCL deployed the third DDMP cohort with 26 mentor and mentee pairings representing nine out of ten DHS Components.

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

DHS has integrated EEO into the Agency's Strategic Mission, values, and priorities. The DHS Strategic Plan for FY 2020-2024 includes six strategic goals, one of which is to *Champion the DHS Workforce and Strengthen the Department*.

The Department's workforce strategy and priorities integrate diversity and equal employment opportunity by:

> Maintaining a highly skilled, diverse, and engaged workforce to accomplish the homeland security mission, which relies on dedicated personnel who go above and beyond to keep Americans safe from harm.
>
> Promoting a culture of transparency, fairness, and equal employment opportunity throughout the DHS workforce, and providing avenues of redress and leadership support in addressing and resolving workplace conflict via integrated conflict management and Alternative Dispute Resolution systems.
> Supporting and championing our workforce and advancing a culture of excellence; and recruit, hiring, and retaining a world-class, diverse workforce to create an inclusive, representative, and trusted department.

The Department also actively involves the EEO Office (i.e., CRCL) in critical and impactful decisions. During FY 2023, CRCL continued its participation in recurring high-level strategic

activities, including the Secretary's Monthly Leadership meetings and Senior Leadership Forums; the Deputy's Management Action Group meetings; DHS Chiefs of Staff meetings (composed of all DHS Component Chiefs of Staff, or the equivalent); Human Capital Leadership Council (HCLC) meetings (chaired by the Chief Human Capital Officer and composed of all DHS Component Chief Human Capital Officers); the Human Resources Policy Council; the Workforce Planning Council, which shapes the workforce planning and workforce measurement programs for DHS; and the Reconstitution/Return-to-Workplace Working Group meeting. Participation in these meetings ensures inclusion of the EEO perspective and integration into the Department's strategic priorities.

In addition, CRCL coordinated training for managers and supervisors on EEO responsibilities to ensure that EEO is fully integrated across the Department and that consistent information is shared across Components. CRCL works to ensure that all managers and supervisors have increased awareness of their responsibilities to incorporate EEO into their office practices and work units.

Examples of these trainings include:

- Quarterly EEO and reasonable accommodation training for all supervisors participating in Office of the Chief Human Capital Officer (OCHCO) HR Essentials Training programs.

- Reassignment as a Reasonable Accommodation of Last Resort training for Human Resource Management Services employees.

- Unconscious Bias Training for DHS EEO professionals and Component staff at the 2023 DHS EEO and Diversity Training Conference.

Essential Element C – Management and Program Accountability

DHS ensures management and program accountability by 1) conducting technical assistance sessions (e.g. internal audits), 2) having established procedures to address and prevent all forms of discrimination (e.g. effective anti-harassment program), 3) reviewing reasonable accommodation procedures to ensure compliance with EEOC enforcement guidance, 4) ensuring managers and supervisors are evaluated on their efforts to ensure equal employment opportunity, and 5) ensuring appropriate coordination between CRCL and the Office of the Chief Human Capital Officer (OCHCO). These efforts and accomplishments are described below.

Internal Audits – Technical Assistance Sessions

DMS conducted technical assistance sessions and training for all DHS Components. Topics included an EEO Reports Update on MD-715 and a review of Affirmative Action Plans for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities. This technical assistance ensures that EEO services are being provided in accordance with federal regulations as enforced by the EEOC.

CRCL also coordinated regular meetings with DHS Components to advise them on the MD-715, Special Emphasis Programs, the EEO complaints process, and Anti-Harassment Programs. As part of these regular meetings, CRCL provided a briefing on the FY 2023 Mid-Year Review Report based on DHS-wide data provided to DHS Component special emphasis program managers (SEPMs) and MD-715 preparers. This DHS-wide report contained a review of Component self-assessments, program deficiencies, disability employment progress, and actions taken toward creating a model workplace. The mid-year report content was also made available to Components for their use when preparing their respective annual MD-715 reports.

The EEOD Director ensured that the Affirmative Action Plan for the Recruitment, Hiring, and Advancement of Individuals with Disabilities continued as a major initiative in every DHS Component in FY 2023. To support these efforts, CRCL provided guidance, technical assistance, and feedback to all DHS components to ensure their progress in complying with personal assistance services (PAS) obligations outlined in 29 C.F.R. § 1614.203(d)(5). CRCL used a tracking mechanism to coordinate activities across the Department, managing and monitoring progress to ensure DHS's compliance with regulatory requirements.

EEO Anti-Discrimination and Anti-Harassment Programs

DHS's EEO Program effectively and efficiently processes EEO complaints and notes an increased efficiency and compliance with providing Final Agency Decisions (FADs) over the past several fiscal years. These efforts are described further within Essential Element E – Efficiency of this section. DHS also maintains a firewall between the EEO programs and its anti-harassment program.

DHS implements the Department's Anti-Harassment Directive by promptly and effectively addressing allegations of workplace harassment. Training conducted across the Department covers preventing and addressing harassment in the workplace, the DHS Anti-Harassment policy and reporting requirements, the Anti-Harassment Unit's process when conducting inquiries into reports of harassment, and the role Employee Relations performs when addressing reports of harassment. The Department continues to require *Preventing Workplace Harassment* training for all DHS employees.

Reasonable Accommodation Program

CRCL continues to support a robust Reasonable Accommodation Program throughout the Department. During FY 2023, DHS received 4,942 requests for reasonable accommodations due to a disability, eight 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. This was an eight-day increase from the processing time reported in FY 2022. These metrics do not include the average processing time for reasonable accommodation requests at USCIS, which were unavailable at the time of reporting. DHS timely processed approximately 70 percent of all requests using the time frames described in the Components' reasonable accommodation procedures. DHS continued its partnership with the Department of Defense's (DoD)

Computer/Electronic Accommodation Program (CAP). CAP conducts needs assessments for DHS employees with disabilities who have requested an accommodation.

CRCL and Component-level subject matter experts continue to collaborate with the Office of Accessibility and Usability (A&U) on enhancing the Accessibility Compliance Management System (ACMS). ACMS is the Department's reasonable accommodation tracking and management portal. Two major modifications were made for FY 2023. In June 2023, ACMS was modified giving DHS the capability to accept and process reasonable accommodation requests covered by the Pregnant Workers Fairness Act (PWFA). In September 2023, ACMS was used to notify 17,000 employees that their requests for medical/religious exemption to the vaccine mandate would be administratively closed pursuant to Executive Order 14099 which rescinded the vaccine mandate. Using an ACMS auto-generated letter, approximately 95 percent of reasonable accommodation requests for an exemption to the vaccine mandate were closed.

In the second quarter of FY 2023, CRCL implemented a new reasonable accommodation quarterly reporting requirement to monitor and evaluate the effectiveness of reasonable accommodation programs across the Department. This quarterly reporting requirement is supported under the Rehabilitation Act of 1973, as amended, its implementing regulations, and the DHS Directive 259-01, *Providing Reasonable Accommodations for Employees and Applicants with Disabilities*, and its associated Instructions (259-01-001 and 259-01-002). Each DHS Component must now submit a quarterly program update with the total number of reasonable accommodation requests, personal assistance services requests, and PWFA requests made by its employees. The quarterly report also details the reasonable accommodation processing timeframes; staffing and resources to support the reasonable accommodation program; status of compliant reasonable accommodation procedures; and links to procedures posted on internal and external websites.

Evaluation of Managers and Supervisors to Ensure Equal Employment Opportunity

Across DHS, managers and supervisors have an EEO performance element and are trained in EEO laws, regulations, procedures, and best practices specific to recruitment, hiring, and managing personnel within their work unit. High level managers and supervisors are involved in the workforce barrier analysis process supporting the action plans developed to address and eliminate identified barriers. One noted success is the increased representation of individuals with disabilities in GS-12 and higher positions. Since FY 2022, this has not been considered a workforce trigger (area where workforce representation is a cause for concern) because leaders across the Department worked to increase awareness of recruitment and hiring flexibilities. They also approved and provided reasonable accommodations to individuals with disabilities enabling them to perform essential job functions. Senior leaders also served as mentors to individuals with disabilities through CRCL's Disability Mentoring Program.

Supervisors and managers are also participating in Special Emphasis observances to increase awareness of underrepresented groups in the workforce, as well as to expand outreach opportunities. Many of these accomplishments are discussed further in Essential Element D – Proactive Prevention.

Collaboration with MGMT OCHCO (Human Resources)

CRCL regularly collaborates with MGMT OCHCO on initiatives and programs, including the strategic goals identified in the annual DHS Human Capital Operational Plan for FY 2022-2026, and the DHS Inclusive Diversity Strategic Plan for FY 2021-2024.

The DHS Corporate Recruitment Council (CRC) brings together key recruiting personnel across DHS and develops an annual list of recruiting and outreach events that target diverse populations. In FY 2023, CRC members participated in fourteen Department-wide recruiting and outreach events which focused on targeted skillsets including but not limited to, Women in Law Enforcement, Cybersecurity, Human Resources, and Science, Technology, Engineering and Mathematics (STEM). Of particular focus during FY 2023 was attracting and retaining females to the Department's cyber and law enforcement positions. Continued efforts to further the Women in Law Enforcement initiative saw the Department end the fiscal year with 35% of new hires in the law enforcement and law enforcement-related positions being women, and 13.52% among sworn LEOs.

DHS launched the inaugural Intelligence and Cybersecurity Diversity Fellowship (ICDF) cohort in May 2023. Five components participated in this inaugural cohort: CISA, USCIS, USCG, USSS, and Intelligence and Analysis (I&A). The inaugural cohort was composed of 16 fellows, of whom 3 percent identified as racially or ethnically diverse and 56 percent identified as women. During the 12-week paid fellowship, the participants met with Congressman Bennie Thompson, had a tour of the U.S. Capitol, met with Secretary Mayorkas, and participated in weekly panels and engagement opportunities with industry leaders and government subject matter experts. Seven DHS agencies and offices (CISA, ICE, USCG, USCIS, USSS, MGMT-OCHCO, and I&A) committed 26 positions to ICDF for the summer 2024 cohort with recruitment beginning in August 2023. DHS amplified its outreach efforts to focus on Historically Black Colleges and Universities and Minority Serving Institutions to bolster efforts to ensure the ICDF program is broadly advertised. The FY24 fellows are expected to onboard mid-May 2024 for a 12-week full-time internship.

The FY 2023 Secretary's Honors Program (SHP) launched with 53 participants in the Cybersecurity cohort and 10 participants in the Climate Change Professionals cohort. Within the FY 2023 SHP cohort, 32 percent identified as racially or ethnically diverse and 38 percent identified as women. Eight component site tours were provided for the FY 2023 cohort along with the opportunity for participants to attend the BlackHat Conference. Components initiated the hiring process for the FY 2024 Human Resources cohort with an anticipated 41 participants.

DHS also focused on outreach events targeting underrepresented demographics including, but not limited to, the Congressional Black Caucus, Careers & the DisABLED Fair, League of United Latin American Citizens, the White House Initiative on Advancing Educational Equity, Excellence, and Economic Opportunity through Historically Black Colleges and Universities (WHI HBCU) 2023 Recruitment and Career Fair, and AnitaB.org Grace Hopper Celebration.

The Office of Academic Engagement (OAE), within DHS's Office of Partnership and Engagement (OPE), has 22 established MOUs with colleges, universities, and associations that

address underserved communities, including ten HBCUs, three Hispanic Serving Institutions, two women's colleges, and one Predominantly Black Institution.

DHS continues to recruit talent through 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, 48 percent self-identified as minorities while 44 percent self-identified as women.

Essential Element D – Proactive Prevention of Unlawful Discrimination

DHS's Special Emphasis Programs (SEPs) are a collective set of activities which ensure that specific demographic groups in the DHS labor force are represented and offered the same rights, benefits, and privileges of employment as the rest of the workforce on a nondiscriminatory basis. These activities typically include, but are not limited to, recruitment, hiring, workforce training, education, development, and programmatic and administrative efforts that seek to proactively prevent systemic discrimination.

SEPs are integral to the success of the Department's affirmative employment efforts. SEPs address the unique concerns of particular demographic groups in the labor force that have been identified by law (e.g., individuals with disabilities, women, and Hispanics), regulation, or executive order as having experienced historical rates of participation in the Federal government workforce below comparable availability levels. Proactive prevention of discrimination is integral to the Department's efforts to ensure diversity, inclusion, and equal opportunity in the workforce. SEPs focus on workforce analysis to identify, address, and eliminate barriers. SEPs also provide and support career development programs, support the conduct of outreach to minority serving institutions and underrepresented communities, and educate the workforce through special emphasis observances. DMS staff distributes a DHS-wide listing of Special Emphasis observances for each commemorative month. Throughout FY 2023, DMS staff promoted three significant SEP areas of focus: workforce barrier analyses, special emphasis observances, and career development and outreach.

Workforce Barrier Analyses

On at least an annual basis, DHS conducts a self-assessment on its obligation to prevent discrimination on the bases of race, color, national origin, religion, sex (including gender identity and sexual orientation), age, reprisal, genetic information, and disability. As part of this self-assessment, workforce triggers are identified, and barrier analyses are conducted to identify where barriers may exist to potentially exclude certain groups. DHS develops action plans to eliminate the identified barriers based on race, sex, national origin, and disability. The workforce analysis later in this report (Part E) describes the identified triggers in the workforce and how they were ascertained. Parts I and J identify the major triggers, barriers, and sources of information used to identify the barriers and monitor the progress in eliminating the barriers, and the actions plans developed to eliminate the barriers.

In FY 2023, consistent with EEOC benchmarks, DHS established Department-wide and Component-specific hiring goals of 12 percent for individuals with disabilities (IWDs) and 2 percent for individuals with targeted disabilities (IWTDs) in non-law enforcement and non-Transportation Security Officer (TSO) positions. The Department exceeded hiring goals with IWDs representing 16.6 percent and IWTD representing 2.6 percent of all new hires. DHS ended the fiscal year with IWDs representing 14.75 percent of the total workforce. IWTDs represented 1.93 percent of the total workforce excluding law enforcement and TSO occupations.

DHS surpassed its 2 percent Schedule A hiring goal for all new hires in non-law enforcement and non-TSO positions. In FY 2023, Schedule A hires comprised 3.6 percent of all new hires in non-law enforcement and non-TSO positions.

Special Emphasis Observances

In FY 2023, DHS sponsored or co-sponsored the following special emphasis observances:

- National Native American Heritage Month program themed *Celebrating Culture, Respect, and Education*. The program featured a moderated discussion with senior leaders from DHS-HQ, ICE, and Navajo Technical University.

- National Black History Month Program, *Black Resistance*, co-sponsored with ICE, with a moderated panel discussion including senior DHS leaders from ICE, TSA, USSS, and DHS-HQ.

- National Women's History Month program, featuring guest speaker Erin Waters, Senior Director, External Affairs and Communications, DHS Office of Public Affairs, on the national theme, *Celebrating Women Who Tell Our Stories*. The program also featured a moderated discussion with DHS employees in the communications and public affairs field.

- National Asian American, Native Hawaiian, and Pacific Islander Heritage Month program, *Visible Together*. The program featured keynote speaker, Deputy Secretary John Tien. The event also featured a moderated panel discussion with senior leaders from CISA, ICE and FEMA.

- LGBTQI+ Pride Month program, *Voices for Change, Advocating Inclusivity*, co-sponsored with CBP and DHS Pride (an employee association) featuring leadership from CBP and a panel of DHS employees.

- National Hispanic Heritage Month program co-sponsored with DHS Adelante (an employee association) with the national theme, *Unidos: Inclusivity for a Stronger Nation*, featuring guest speaker, María Luján, Director of Public Engagement, U.S. Office of Personnel Management.

- National Disability Employment Awareness Month Program under the national theme, *Disability — Part of the Equity Equation*. The program featured a moderated panel discussion and included Eve Hill, Esquire, with Brown, Goldstein & Levy, and founder of

Inclusivity Strategic Consulting; Robert Silverstein, Esquire, Principal, Powers Pyles Sutter & Verville P.C. and Legislative Counsel, Employer Assistance Resource Network on Disability Inclusion (EARN); and Rebecca Bond, Esquire, Chief, Disability Rights Section, Civil Rights Division, U.S. Department of Justice.

Career Development and Outreach

CRCL sponsors two Departmental Mentoring Programs: The Disability Mentoring Program and the Women in Law Enforcement Mentoring Program. These programs are described in more detail in Essential Element A – Demonstrated Commitment from Agency Leadership.

With respect to outreach and bringing awareness, in FY 2023:

- CRCL collaborated with the Pride in Federal Service Interagency Working Group, a forum for sharing resources and materials in support of lesbian, gay, bisexual, transgender, and gender nonconforming inclusion in federal employment.

- DHS supported events sponsored by the Department of Education's White House Initiative on Advancing Educational Equity, Excellence, and Economic Opportunity through Historically Black Colleges and Universities (Initiative). In FY 2023, DMS staff served as the central point of contact for all Initiative-related programs, activities, and reports as a member of the Initiative's Federal Interagency Working Group (IWG). As a result of this participation, increased outreach has taken place across DHS to HBCUs, in order to bring awareness of DHS careers (details/internships), grants to support research and campus safety at HBCUs, and additional funding opportunities many HBCUs had not previously taken advantage of for their respective schools.

- DMS staff represented the Department on the Federal Inter-Agency Holocaust Remembrance Committee Planning Team. The 30th Annual Federal Inter-Agency Holocaust Remembrance Program, held virtually and in-person, was titled, *Rays of Hope*, and featured two Holocaust survivors. U.S. Department of Justice moderated the program.

- OCHCO hosted the 2023 Human Capital Symposium and Awards Ceremony on September 20-21, 2023. U.S. Congressman Gerry Connolly (VA-11) gave opening remarks followed by a keynote panel, *Investing in People*, featuring the Chief Human Capital Officer, the Acting Executive Director for Customer Experience, the Chief Information Officer (CIO) and the Director for Customer Experience. Attendees were provided information on academic programs, including degree and certification programs (some with tuition discounts for DHS employees and eligible family members). The Department's Career Development Programs were featured including HR Academy, DHS Mentorship, Joint Duty, Joint Mission Fellows, rotation programs, and HR Training Sessions.

- DHS continued its commitment 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.

- DHS accomplished several key initiatives to further support and empower the EAs and expand awareness of the program. Initiatives included: 1) releasing an updated EA Directive and Instruction; 2) establishing an EA Engagement Strategic Plan for the DHS Deputy Secretary that includes a monthly engagement with department-wide EAs; 3) implementing a requirement for Component heads and deputies to have quarterly engagement activities with Department-wide and Component-specific EAs; and 4) establishing individual EA SharePoint sites to share information on EA missions and activities with all DHS employees.

Essential Element E - Efficiency

DHS evaluates the efficiency of its EEO programs through compliance, with annual training requirements for EEO counselors and EEO investigators, legal sufficiency of the EEO reports of investigation (ROI), use of Alternative Dispute Resolution (ADR), and monitoring of trends related to these areas.

EEO Complaints: Counseling, Investigations, and Reports of Investigation

In Part G of this report, DHS Components reported that when contractor EEO counseling or EEO investigations are untimely, they have procedures in place to hold contractor personnel accountable for noncompliance. Untimeliness in EEO counseling or EEO investigations conducted by staff have been attributed to lack of resources and funding. DHS Components are working with Department leadership to ensure approval of appropriate staffing levels to ensure that EEO complaints are consistently processed in an efficient manner. To ensure that the DHS EEO Counselors and EEO Investigators provide outstanding customer service to persons who require EEO services, the DHS EEO Directors Council (chaired by the Departmental EEOD Director – CRCL) designed and delivered Annual EEO Counselor and Investigator Refresher training to counselors and investigators from across the Department.

During FY 2023, CMAS provided quarterly feedback to DHS Components on the quality of their Reports of Investigation (ROI) using the ROI Feedback Tool (Tool).[1] Specific areas where the quality of the ROIs is reviewed include legal sufficiency and readability. The quality review analysts develop numerical ratings and provide narrative information if needed. CMAS continued to disseminate aggregate information on the quality of contractor-produced ROIs within the DHS EEO program to all Components.

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[1] The Tool, developed and launched by CMAS in FY 2016, allowed CMAS's Adjudication Analysts to assess and rate the quality of ROIs reviewed when preparing Final Agency Decisions (FADs) and has been recommended as a best practice of other federal agencies by the EEOC.

Alternative Dispute Resolution Program

DHS has established a robust alternative dispute resolution (ADR) program. In FY 2023, there were 2,446 EEO counseling cases. ADR was offered in 1,975 counseling cases (to1,891 individuals) Department-wide. ADR was accepted in 1,287 counseling cases, or 65.2 percent of the time, which is above the 50 percent benchmark established by the EEOC. To support use of ADR across the Department, DHS Components collectively recognized Conflict Resolution Month through various means including video vignettes, print media, and advertising using ADR to address workplace conflict on the Department's intranet site, DHS Connect.

The DHS ADR program has a Shared Neutrals program of collateral duty mediators to support the Departmental ADR program. This program provides an opportunity for employees across DHS to be trained in ADR and perform mediations across the Department. Mediators on the DHS Shared Neutrals roster conducted over 500 mediations in FY 2023.   The DHS ADR program trains mediators on the DHS Shared Neutrals roster on an annual basis. In addition to the mandatory quarterly mediator refresher trainings, mediators are also given information on trainings offered by external public and private organizations. The DHS ADR Program also created and distributed a quarterly ADR newsletter to the mediators on the Shared Neutrals roster and members of the DHS ADR community.

Anti-Harassment Program

DHS implements the Department's Anti-Harassment Directive by promptly and effectively addressing allegations of workplace harassment. All employees receive training that covers preventing and addressing harassment in the workplace. This training includes, but is not limited to, the Department's Anti-Harassment policy and reporting requirements, the Anti-Harassment Units' process when conducting inquiries into reports of harassment, and the role Employee Relations plays when addressing reports of harassment.

The DHS-HQ AHU received an unprecedented 91 new complaints in FY 2023. The DHS-HQ AHU closed 76 complaints with an average processing time of 166 days. The DHS-HQ AHU conducted four training sessions with the DHS Office of I&A to educate supervisors and managers on preventing and addressing harassment in the workplace.

In FY 2023, a Departmental review of all DHS anti-harassment programs was conducted. Results of the program review will be provided to DHS leadership in FY 2024.

Essential Element F - Responsiveness and Legal Compliance

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

The CMAS Compliance Program monitors Components' progress in the implementation of remedial relief following findings of discrimination and reports the Department's compliance

progress to the EEOC for EEOC-issued decisions in which unlawful discrimination was found. CMAS continued its collaboration with the EEOC's Compliance Officer to effectively address the Department's oldest cases pending full implementation.

"At final count, 97 percent of all final actions were timely issued, and 95 percent of FADs were timely issued, a significant increase from FY 2022 when 48 percent of the FADs were timely issued."

During FY 2023, CMAS issued a total of 1,400 final merit-based actions, including 465 final agency decisions (FADs). Seven of these final actions were merit FAD findings, and 20 implemented findings made by EEOC administrative judges. At final count, 97 percent of all final actions were timely issued, and 95 percent of FADs were timely issued, a significant increase from FY 2022 when 48 percent of the FADs were timely issued. In FY 2023, the average processing days for FADs was 44 days, compared to 191 days in FY 2022. FAD workload decreased in FY 2023, with 483 requests for FADs received in FY 2023, compared to the 525 requests received in FY 2022. CMAS also issued 376 procedural dismissal decisions and 20 settlement breach decisions.

Throughout FY 2023, CMAS also provided the Components with monthly reports on cases coming due for action to ensure the CMAS received timely FAD requests.

Number of FADs and FADs Timely Issued
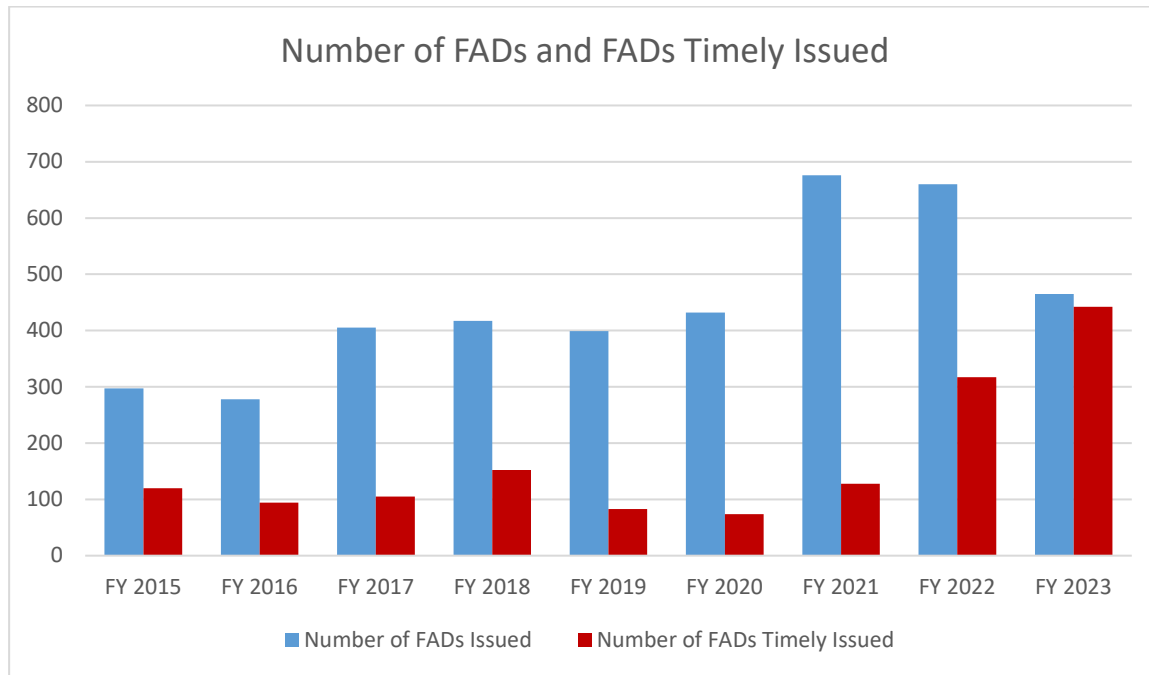
Part E.3 - Executive Summary: Workforce Analyses

Workforce Profile and Trend Analysis

This section outlines the DHS workforce-trend analysis conducted on the permanent employee workforce. Temporary employees are not included because, by virtue of their predestined separation, their inclusion is less relevant to the analysis of employee movements through the human capital lifecycle.

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

Workforce trend analysis presumes that parity is the ideal outcome. In the tables below, parity would result if each row in the table contained essentially the same number across the board. For example, assuming Black males make up 7.5 percent of the permanent DHS workforce, at parity, they would constitute an equal percentage of workforce attrition, promotions, low pay grades, middle pay grades, and high pay grades. If this is not occurring, it constitutes a trigger, which may suggest a possible EEO barrier. Multiple years of data are provided to allow for an assessment of trends for each ethnicity, race, and gender group, and for employees who report a disability or a targeted disability.

The percentages for pay grades listed in the tables encompass all pay plans used across DHS, except wage grade. Non-GS pay plan grades are mapped to their closest corresponding GS pay grade. The Department has utilized this approach since the DHS FY 2017 MD-715 report. Combining and harmonizing the pay plan grade designations allows for one set of ERI/G and disability tables that reflect most of the DHS permanent workforce. It also allows for consolidated trend analysis.

Additionally, both NCLF and RCLF statistics are provided as benchmarks. The NCLF consists of all persons over 16 years of age, who are not institutionalized or on active duty in the armed forces, and who either have a job or want a job. The RCLF is a weighted average of demographic statistics pertaining only to occupations seen within DHS. Note that for the FY 2021 and later MD-715 reports, the NCLF and the RCLF were retabulated using data from the 2014-2018 American Community Survey, following EEOC guidance.

The total permanent DHS workforce increased by 5,202 employees (2.66 percent) from 195,254[2] in FY 2022 to 200,456 in FY 2023.

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[2] This figure varies from the 194,345-count reported in the prior year MD-715 report due to updates made to the workforce data during the fiscal year.

DHS Permanent Workforce Trend for Hispanic or Latino Males								
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY23	15.9%	15.8%	13.2%	13.3%	8.7%	14.7%	19.8%	11.0%	6.6%
FY22	15.9%	13.8%	12.8%	13.6%	9.3%	14.1%	21.4%	11.1%	5.6%
FY21	15.8%	11.3%	12.1%	13.8%	9.4%	13.5%	21.6%	11.1%	6.1%
FY20	15.9%	10.0%	11.3%	14.3%	9.2%	13.5%	21.8%	11.1%	5.4%
FY19	16.0%	11.8%	12.7%	14.7%	9.5%	13.7%	21.9%	11.1%	5.6%
Hispanic Males – 15.9% of DHS, 6.8% of National Civilian Labor Force, 6.0% of Relevant Civilian Labor Force									

The workforce participation rate for Hispanic males at DHS is significantly above the NCLF and RCLF rates. In FY 2023, new hires were above the NCLF and RCLF, and attrition was below the workforce representation rate. However, the promotion rate for Hispanic males remained below the workforce participation rate. The representation of Hispanic males in Executive/Senior Leader pay grades remained significantly below the workforce participation rate. Higher grades are filled primarily through promotions at DHS. Analysis of the selections for GS 13-15 positions based on applicant flow data (data table A7) indicated that this group is being selected at or above their representation rate in the relevant applicant pools.

Hispanic males constitute 30 percent of the Customs and Border Protection Officers (CBPOs) and over half of Border Patrol Agents. CBPOs and Border Patrol Agents require fluency in Spanish for initial placements along the southern border, Florida, and Puerto Rico, a requirement that is not present in the standard RCLF comparison. This job requirement, in conjunction with the high percentage of jobs located in the southwest Border States, greatly increases Hispanic male and female representation in these occupations.

DHS Permanent Workforce Trend for Hispanic or Latino Females								
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY23	7.0%	9.1%	7.5%	9.5%	1.9%	11.1%	7.5%	4.3%	3.0%
FY22	6.8%	9.2%	7.4%	7.6%	2.3%	10.7%	6.4%	4.1%	2.7%
FY21	6.6%	7.7%	6.4%	7.7%	2.2%	10.4%	6.2%	4.0%	2.1%
FY20	6.5%	7.0%	6.7%	8.1%	2.8%	10.0%	6.2%	3.9%	1.8%
FY19	6.5%	8.1%	7.3%	9.0%	2.6%	10.0%	6.1%	3.8%	1.7%
Hispanic Females – 7.0% of DHS, 6.2% of National Civilian Labor Force, 4.6% of Relevant Civilian Labor Force									

The workforce participation rate for Hispanic females at DHS increased in FY 2023 and remains above the NCLF and RCLF participation rates. The hire rate remained above the NCLF and

RCLF. The attrition rate increased in FY 2023 and is above the participation rate. The promotion rate increased and continued to exceed the workforce participation rate.

Hispanic females participated at a higher-than-expected rate at pay grades GS 5-9 and GS 10-12 and participated at a lower-than-expected rate at pay grades GS 13 to SES, when compared to their workforce participation rate. The participation rates in the higher grades increased in FY 2023, continuing the 5-year upward trend. In addition, analysis of the selections for GS 13-15 positions based on applicant flow data (data table A7) indicated that this group is being selected at or above their representation rate in the relevant applicant pools.

DHS Permanent Workforce Trend for White Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY23	36.2%	29.1%	33.8%	29.8%	53.0%	25.4%	34.2%	43.6%	50.7%
FY22	36.7%	28.0%	34.4%	38.4%	52.9%	25.1%	37.4%	44.5%	51.1%
FY21	37.5%	33.3%	36.5%	36.7%	51.7%	26.5%	37.7%	45.4%	53.8%
FY20	37.8%	37.5%	35.7%	36.2%	49.5%	27.5%	37.7%	46.0%	55.8%
FY19	37.7%	33.3%	34.4%	33.0%	49.9%	26.8%	38.1%	46.5%	55.3%
White Males – 36.2% of DHS, 35.7% of National Civilian Labor Force, 39.6% of Relevant Civilian Labor Force									

The White male workforce participation rate at DHS continued to decrease in FY 2023. It is above the NCLF rate but below the RCLF rate. The hiring rate increased but remained below the NCLF and RCLF rates. The promotion rate decreased and moved below the workforce participation rate.

White males' participation rate was lower than the expected rate at the GS 5-9 pay grades and higher than the expected rate at the GS 13–15 and Executive/Senior Leader grades. The participation rate at grades GS 13–15 and Executive/Senior Leader grades has been trending downward for the White male group and continued to decrease in FY 2023.

DHS Permanent Workforce Trend for White Females								
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY23	15.6%	16.2%	15.2%	15.7%	9.2%	17.3%	13.4%	18.3%	24.2%
FY22	15.4%	14.8%	16.1%	18.0%	9.8%	16.2%	13.2%	17.9%	24.2%
FY21	15.5%	16.4%	17.8%	17.0%	10.6%	17.0%	13.3%	17.5%	21.9%
FY20	15.7%	18.9%	17.5%	17.3%	12.0%	17.4%	13.4%	17.3%	20.8%
FY19	15.6%	17.2%	16.9%	17.0%	12.3%	17.4%	13.2%	17.2%	22.0%
White Females – 15.6% of DHS, 31.8% of National Civilian Labor Force, 31.2% of Relevant Civilian Labor Force								

The White female participation rate at DHS was significantly lower than the NCLF and RCLF rates. The hire rate was above the participation rate but is behind the NCLF and RCLF rates. The attrition rate continued to decrease in FY 2023 and moved below the participation rate. The White female promotion rate continued to be above the participation rate, with White females represented at higher-than-expected rates in the higher pay grades. Their participation rate was highest at the Executive/Senior Leader pay grades.

DHS Permanent Workforce Trend for Black or African American Males								
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY23	7.9%	9.8%	9.8%	9.1%	16.5%	8.8%	8.1%	7.1%	6.1%
FY22	7.9%	10.1%	9.2%	7.0%	14.6%	9.8%	7.1%	7.0%	6.0%
FY21	7.7%	9.7%	8.7%	7.5%	13.8%	9.6%	6.9%	7.0%	6.4%
FY20	7.6%	7.5%	9.3%	7.3%	13.8%	9.3%	6.8%	6.9%	6.5%
FY19	7.7%	8.8%	9.4%	7.9%	15.0%	9.5%	6.8%	6.9%	6.1%
Black Males – 7.9% of DHS, 5.7% of National Civilian Labor Force, 5.0% of Relevant Civilian Labor Force								

In FY 2023, the workforce participation rate and hire rate of Black males at DHS remained above the NCLF and RCLF participation rates. The attrition rate remained above the participation rate, as it has since 2010, and increased in 2023. Representation at higher grades GS 13-15 remained below the overall representation rate. The overall promotion rate increased in FY 2023 and surpassed the onboard representation rate. Analysis of the selections for GS 13-15 positions based on applicant flow data (data table A7) indicated that this group is being selected at or above their representation rate in the relevant applicant pools.

DHS Permanent Workforce Trend for Black or African American Females								
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY23	8.8%	12.1%	11.8%	11.2%	5.5%	12.0%	8.4%	8.0%	3.9%
FY22	8.7%	12.6%	12.0%	7.4%	5.7%	13.2%	6.6%	7.8%	3.9%
FY21	8.6%	11.4%	10.8%	8.4%	6.4%	13.1%	6.5%	7.6%	4.0%
FY20	8.6%	10.2%	11.7%	8.4%	7.1%	12.8%	6.5%	7.5%	4.2%
FY19	8.6%	11.2%	11.3%	9.8%	6.1%	13.1%	6.4%	7.4%	4.2%
Black Females – 8.8% of DHS, 6.6% of National Civilian Labor Force, 5.7% of Relevant Civilian Labor Force								

The workforce participation rate of Black females at DHS has increased slightly since FY 2021 and has been consistently above the NCLF and RCLF participation rates. This group was hired at a rate that was above the NCLF and RCLF. The promotion rate rose above the representation in the workforce in FY 2023. Black females continue to have a higher-than-expected attrition rate. This group also had lower than expected participation in higher-graded positions. Analysis of the selections for GS 13-15 positions based on applicant flow data (data table A7) indicated that this group is being selected at or above their representation rate in the relevant applicant pools. The participation rate has steadily trended upward in GS 10-12 and GS 13-15 positions.

DHS Permanent Workforce Trend for Asian Males								
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY23	4.0%	4.1%	3.6%	4.6%	2.3%	4.4%	4.3%	3.5%	2.6%
FY22	4.0%	4.6%	3.6%	3.6%	2.8%	4.7%	4.0%	3.4%	2.5%
FY21	3.9%	4.3%	3.3%	4.0%	3.2%	4.4%	3.9%	3.4%	2.0%
FY20	3.8%	3.8%	3.5%	3.9%	3.7%	4.3%	3.9%	3.4%	2.0%
FY19	3.8%	4.3%	3.6%	3.9%	2.8%	4.2%	3.9%	3.3%	1.8%
Asian Males – 4.0% of DHS, 2.2% of National Civilian Labor Force, 2.5% of Relevant Civilian Labor Force								

In FY 2023, Asian males were represented in the DHS permanent workforce at a rate above the NCLF and RCLF rates. Attrition remained below, while the promotion rate rose above, the participation rate.

Asian males are participating at the GS-13 and higher pay grades below their overall participation rate, while their participation in grades GS 13-15 and at the Executive/Senior Leader level increased in FY 2023. Analysis of the selections for GS 13-15 positions based on applicant flow data (data table A7) indicated that this group is being selected at or above their representation rate in the relevant applicant pools.

DHS Permanent Workforce Trend for Asian Females								
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY23	2.3%	2.9%	1.9%	2.4%	0.8%	3.1%	1.9%	2.5%	2.0%
FY22	2.2%	2.9%	1.9%	2.4%	0.4%	2.7%	1.8%	2.4%	2.2%
FY21	2.1%	2.2%	1.8%	2.4%	0.8%	2.5%	1.8%	2.2%	2.2%
FY20	2.1%	2.4%	1.9%	2.4%	0.6%	2.5%	1.7%	2.2%	1.8%
FY19	2.0%	2.6%	1.8%	2.3%	0.4%	2.4%	1.7%	2.1%	1.6%
Asian Females – 2.3% of DHS, 2.2% of National Civilian Labor Force, 2.5% of Relevant Civilian Labor Force								

The participation rate for Asian females increased in FY 2023 to exceed the NCLF rate while remaining below the RCLF rate. The hire rate was unchanged in FY 2023 but exceeded both the NCLF and RCLF benchmarks. In FY 2023, attrition remained below the participation rate.

The rate of promotions of Asian females was higher than their workforce participation rate. The group was spread proportionately throughout the pay grades, with representation near parity at the higher grades.

DHS Permanent Workforce Trend for Native Hawaiian or Other Pacific Islander Males								
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY23	0.40%	0.44%	0.40%	0.52%	0.22%	0.50%	0.47%	0.22%	0.29%
FY22	0.39%	0.67%	0.44%	0.32%	0.33%	0.55%	0.41%	0.21%	0.30%
FY21	0.37%	0.48%	0.39%	0.39%	0.22%	0.48%	0.41%	0.21%	0.30%
FY20	0.36%	0.30%	0.39%	0.31%	0.00%	0.48%	0.39%	0.21%	0.31%
FY19	0.37%	0.48%	0.28%	0.40%	0.00%	0.50%	0.37%	0.21%	0.32%
Pacific Islander Males – 0.40% of DHS, 0.1% of National Civilian Labor Force, 0.09% of Relevant Civilian Labor Force								

Since FY 2018, Native Hawaiian/Pacific Islander males at DHS have been represented at over three times the NCLF rate. In FY 2023, the hire rate remained above the participation rate. The attrition rate decreased and matched the onboard rate in FY 2023.

Native Hawaiian/Pacific Islander males' promotion rate increased and rose above their participation rate in FY 2023. Representation at grades 13-15 remained below the participation rate. Analysis of the selections for GS 13-15 positions based on applicant flow data (data table A7) indicated that this group is being selected at or above their representation rate in the relevant applicant pools. Executive/Senior Leader representation has been trending slightly downward in recent years.

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

| DHS Permanent Workforce Trend for Native Hawaiian or Other Pacific Islander Females | | | | | | | | |
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY23	0.28%	0.43%	0.36%	0.52%	0.11%	0.52%	0.32%	0.11%	0.00%
FY22	0.27%	0.50%	0.34%	0.24%	0.00%	0.57%	0.20%	0.11%	0.00%
FY21	0.26%	0.51%	0.33%	0.30%	0.11%	0.55%	0.18%	0.10%	0.00%
FY20	0.25%	0.26%	0.28%	0.21%	0.00%	0.52%	0.17%	0.09%	0.00%
FY19	0.25%	0.39%	0.35%	0.27%	0.00%	0.50%	0.18%	0.09%	0.00%
Pacific Islander Females – 0.28% of DHS, 0.1% of National Civilian Labor Force, 0.07% of Relevant Civilian Labor Force									

Native Hawaiian/Pacific Islander females' participation and hire rates continue to exceed the NCLF and RCLF rates in FY 2023. The attrition rate remains above the participation rate.

Native Hawaiian/Pacific Islander females were promoted above the participation rate in FY 2023. The group continues to participate at a lower-than-expected rate in the higher pay grades. Analysis of the selections for GS 13-15 positions based on applicant flow data (data table A7) indicated that this group is being selected at or above their representation rate in the relevant applicant pools.

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

| DHS Permanent Workforce Trend for American Indian or Alaskan Native Males | | | | | | | | |
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY23	0.63%	0.79%	0.69%	0.59%	0.45%	0.70%	0.59%	0.63%	1.15%
FY22	0.62%	0.76%	0.84%	0.58%	0.44%	0.62%	0.60%	0.63%	1.09%
FY21	0.63%	0.88%	0.64%	0.57%	0.44%	0.58%	0.62%	0.66%	0.71%
FY20	0.60%	0.65%	0.58%	0.50%	0.48%	0.51%	0.62%	0.63%	0.83%
FY19	0.59%	0.51%	0.67%	0.53%	0.41%	0.51%	0.61%	0.63%	0.76%
American Indian/Alaskan Native Males – 0.63% of DHS, 0.3% of National Civilian Labor Force, 0.3% of Relevant Civilian Labor Force									

The tabulation of the NCLF and RCLF rates using 2014-2018 American Community Survey data, per EEOC guidance, lowered the NCLF and RCLF rates for this group by 50 percent

compared to the 2010 census data. As a result, American Indian/Alaskan Native male representation is substantially above the NCLF and RCLF participation rates. The hire rate is also well above the NCLF and RCLF rates and the onboard rate. Attrition decreased in FY 2023 while the promotion rate remained below the participation rate.

American Indian/Alaskan Native males were represented evenly throughout the range of pay grades, with participation at the higher grades remaining at or above the participation rate.

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

DHS Permanent Workforce Trend for Native American Indian or Alaskan Native Females								
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY23	0.35%	0.51%	0.46%	0.43%	0.11%	0.56%	0.30%	0.31%	0.19%
FY22	0.34%	0.58%	0.39%	0.36%	0.00%	0.51%	0.25%	0.30%	0.20%
FY21	0.32%	0.59%	0.44%	0.32%	0.11%	0.47%	0.27%	0.26%	0.20%
FY20	0.31%	0.63%	0.36%	0.34%	0.12%	0.45%	0.25%	0.25%	0.31%
FY19	0.30%	0.38%	0.36%	0.35%	0.14%	0.43%	0.24%	0.24%	0.11%
American Indian/Alaskan Native Females – 0.35% of DHS, 0.3% of National Civilian Labor Force, 0.25% of Relevant Civilian Labor Force								

The tabulation of the NCLF and RCLF rates using 2014-2018 American Community Survey data, per EEOC guidance, lowered the NCLF and RCLF rates for this group by 50 percent compared to the 2010 census data. As a result, American Indian/Alaskan Native female representation is above the NCLF and RCLF participation rates. The hire rate exceeded the NCLF and RCLF rates in FY 2023 while the attrition rate continued to be higher than the participation rate. The promotion rate was above the workforce participation rate. American Indian/Alaskan Native females were overrepresented at Grades 5-9 and underrepresented at all other grade levels. Analysis of the selections for GS 13-15 positions based on applicant flow data (data table A7) indicated that this group is being selected at or above their representation rate in the relevant applicant pools.

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

DHS Permanent Workforce Trend for Individuals with Disabilities								
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY23	15.43%	15.65%	17.75%	10.85%	5.57%	15.32%	12.46%	19.91%	13.42%
FY22	14.75%	14.99%	15.71%	14.15%	5.66%	11.32%	14.03%	18.51%	12.07%
FY21	14.22%	16.14%	16.93%	12.98%	5.56%	10.96%	13.78%	17.51%	12.45%
FY20	13.68%	15.69%	16.55%	14.23%	5.74%	10.77%	13.30%	16.71%	11.16%
FY19	13.03%	12.05%	13.79%	14.35%	7.71%	10.31%	12.71%	15.87%	10.61%
Individuals with Disabilities – 15.43% of DHS, 21.81% excluding LEOs and TSA TSOs, 9.13% of the Federal government in 2019,[3] 12.0% EEOC Goal								

The representation of individuals with disabilities continued to climb in FY 2023, rising to 15.43 percent for the permanent workforce, and 21.81 percent when excluding law enforcement occupations and TSA Transportation Security Officers, who have physical entry requirements. These percentages include employees who have self-identified as having a disability, disabled veterans with a Department of Veterans Affairs (VA) certified disability, and employees appointed under a disability-based Schedule A hiring authority.

DHS employees with disabilities continued to separate at higher rates than their workforce participation rate in FY 2023. Hires increased and remained above the 12.0% EEOC goal, while the promotion rate decreased. Employees with disabilities are notably above parity in the GS 13-15 grades, with representation at these grades continuing to climb. Employees with disabilities are participating at a lower-than-expected rate at the Executive/Senior Leader level but exceed the 12.0% EEOC goal.

DHS Permanent Workforce Trend for Individuals with Targeted Disabilities								
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY23	1.30%	1.51%	1.69%	0.92%	1.11%	1.61%	0.99%	1.58%	1.34%
FY22	1.27%	1.37%	1.49%	0.99%	1.31%	1.28%	1.09%	1.43%	1.09%
FY21	1.25%	1.44%	1.74%	0.88%	1.20%	1.26%	1.09%	1.39%	0.61%
FY20	1.25%	1.19%	1.77%	1.06%	1.56%	1.30%	1.08%	1.38%	0.63%
FY19	1.26%	1.08%	1.59%	1.14%	2.03%	1.31%	1.10%	1.35%	1.08%
Individuals with Targeted Disabilities – 1.30% of DHS, 1.97% excluding LEOs and TSA TSOs, 1.80% of the Federal government in 2019,[4] 2.0% EEOC Goal								

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[3] EEOC Annual Report on the Federal Workforce Fiscal Year 2018.
[4] EEOC Annual Report on the Federal Workforce Fiscal Year 2018.

The percentage of the DHS workforce that self-identifies as having a targeted disability is below both the Federal government workforce benchmark and the EEOC's goal of 2.0 percent. The participation rate dropped from FY 2019 to FY 2021 but increased in FY 2022 and FY 2023. Excluding law enforcement officers and TSOs, the overall FY 2023 participation rate is 1.97 percent, .03 percent short of the 2.0 percent EEOC goal. Hires increased in FY 2023 and remained below the 2.0 percent federal goal; however, when excluding law enforcement officers and TSOs, DHS exceeded the 2.0 percent goal, representing 2.50 percent of permanent hires. Further, Schedule A hires comprised 5.29 percent of permanent new hires in non-law enforcement and non-TSO positions. The attrition rate of IWTDs remained above their participation in FY 2023.

Representation of IWTDs for the GS 13-15 grades is above the overall participation rate and is also above for the Executive/Senior Leader grades. IWTD representation in promotions is below the overall participation rate.

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

Group	% of Permanent Workforce (Participation Rate)	% of Hires	% of Attrition	% of Promotions	% of GS 13-Exec/Sr. Lead
Summary of Triggers Identified in Workforce Trend Tables (FY 2019- FY 2023) Entries indicate a trigger; no entry indicates no trigger					
Hispanic Male				Below Participation Rate Trending Down	Below Participation Rate No Trend
Hispanic Female			Above Participation Rate Trending Up		Below Participation Rate Trending Up
White Male	Below RCLF Trending Down	Below NCLF/RCLF No Trend		Below Participation Rate	
White Female	Below NCLF/RCLF No Trend	Below NCLF/RCLF No Trend			
Black Male			Above Participation Rate Trending Up		Below Participation Rate Trending Up (GS13-15); No Trend (Executive/SL)
Black Female			Above Participation Rate No Trend		Below Participation Rate Trending Up (GS13-15); Trending Down (Executive/SL)
Asian Male					Below Participation Rate Trending Up
Asian Female	Below RCLF/Met NCLF Trending Up				Below Participation Rate (Executive/SL)
Native Hawaiian/Pacific Islander Male*					Below Participation Rate No Trend

Native Hawaiian/Pacific Islander Female*			Above Participation Rate Trending Up		Below Participation Rate Trending Up
Native American Male*			Above Participation Rate No Trend	Below Participation Rate Trending Up	
Native American Female*			Above Participation Rate No Trend		Below Participation Rate Trending Up (GS13-15); No Trend (Executive/SL)
Individuals with Disabilities				Below Participation Rate No Trend	Below Participation Rate Trending Up (Executive/SL)
Individuals with Targeted Disabilities	Below EEOC 2.0% Goal	Below EEOC 2.0% Goal	Above Participation Rate No Trend	Below Participation Rate No Trend	

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

Higher than expected attrition rates for some minority groups and lower than expected participation rates in the higher pay grades for almost all minority groups continued in FY 2023. Participation in higher grades has consistently increased for several minority groups in recent years. In addition, analysis of the selections for GS 13-15 positions based on applicant flow data (data table A7) indicated that all minority groups are being selected at or above their representation rate in the relevant applicant pools.

For FY 2023, DHS developed Part I.1, which captures the Department-level efforts to support and assist Components in conducting their own barrier analyses. CRCL will continue and enhance the ongoing activities that support Component barrier analysis, including: providing consultation and staff resources, conducing annual technical assistance visits, tabulating and reporting on the DHS Barrier Analysis Performance Metric, providing workforce and applicant flow data and analytics, developing tools such as barrier analysis questionnaires and focus group scripts for Component use, and conducting basic and advanced barrier analysis training/workshop sessions. CRCL has found that the policies, procedures, and practices that most directly impact 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. If a Component identifies a department-wide policy/procedure as a potential barrier, DHS will conduct the appropriate barrier analysis at that time.

Part I.3 of this report, which is carried over from previous years, notes triggers for separation rates for several minority groups and women. The barrier analysis for Part I.3 resulted in findings relating to issues with supervision/management, lack of advancement opportunities,

personal/family related reasons, insufficient work/life programs, and lack of alternate work schedules. DHS noted that separation demographics were inconsistent across the Components. As a result, DHS plans to phase out this Part I based on: 1) the creation of the new Part I that captures the Department-level efforts to support and assist Components in conducting their own barrier analyses, 2) that the Department-level activities of working with the Components to review FEVS data and develop Component Engagement Plans is an ongoing annual activity, and 3) policies, practices, and procedures related to the issues identified reside at the Component level and are Component specific.

Lower-than-expected representation at the GS 13-15 and higher pay grades is seen in nine of the ten minority groups. DHS expects the upward trend seen in the representation of most minority groups in higher grades to continue. As shown in workforce table A4-1, the feeder pool grades for higher grades are more diverse than the grades they feed, portending a more diverse group of employees at higher grades in the future. Promotion rates for these groups show a different pattern with only three minority groups having promotions rates below their overall participation rates. Issues regarding representation in higher grades are identified in Component reports, where appropriate, with CRCL aiding in ongoing barrier identification and reduction efforts.

Given the high-graded occupations that are largely Component-specific, the existence of Component plans to address the issue (Part Is), and a persistent upward trend in representation of women and minorities in higher grades, a new plan to address the issue (Part I) at the Department level was not created to address this trigger.

DHS Exit Survey and Federal Employee Viewpoint Survey Results

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 ICE) 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 Component-level MD-715 reports or obtained from Components directly. Examination of FY 2023 exit survey data from the DHS Exit Survey indicates that the top non-retirement reasons for exiting DHS were: 1) supervisor/manager, 2) lack of advancement opportunities, and 3) personal or family related.

The 2023 Federal Employee Viewpoint Survey (FEVS) results were generally positive for DHS this year. The survey was administered as a census and DHS had an overall response rate of 44 percent, which is above the 39 percent Governmentwide average and above the 36 percent DHS response rate last year. The DHS-wide Employee Engagement Index (EEI) increased from 64% in 2022 to 67% in 2023. The Governmentwide EEI increased one percentage point. The Global Satisfaction Index (GSI) was 60 percent for 2023. The GSI increased six percentage points from 2022. DHS consistently trends below the Governmentwide average, largely driven by scores at CBP, TSA, and ICE. The largest increase was at TSA, which went from 39% in 2022 to 54% in 2023.

The Diversity Equity Inclusion and Accessibility (DEIA) index, introduced in 2022, replaces the New IQ which was dropped from the FEVS in 2019. The DHS-wide DEIA score increased two

percentage points to 65 percent positive. Component DEIA scores increased almost across the board, with TSA showing the largest increase of four percentage points. CISA, DHS HQ, FEMA, USCG, and USCIS all exceeded the governmentwide DEIA average.

The 2022 FEVS is the most recent FEVS results available that are broken out by demographic groups. Women reported higher scores on the core survey questions (64.8 percent vs. 61.2 percent for males) but slightly lower overall on the new DEIA questions (63.2 percent vs. 64.0 percent for males). Black respondents answered more positively to the core questions (66.0 percent vs. 62.2 percent for White respondents), but Black and All Other Group respondents answered less positively on the DEIA questions (64.3 percent for White, 63.7 percent for Black, and 61.1 percent for All Others).

The 2022 Best Places to Work in Federal Government rankings is the most current update as of the writing of this report. The Best Places to Work in Federal Government rankings, which are based on FEVS results, ranked DHS 16th out of 17 large agencies.[5] The overall score of 54.9 was based on three FEVS questions chosen for their ability to predict intent to remain in the organization.

Women in Law Enforcement

In FY 2023, among law enforcement personnel positions eligible for 6(c) retirement benefits[6], women occupied approximately 10.01 percent at DHS, which represents a modest increase of 0.21 percentage points or 2.14 percent from FY 2022. In FY 2023, among all law enforcement personnel[7], women occupied approximately 13.7 percent of law enforcement officer positions at DHS, which represents an increase of 0.2 percentage points from 13.5 percent in FY 2022. However, the female participation rate at DHS remains slightly below the rate of women in law enforcement positions across the Federal government which is 14.5 percent.[8]

The participation rate of women in Criminal Investigator (series 1811) law enforcement positions at DHS is also lower than the occupational civilian labor force participation rate for criminal investigators, which is 23.63 percent.[9] In FY 2023, women constituted 15.05 percent of permanent criminal investigators in the DHS workforce. In other law enforcement positions at DHS, women make up 11.16 percent of the General Inspection (1801) job series, 26.89 percent

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[5] DHS's score lowered by 0.6 points from 2021 to 2022. The Best Places to Work score is based on responses to three FEVS questions: I recommend my organization as a good place to work.; Considering everything, how satisfied are you with your job?; and, Considering everything, how satisfied are you with your organization? The Partnership for Public Service uses a proprietary weighted formula for combining the results of these three questions.

[6] Law Enforcement Officer (LEO) is defined in Title 5 as follows: an employee whose duties "are primarily the investigation, apprehension, or detention of individuals suspected or convicted of offenses against the criminal laws of the United States, or the protection of officials of the United States, against threats to personal safety." See 5 U.S.C. § 8336(c) or § 8412(d) (2011).

[7] DHS defines "law enforcement personnel" as employees authorized to enforce the laws of the United States, carry firearms, and make criminal arrests in the performance of their assigned duties.

[8] See Bureau of Justice Statistics, *Federal Law Enforcement Officer2, 2020 – Statistical Tables,* 2023.

[9] Occupational Civilian Labor Force participation for series 1811 Criminal Investigators is based on 2018 Census American Community Survey data.

of the Customs and Border Protection Officer (1895) series, and 6.24 percent of the Border Patrol Agent (1896) job series.

In FY 2023, DHS expanded its campaign to increase the representation of women in law enforcement positions across the Department. Led by OCHCO, a DHS-only Women in Law Enforcement (WLE) Summit and Department-wide Joint Hiring Event were held in Arlington, TX. The inaugural WLE Summit, held on August 21, 2023, was attended by women law enforcement officers from every DHS Component. More than 150 women participated in the Summit during which the Senior Official Performing the Duties of the Deputy Secretary Kristie Canegallo provided remarks. The day was filled with moderated panels of career and senior women in law enforcement who shared their personal and professional journeys. The senior executive panel's discussion, moderated by the DHS Assistant Secretary in the Office for State and Local Law Enforcement, was titled *Women in Law Enforcement, Current State- Recruiting, Retention, Total Well Being*. One session focused on Personal Power and Impactful Leadership. The Summit also featured a Body Armor demonstration from the S&T National Urban Security Technology Laboratory. The 2-day Joint Hiring Event focused on the recruitment of women helped result in a FY2023 hiring percentage of 13.52% for women in law enforcement positions.

In a show of support for the DHS Women in Law Enforcement Mentoring Program, the Senior Official Performing the Duties of Deputy Secretary Canegallo agreed to serve as one of its Executive Champions. This career development program was created specifically for women in the DHS law enforcement workforce and launched in FY 2019. The 6th cohort of the WLE Mentoring Program will deploy in January 2024.

Data Sources

The workforce numbers used in this report were obtained using DHS's workforce data application, Tableau, and are based on data extracted from the National Finance Center (NFC) for FY 2023. For the first time, data for the non-appropriated workforce at USCG was obtained from USCG and integrated into all the MD-715 data tables. DHS employees voluntarily submitted all race, national origin, gender, and disability data relied on in this report. To better capture the number of IWDs, DHS also identified employees who are disabled veterans with entitlement of preference points (as determined by the Veterans Administration) or who were hired under the Schedule A hiring authority and did not report a disability through the self-identification process. These individuals are counted in the workforce tables as having a non-targeted disability. Starting in FY 2022, DHS counted Veteran Preference Codes 3 and 4 in addition to Code 6, as was done in recent years. This change brought DHS's tabulation method in line with the procedure used by the EEOC. The trend table for individuals with disabilities included in this report includes updated percentages for all prior years. Statistics on IWDs/IWTDs in the Federal government were obtained from the EEOC Annual Report on the Federal Workforce Fiscal Year 2019.

Applicant flow data presented in this report were extracted from USA Staffing for the following DHS Components: CBP, CISA, ICE, TSA, and DHS HQ. Data was also extracted from Monster Government Solutions for the following DHS Components: FEMA, FLETC, TSA, USCG, and USSS. Note that in FY 2023, TSA used USA Staffing only for Transportation Security Officer announcements.

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

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

Conclusion

DHS leadership is proud of its accomplishments in the areas of attracting, developing, and retaining an increasingly diverse workforce. DHS's overall increase in the representation of women, minorities, and individuals with disabilities is a significant accomplishment. This report identifies accomplishments, but also identifies several challenges requiring attention, including enhancing existing career development programs and other retention initiatives, addressing retention of women, and increasing the participation of individuals with targeted disabilities. The plans in Parts I and J address these issues.

Part F: Certification and Signatures

CERTIFICATION of ESTABLISHMENT of CONTINUING EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS

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

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

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

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

Veronica Venture (signature)	4/26/24
Signature of Principal Equal Employment Opportunity Director/Official Veronica Venture Deputy Officer, Office for Civil Rights and Civil Liberties Director, Equal Employment Opportunity and Diversity U.S. Department of Homeland Security Certifies that this Federal Agency Annual Equal Employment Opportunity Program Status Report is in compliance with Management Directive 715	Date
Alejandro N. Mayorkas (signature)	4/24/2024
Signature of Agency Head or Agency Head Designee Alejandro Mayorkas Secretary U.S. Department of Homeland Security	Date

Part G: Agency Self-Assessment Checklist

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

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

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

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

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

MD-715 - PART G
Agency Self-Assessment Checklist

Essential Element A: Demonstrated Commitment from Agency Leadership **This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.**			
➡ Compliance Indicator ⬇ Measures	**A.1 – The agency issues an effective, up to date EEO policy statement.**	**Measure Met? (Yes/No/NA)**	**Comments**
A.1.a	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "yes," please provide the annual issuance date in the comments column. [see MD-715, II(A)]	Yes	**DHS** Issued 10/11/2022. **CBP** Issued 8/24/2023. **CISA** Issued 6/20/2023. **FEMA** Issued 7/20/2023. **FLETC** Issued 11/22/2022. **HQ** Issued 10/11/2022. **ICE** Issued 7/2/2022. The director of ICE retired in late summer and the new acting Director was in place by August 2023. Policy with Acting Director's signature is in place and was re-issued 1/10/2024. **TSA** Issued 5/15/2023. **USCG** Issued 09/27/2023. **USCIS** Issued 10/14/2022.

			USSS Issued 11/21/2022 and 6/8/2023.
A.1.b	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation, and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 C.F.R. § 1614.101(a)]	Yes	
Compliance Indicator ➡️ ⬇️ **Measures**	**A.2 – The agency has communicated EEO policies and procedures to all employees.**	**Measure Met? (Yes/No/NA)**	**Comments**
A.2.a	Does the agency disseminate the following policies and procedures to all employees?		
A.2.a.1	Anti-harassment policy? [See MD-715, II(A)]	Yes	
A.2.a.2	Reasonable accommodation procedures? [See 29 C.F.R § 1614.203(d)(3)]	Yes	
A.2.b	Does the agency prominently post the following information throughout the workplace and on its public website?		
A.2.b.1	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [See 29 C.F.R § 1614.102(b)(7)]	Yes	
A.2.b.2	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	Yes	
A.2.b.3	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	Yes	**DHS** https://www.dhs.gov/reasonable-accommodations-dhs **CBP** www.cbp.gov/about/eeo-diversity/reasonable-accommodation **CISA** Office of Equity, Diversity, Inclusion and Accessibility (OEDIA) | CISA **FEMA** Reasonable Accommodation | FEMA.gov

				FLETC [Reasonable Accommodation Request Procedures | Federal Law Enforcement Training Centers (fletc.gov)](https://www.fletc.gov) **HQ** https://www.dhs.gov/reasonable-accommodations-dhs **ICE** [Office of Diversity and Civil Rights | ICE](https://www.ice.gov) **TSA** Internal: https://ishare.tsa.dhs.gov/Offices/HumanCapital/HumanCapPolicy/Pages/HumanResourcesLetters,BulletinsGuidance.aspx External: https://www.tsa.gov/about/jobs-at-tsa **USCG** [U.S. COAST GUARD CIVIL RIGHTS MANUAL, COMDTINST M5350.4E (uscg.mil)](https://www.uscg.mil) (Pgs. 6.5-6.23) **USCIS** https://cisgov.sharepoint.com/sites/connect/org/MGMT/OEOI/Documents/MD%20256-006.pdf **USSS** https://www.secretservice.gov/join/diversity
A.2.c	Does the agency inform its employees about the following topics:			
A.2.c.1	EEO complaint process? [See 29 29 C.F.R. §§ 1614.102(a)(12) and 1614.102(b)(5)] If "yes", please provide how often.		Yes	**CBP** Quarterly in pay stubs, posters are posted in duty stations, information and Frequently Asked Questions are posted

			prominently on cbp.gov and notice of EEO rights are identified in action letters. **CISA** Provided bi-weekly during new employee orientation and bi-annually otherwise. **FEMA** Provided on the intranet on an ongoing basis and annually during mandatory EEO employee course training and provided bi-weekly during new employee/supervisor orientation. **FLETC** Initially at New Employee Orientation twice per month, FLETC New Supervisor Training one to two times per year, and posted on both Internet and Intranet, and EEO Posters. **HQ** During new employee orientation and when training is requested. **ICE** Complaint process is on the intranet site and is discussed bi-weekly during new employee orientation, during mandatory training for new managers and supervisors, during site visits, ad hoc requests for training including online training and notice of EEO rights are identified in action letters. **TSA** Provided every two weeks during new employee orientation in addition to the biennial No FEAR Act training. **USCG** The Civil Rights Awareness Training is provided twice a month one for supervisors and other for employees.

				USCIS Provided during the onboarding process. **USSS** •Anti-Harassment Training (Monthly) •Cornerstone Leadership Training (Monthly) •EEO Intake Process •EEO Posters •Internal and External Websites •New Employee Orientation •New Supervisors Training (Monthly) •Uniform Division Leadership Training (Monthly) •Uniformed Division Introductory Training Course and Special Agent Introductory Training Course (twice per month).
A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If "yes", please provide how often.		Yes	**CBP** At least annually in pay stubs, information and FAQs are posted prominently on www.cbp.gov, and complainants are notified during the complaint process. **CISA** This is shared in EEO compliance training and on the OEDIA intranet site. **FEMA** Provided on the intranet on an ongoing basis and annually during mandatory EEO employee course training and provided bi-weekly during new employee/supervisor orientation. **FLETC** During new employee orientation, FLETC New Supervisor Training. Provided slide presentation to managers and provided virtual training sessions for employees and managers. **HQ** During new employee orientation and when training is requested.

			ICE Policies are disseminated during the bi-weekly new employee orientation, and information is on the ODCR intranet page. New managers and supervisors are informed during mandatory training sessions and Complainants are notified during the complaint process. **TSA** Provided at least once every two weeks/twenty-six times per year during new hires orientation in addition to our biennial No FEAR Act training. **USCG** Provides Civil Rights training twice a month, one for supervisors and another for employees. **USCIS** During bi-annual training for managers and on internal agency website. **USSS** •Anti-Harassment Training (Monthly) •Cornerstone Leadership Training (Monthly) •Early Dispute Resolution Policy (EDRP) •EEO Intake Process •EEO Posters •Internal and External Websites •New Employee Orientation •New Supervisors Training (Monthly) •Uniform Division Leadership Training (Monthly) •Uniformed Division Introductory Training Course and Special Agent Introductory Training Course (twice per month)
A.2.c.3	Reasonable accommodation program? [See 29 29 C.F.R. § 1614.203(d)(7)(ii)(C)] If "yes", please provide how often.	Yes	**CBP** Employees are informed at least annually in pay stubs; information and FAQs

				are posted prominently on cbp.gov; and on-going RA training for managers and employees. **CISA** During Core Academy training and supervisory training. **FEMA** Provided on the intranet on an ongoing basis and provided bi-weekly during new employee/supervisor orientation. **FLETC** Initially at new employee orientation, FLETC new supervisor training, posted on both internet and intranet, during employee and supervisor training as needed and in the learning management system. **HQ** During new employee orientation and when training is requested. **ICE** Policies are disseminated during the bi-weekly new employee orientation, required training and on the ODCR intranet page. **TSA** HR Essentials Module on Reasonable Accommodation (RA) presented via Adobe Connect two times per year. RA information provided during new hire orientation every two weeks (26 times per year). RA awareness training provided to offices upon request. **USCG** Employees are informed about the reasonable accommodation program through

			Civil Rights awareness training multiple times a year.
			USCIS Provided during semi-annual supervisor trainings and employee overviews.
			USSS •Agency-wide training (three-hour training including DEIA and etiquette training) (Quarterly) •Anti-Harassment training (Monthly) •Cornerstone leadership training (Monthly) •Internal and external websites •New employee orientation •New supervisors training (Monthly) •Reasonable accommodation policy EES-06(05) •Uniform Division leadership training (Monthly) •Uniformed Division introductory training course and Special Agent introductory training course (twice per month)
A.2.c.4	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If "yes", please provide how often.	Yes	**CBP** At least annually with issuance of anti-discrimination and anti-harassment policy statement; and ongoing EEO training. **CISA** During Core Academy training and supervisory training. **FEMA** Provided on the intranet on an ongoing basis. **FLETC** During new employee orientation, FLETC new supervisor training, and posted on both internet and intranet. **HQ** During new employee orientation and when training is requested.

			ICE The anti-harassment policy is on the intranet site. ICE also provides AH policies and procedures biweekly during new employee orientation, required training in the learning management system, and during annual mandatory training for new managers and supervisors. **TSA** Provides annual mandatory Online Learning Center (OLC) training. Additionally, the Anti-Harassment Program (AHP) partners with the Civil Rights, Equity, Access, and Inclusion Division (CREAI) to provide virtual and onsite training to management teams upon request. **USCG** The anti-harassment program and updated policy and procedures are communicated to employees and supervisors through monthly Civil Rights Awareness Training, and by providing information through the CRD's monthly employee newsletter. **USCIS** Provided in the EEO policy statement and as a reminder in the newsletter. **USSS** •Anti-Harassment Training (Monthly) •Cornerstone leadership training (Monthly) •Internal website •New employee orientation •New supervisors training (Monthly) •RES-04 Prevention of Harassment in the Workplace •Uniform Division leadership training (Monthly)

			•Uniformed Division introductory training course and Special Agent introductory training course (twice per month)
A.2.c.5	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 29 C.F.R. § 2635.101(b)] If "yes", please provide how often.	Yes	**CBP** At least annually with issuance of anti-discrimination and anti-harassment policy statement; and ongoing EEO training. **CISA** During Core Academy Training and supervisory training. **FEMA** Provided on the intranet on an ongoing basis and provided annually during mandatory EEO employee course training and bi-weekly during employee/supervisor orientation. **FLETC** During new employee orientation, FLETC new supervisor training, and posted on both internet and intranet. **HQ** Anti-Harassment Program informs on all forms of harassment. Employee Relations handles all other inappropriate behavior within the agency, excluding EEO based complaints. **ICE** Covered in the Anti-Harassment Program Policy letter that is disseminated, publicized on ICE intranet website, and covered in the code of conduct and the ICE Table of Offenses and Penalties. **TSA** Management Directive (MD) 1100.73.3, "Anti-Harassment Program," was updated on November 25, 2021, and sent to all employees via a TSA broadcast message email. In addition, the Civil Rights, Equity, Access, and Inclusion Division provides new hire employee training every two weeks.

			USCG Employees are required to complete the Preventing and Addressing Workplace Harassment annually. The content includes information on behaviors that could result in disciplinary actions. **USCIS** Provided during the anti-harassment training required for all new hires, bi-annually for all employees and included in the EEO policy statement. **USSS** Information is continuously updated on the agency's website.
➡️ **Compliance Indicator** ⬇️ **Measures**	**A.3 – The agency assesses and ensures EEO principles are part of its culture.**	**Measure Met? (Yes/No/NA)**	**Comments**
A.3.a	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [See 29 29 C.F.R. § 1614.102(a) (9)] If "yes," provide one or two examples in the comments section.	Yes	**CBP** Commissioner's Workforce Engagement and Inclusion Award was awarded to 4 members of the Texas Office of Chief Counsel Engagement Team and five members of the San Diego Field Office Recruiting Team. **CISA** The "Champion of Equity, Diversity and Inclusion Award (Individual or Group)" award was added to CISA's recognition program. This award recognizes individuals or groups with up to 10 members who have excelled in efforts to promote equity, diversity, and inclusion at CISA through outstanding leadership and innovation.

			FEMA The 2022 Administrator's Awards were held on April 20, 2023. Two awards were given for diversity management and inclusion. **FLETC** Recognition on intranet and in staff meetings; management and staff are recognized through performance evaluations. **HQ** DHS Secretary has EEO-related categories in annual Secretary's Awards. **ICE** Director's Outstanding Achievement in Diversity Management and Core Value Awards. **TSA** The agency's Honorary Awards Program has an award category for Workforce Diversity and Inclusion. This award is granted by the Administrator to individual recipients. TSA also participates in the DHS Civil Rights and Civil Liberties (CRCL) Awards Program. **USCG** Federal Asian Pacific American Council (FAPAC) Military/Civilian Awards. National Association for the Advancement of Colored People (NAACP) Roy Wilkins Renown Service Award. **USCIS** Issues Director's Awards annually for Equal Employment Opportunity and Diversity Excellence. The award recognizes any USCIS employee, supervisor, manager, or team who has demonstrated superior commitment to further USCIS's goal to advance equality of employment opportunity, promoting a diverse workforce, and creating a workplace culture of inclusion.

			USSS The agency utilizes the Performance Appraisal process to provide Cash Awards, Time-off Awards, and Quality Step Increases to recognize the achievements and accomplishments of employees. Inculcated in the rating are employees support for EEO and Diversity principles.
A.3.b	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [See 5 29 C.F.R. Part 250]	Yes	

<table>
<tr><td colspan="4">Essential Element B: Integration of EEO into the Agency's Strategic Mission
This element requires that the agency's EEO programs are structured to maintain a workplace that is free from discrimination and support the agency's strategic mission.</td></tr>
<tr><td>→
Compliance Indicator
↓

Measures</td><td>B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.</td><td>Measure Met? (Yes/No/NA)</td><td>Comments</td></tr>
<tr><td>B.1.a</td><td>Is the agency head the immediate supervisor of the person ("EEO Director") who has day-to-day control over the EEO office? [See 29 C.F.R. §1614.102(b)(4)]</td><td>No
DHS, CBP, CISA, FEMA, FLETC, HQ, USCIS</td><td>FEMA The EEO Director has unfettered access to the FEMA Administrator. However, as with all FEMA front office executives, the EEO Director reports to the Chief of Staff for administrative purposes (such as approval of time and attendance/leave, travel authorizations, performance plans, etc.) Additionally, we note that FEMA's EEO Director is a member of the Principals Executive Panel, a small group of FEMA executives who establish FEMA priorities and allocate resources to fulfill those priorities.

ICE Yes. EEO Director reports to the Director of ICE.

TSA Yes. EEO Director reports to the TSA Administrator.

USCG Yes. EEO Director reports to the Agency Head.

USSS Yes. EEO Director reports to Director of the Secret Service.</td></tr>
<tr><td>B.1.a.1</td><td>If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If "yes," please provide the title of the agency head designee in the comments.</td><td>No
DHS, CBP, HQ</td><td>CBP The EEO Director reports to the Executive Director, Privacy and Diversity Office (PDO). The agency is reviewing this deficiency and decision is pending.

CISA The EEO Director reports to the Deputy Director who reports directly to the Agency Head.</td></tr>
</table>

			DHS The EEOD Director has regular and effective means of communicating and informing the agency head designee about the agency's EEO program to the Secretary. **FEMA** The EEO Director reports to the Chief of Staff. **FLETC** The EEO Director reports to the Chief of Staff of FLETC and has regular and effective means of communicating and informing the agency head designee about the agency's EEO program to the Director. **HQ** The EEO Director reports to the Deputy Officer of the Office for Civil Rights and Civil Liberties, who has the delegated EEO authority from the Secretary. **USCIS** The EEO Director reports to the USCIS Deputy Director.
B.1.a.2	Does the agency's organizational chart clearly define the reporting structure for the EEO office? [See 29 29 C.F.R. §1614.102(b)(4)]	Yes	
B.1.b	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency, and legal compliance of the agency's EEO program? [See 29 29 C.F.R. §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes	
B.1.c	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [See MD-715 Instructions, Sec. I)] If "yes," please provide the date of the briefing in the comments column.	No USCG	**DHS** Presented April 2023. **CBP** Presented 4/14/2023. **CISA** Presented November 14, 2023 (delayed from September due to pending shutdown). **FEMA** Presented 3/14/2023. **FLETC** Presented 1/27/2023.

			HQ Provided briefings to various HQ Programs, and to Deputy Officer for CRCL – various dates during FY 2023. **ICE** Presented 12/3/2022. **TSA** Presented 8/28/2023. **USCIS** Presented 06/27/2023. **USSS** Presented 10/16/2023.
B.1.d	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [See MD-715, II(B)]	No CBP	
➡️ **Compliance Indicator** ⬇️ **Measures**	**B.2 – The EEO Director controls all aspects of the EEO program.**	**Measure Met? (Yes/No/NA)**	**Comments**
B.2.a	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [See MD-110, Ch. 1(III)(A); 29 29 C.F.R. § 1614.102(c)]	Yes	
B.2.b	Is the EEO Director responsible for overseeing the completion of EEO counseling [See 29 29 C.F.R. § 1614.102(c)(4)]	Yes	
B.2.c	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [See 29 29 C.F.R. §1614.102(c)(5)] [This question may not be applicable for certain subordinate level Components.]	Yes	
B.2.d	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [See 29 29 C.F.R. §1614.102(c)(5)] [This question may not be applicable for certain subordinate level Components.]	Yes	Final Agency Decisions (FADs) are issued by DHS/CRCL for all Components.
B.2.e	Is the EEO Director responsible for ensuring compliance with EEOC orders? [See 29 C.F.R. § 1614.102(e); 1614.502]	Yes	

B.2.f	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [See 29 C.F.R. § 1614.102(c)(2)]	Yes	
B.2.g	If the agency has subordinate level Components, does the EEO Director provide effective guidance and coordination for the Components? [See 29 C.F.R. § 1614.102(c)(2) and (c)(3)]	Yes	
➡️ **Compliance Indicator** ⬇️ **Measures**	**B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.**	**Measure Met? (Yes/No/NA)**	**Comments**
B.3.a	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [See MD-715, II(B)]	No CBP	
B.3.b	Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [See MD-715, II(B)] If "yes," please identify the EEO principles in the strategic plan in the comments column.	No CBP	**CISA** Diversity & inclusion is referenced as one of CISA's core Principles, "Foster Belonging, Diversity, Inclusion, and Equality". Inclusion is emphasized as part of Goal 4 - Agency Unification). **FEMA** Identified in Goal 1 Instill Equity as a Foundation of Emergency Management Objective 1.1 Cultivate a FEMA That Prioritizes and Harnesses a Diverse Workforce https://www.fema.gov/about/strategic-plan **FLETC** Identified in: 3.1.2 Develop recruiting strategies that support FLETC's near- and long term-term staffing goals and 3.01.02.05 Foster a high performing, diverse, and inclusive workforce. **HQ** Referenced in the strategic plan's objective in developing and maintaining a high performing workforce:

		Promote a culture of transparency, fairness, and equal employment opportunity throughout the DHS workforce, providing avenues of redress and leadership support in addressing and resolving workplace conflict via integrated conflict management and Alternative Dispute Resolution systems. **ICE** Build a Culture of Inclusion, Transparency, and Trust; sub objective 1.1.3 Foster a Culture of Inclusion and Integrity. **TSA** The objective for "People & Culture" states: "Nurture our culture to encourage innovation and collaboration, and to learn from and celebrate our differences. Provide transparent communication of workforce culture attributes, activities, and improvements." The outcome for these objective states: "TSA is a workplace where every employee feels valued and can meet the mission to the best of their ability. TSA is flexible, fair, and provides equal employment opportunities to its workforce." **USCIS** Objective 1.1 of USCIS' strategic goal 1 is to recruit, develop, and retain a diverse, highly trained, and flexible workforce. **USCG** Ready Workforce 2030 Section III – USCG as a Choice Employer 2. Representative of the Nation We Serve. We must continue to press forward with efforts to analyze and remove barriers for recruitment, retention, and progression. Section VII – Mission Imperatives 3. Diversity and Inclusion Our future focus on recruiting and retaining a 2030 workforce will include systematically and intentionally

			integrating diversity and inclusion in our operating environments, processes, and talent management system. **USSS** Goal 2: Grow and Support a Diverse Workforce. Goal 3: Identify, Develop, and Empower Leaders. Goal 4: Modernize Business Processes. Goal 5: Increase Communication and Collaboration

Compliance Indicator Measures	B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.	Measure Met? (Yes/No/NA)	Comments
B.4.a	Pursuant to 29 C.F.R. § 1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:		
B.4.a.1	To conduct a self-assessment of the agency for possible program deficiencies? [See MD-715, II(D)]	Yes	
B.4.a.2	To enable the agency to conduct a thorough barrier analysis of its workforce? [See MD-715, II(B)]	No CISA	
B.4.a.3	To timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [See 29 C.F.R. § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	No CBP, ICE	
B.4.a.4	To provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [See MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	Yes	
B.4.a.5	To conduct thorough, accurate, and effective field audits of the EEO programs in Components and the field offices, if applicable? [See 29 C.F.R. § 1614.102(c)(2)]	Yes	
B.4.a.6	To publish and distribute EEO materials (e.g., harassment policies, EEO posters, reasonable accommodations procedures)? [See MD-715, II(B)]	Yes	

B.4.a.7	To maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [See MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	No USCG	**USCG** The Coast Guard does not collect and maintain complete applicant flow data.
B.4.a.8	To effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 U.S.C. § 7201; 38 U.S.C. § 4214; 5 C.F.R. § 720.204; 5 C.F.R. § 213.3102(t) and (u); 5 C.F.R. § 315.709]	Yes	
B.4.a.9	To effectively manage its anti-harassment program? [See MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	No CISA	
B.4.a.10	To effectively manage its reasonable accommodation program? [See 29 C.F.R. § 1614.203(d)(4)(ii)]	No CBP, FEMA	
B.4.a.11	To ensure timely and complete compliance with EEOC orders? [See MD-715, II(E)]	Yes	
B.4.b	Does the EEO office have a budget that is separate from other offices within the agency? [See 29 C.F.R. § 1614.102(a)(1)]	Yes	
B.4.c	Are the duties and responsibilities of EEO officials clearly defined? [See MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes	
B.4.d	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?	Yes	
B.4.e	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	Yes	
Compliance Indicator Measures	**B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.**	**Measure Met? (Yes/No/NA)**	**Comments**

B.5.a	Pursuant to 29 C.F.R. § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:		
B.5.a.1	EEO Complaint Process? [See MD-715(II)(B)]	Yes	
B.5.a.2	Reasonable Accommodation Procedures? [See 29 C.F.R. § 1614.102(d)(3)]	Yes	
B.5.a.3	Anti-Harassment Policy? [See MD-715(II)(B)]	No CISA	
B.5.a.4	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [See MD-715, II(B)]	Yes	
B.5.a.5	ADR, with emphasis on the Federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [See MD-715(II)(E)]	No CISA	
➡️ **Compliance Indicator** ⬇️ **Measures**	**B.6 – The agency involves managers in the implementation of its EEO program.**	**Measure Met? (Yes/No/NA)**	**Comments**
B.6.a	Are senior managers involved in the implementation of Special Emphasis Programs? [See MD-715 Instructions, Sec. I]	No HQ	
B.6.b	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	No HQ	
B.6.c	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [See MD-715 Instructions, Sec. I]	No HQ	
B.6.d	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 C.F.R. § 1614.102(a)(5)]	No HQ	

Essential Element C: Management and Program Accountability **This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency's EEO Program and Plan.**			
Compliance Indicator **Measures**	**C.1 – The agency conducts regular internal audits of its Component and field offices.**	**Measure Met? (Yes/No/NA)**	**Comments**
C.1.a	Does the agency regularly assess its Component and field offices for possible EEO program deficiencies? [See 29 C.F.R. § 1614.102(c)(2)] If "yes," please provide the schedule for conducting audits in the comments section.	No CBP, HQ	**DHS** The Department collected mid-year Part G updates from Components and conducts one-on-one reviews and meetings with Components to discuss program deficiencies. **CBP** EEO Office is not sufficiently staffed to perform this function. Resources have been requested and pending decision. **CISA** Weekly assessments are performed for EEO cases by divisions and MEOs. **FEMA** Does not have subordinate level components. **FLETC** Annually. **ICE** Annually. **TSA** Does not have subordinate level components and has no EEO functions in field offices. **USCG** Annually. All CG units are required to complete an EEO self-assessment of their commands by October 31. **USCIS** Does not have field offices. **USSS** The Agency assesses and enhances internal management accountability by conducting

			assessments of operations through an internal inspection process. The agency visually inspects field offices on a continuous basis to ensure in full compliance with Secret requirements.
C.1.b	Does the agency regularly assess its Component and field offices on their efforts to remove barriers from the workplace? [See 29 C.F.R. § 1614.102(c)(2)] If "yes," please provide the schedule for conducting audits in the comments section.	No CBP, CISA, HQ	**DHS** The Department annually conducts reviews of Component MD-715 reports including identification of triggers, identification of barriers, and action plans to remove identified barriers.

CISA Will establish quarterly meetings with divisions and components to discuss diversity breakdown, retention survey data issues and Trends in EEO complaints.

FEMA has no subordinate level components.

FLETC Annually.

ICE Annually.

TSA Does not have subordinate components and has no EEO functions in field offices.

USCG Command develops plans to address deficiencies, if any, following the assessment.

USCIS Does not have field offices.

USSS The Agency assesses and enhances internal management accountability by conducting assessments of operations through an internal inspection process which reviews management and operational processes. The agency visually inspects in full compliance with the Secret Service requirements. |
| **C.1.c** | Do the Component and field offices make reasonable efforts to comply with the recommendations of the field audit? [See MD-715, II(C)] | Yes | |

Compliance Indicator ⬅️ ⬇️ Measures	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (Yes/No/NA)	Comments
C.2.a	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [See MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	No CISA	**CISA** DHS HQ CRCL Anti-Harassment Unit has handled all CISA harassment complaints. OCSO will lead CISA's Anti-Harassment Program going forward.
C.2.a.1	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [See EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	No CISA	**CISA** DHS HQ CRCL Anti-Harassment Unit has handled all CISA harassment complaints. OCSO will lead CISA's Anti-Harassment Program going forward.
C.2.a.2	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [See EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006]	Yes	
C.2.a.3	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [See Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	
C.2.a.4	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [See Enforcement Guidance, V.C.]	No CISA, FEMA	**CISA** is under DHS HQ CRCL Anti-Harassment Program. CISA's Anti-harassment program will be managed by OCSO in coordination with OCHCO. Once CISA's policy and procedures are developed, OEDIA will begin to inform all counseling alleging harassment to OCSO.

FEMA The Office of Equal Rights created standard operating procedure and an intake form to notify OPR of all EEO counseling activity to where a harassment (sexual and non-sexual) allegation has been raised and will implement the SOP in FY 2024. |

C.2.a.5	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <u>Complainant v. Dept. of Veterans Affairs</u>, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dept. of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.	No CISA, FEMA, HQ, USCG	**CBP** 58.5 percent of inquiries were processed timely. **CISA** Handling of harassment complaints is in the process of being transitioned to CISA. **FEMA** The OPR investigators begin investigations/inquires within ten (10) days of notification to OPR. Currently, OPR does not receive harassment allegations that are initially raised as part of the EEO complaint process. **HQ** 0 percent compliance. **USCG** 66% of harassment complaints were processed timely.
C.2.a.6	Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [See 29 C.F.R. 1614.203(d)(2)]	Yes	
C.2.b	Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [See 29 C.F.R. 1614.203(d)(3)]	No USSS	
C.2.b.1	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [See 29 C.F.R. 1614.203(d)(3)(D)]	Yes	
C.2.b.2	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [See MD-110, Ch. 1(IV)(A)]	Yes	
C.2.b.3	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [See 29 C.F.R. 1614.203(d)(1)(ii)(B)]	Yes	
C.2.b.4	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [See 29 C.F.R. 1614.203(d)(3)(i)(M)]	Yes	
C.2.b.5	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [See MD-	No	**CBP** 19 percent of reasonable accommodation requests were timely processed.

	715, II(C)] If "no", please provide the percentage of timely-processed requests in the comments column.	CBP, FEMA, ICE, TSA, USCG, USSS	**FEMA** In FY 2023, 59 percent (885 out of 1,501) of reasonable accommodation requests were processed in 45 days, as specified in FEMA's updated reasonable accommodation procedures. **ICE** 42 percent of accommodation requests timely processed. **TSA** 74 percent of all reasonable accommodation request were timely processed. **USCG** 85 percent of reasonable accommodation requests were timely processed. The other requests were delayed due to searches for reassignments and/or the requestors' delay in submitting requested medical information. **USSS** 93.2 percent of reasonable accommodation requests for employees have been processed timely. (Average 12 days). 100 percent of reasonable accommodation requests for applicants have been processed timely.
C.2.c	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [See 29 C.F.R. 1614.203(d)(6)]	Yes	
C.2.c.1	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [See 29 C.F.R. § 1614.203(d)(5)(v)] If "yes," please provide the internet address in the comments column.	Yes	**DHS** https://www.dhs.gov/reasonable-accommodations-dhs **CBP** https://www.cbp.gov/about/eeo-diversity/reasonable-accommodation **CISA** Office of Equity, Diversity, Inclusion and Accessibility (OEDIA)	CISA **FEMA**

			Reasonable Accommodation	FEMA.gov
			FLETC Reasonable Accommodation Request Procedures | Federal Law Enforcement Training Centers (fletc.gov)
			HQ https://www.dhs.gov/reasonable-accommodations-dhs
			ICE https://www.ice.gov/doclib/about/offices/dcr/icePASP.pdf
			TSA https://www.tsa.gov/about/jobs-at-tsa
			USCG Frequently Asked Questions (uscg.mil) Request for Reasonable Accommodation, CG-6079
			USCIS Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities
			USSS https://www.secretservice.gov/diversity/overview

Compliance Indicator ⬇ Measures	C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	Measure Met? (Yes/No/NA)	Comments
C.3.a	Pursuant to 29 C.F.R. § 1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that	Yes	

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

Compliance Indicator ⟶ ⬇ Measures	C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.	Measure Met? (Yes/No/NA)	Comments
C.4.a	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [See 29 C.F.R. §1614.102(a)(2)]	Yes	
C.4.b	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [See MD-715 Instructions, Sec. I]	Yes	
C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [See 29 C.F.R. §1614.601(a)]	No USCG	**USCG** The Coast Guard does not collect and maintain complete applicant flow data.
C.4.d	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [See MD-715, II(C)]	Yes	
C.4.e	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:		
C.4.e.1	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 C.F.R. § 1614.203(d); MD-715, II(C)]	No HQ	
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [See MD-715, II(C)]	Yes	
C.4.e.3	Develop and/or provide training for managers and employees? [See MD-715, II(C)]	Yes	
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [See MD-715, II(C)]	No HQ	
C.4.e.5	Assist in preparing the MD-715 report? [See MD-715, II(C)]	Yes	

Compliance Indicator ⬇ Measures	C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.	Measure Met? (Yes/No/NA)	Comments
C.5.a	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [See 29 C.F.R. § 1614.102(a)(6); see also Douglas v. Veterans Administration, 5 MSPR 280 (1981)]	Yes	
C.5.b	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [See 29 C.F.R. § 1614.102(a)(6)] If "yes", please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Yes	**CBP** One individual received a letter of reprimand.

CISA There were no findings of discrimination that would necessitate managers being disciplined or sanctioned for discriminatory conduct in FY23.

FEMA In FY23, six individuals were disciplined/reprimanded.

FLETC In FY23, there were no findings of discriminatory conduct.

HQ Reports no findings of discriminatory conduct.

ICE No individuals needed discipline or sanction in FY23 based on findings of discrimination.

TSA Prepared fourteen (14) disciplinary actions for discriminatory conduct.

USCG There were no findings of discrimination that would necessitate individuals being disciplined or sanctioned.

USCIS No individuals were disciplined or sanctioned.

USSS Even when there are no findings of discrimination, and management officials have been |

			found to engage in inappropriate conduct, disciplinary actions are applied in accordance with ITG-04.
C.5.c	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [See MD-715, II(C)]	Yes	

Compliance Indicator ⬆ Measures	**C.6 – The EEO office advises managers/supervisors on EEO matters.**	**Measure Met? (Yes/No/NA)**	**Comments**
C.6.a	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [See MD-715 Instructions, Sec. I] If "yes," please identify the frequency of the EEO updates in the comments column.	Yes	**CBP** Memoranda and other information is issued semi-annually on EEO complaints, workforce demographics, legal updates, and special emphasis programs. **CISA** Workforce diversity data and special emphasis updates monthly; EEO complaints data updates weekly. **FEMA** Each OER unit provides senior leadership updates weekly through the OER weekly report, quarterly through the agency's 462 Report and annually through the MD-715 Report. **FLETC** Annually. **HQ** Provides semi-annual or annual briefings, training, and updates to key HQ program areas. Also provide as requested updates at Town Halls or special Supervisor or Manager meetings. **ICE** Annually. **TSA** The TSA Civil Rights, Equity, Access, and Inclusion Division provided reports to include workforce demographics and complaint data to all airports and Federal Air Marshal Service field offices

			visited and those offices that requested reports throughout the fiscal year. **USCG** Provided through triennial training, weekly meetings, No Fear act postings, and newsletters. **USCIS** Provided annually through the State of EEO briefing to leadership. Other information is provided to leadership on an ad hoc basis, including workforce demographics and other information regarding the status of barrier analyses efforts, findings of discrimination, and other relevant program aspects. **USSS** Annually.
C.6.b	Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [See MD-715 Instructions, Sec. I]	Yes	

Essential Element D: Proactive Prevention This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.			
→ **Compliance Indicator** **↓** **Measures**	**D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.**	**Measure Met? (Yes/No/NA)**	**Comments**
D.1.a	Does the agency have a process for identifying triggers in the workplace? [See MD-715 Instructions, Sec. I]	Yes	
D.1.b	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [See MD-715 Instructions, Sec. I]	Yes	
D.1.c	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities? [See 29 C.F.R. 1614.203(d)(1)(iii)(C)]	Yes	
→ **Compliance Indicator** **↓** **Measures**	**D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)**	**Measure Met? (Yes/No/NA)**	**Comments**
D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers? [See MD-715, (II)(B)]	Yes	
D.2.b	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [See 29 C.F.R. § 1614.102(a)(3)]	No HQ	
D.2.c	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource	No HQ	

	decisions, such as re-organizations and realignments? [See 29 C.F.R. § 1614.102(a)(3)]		
D.2.d	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [See MD-715 Instructions, Sec. I] If "yes," please identify the data sources in the comments column.	Yes	**CBP** Complaint data, exit surveys, program evaluations and special emphasis programs. **CISA** Complaint data, FEVS, exit surveys, and input from SEPMs and employee association groups. **FEMA** Complaint/grievance data, exit surveys, FEVS scores, affinity groups, the anti-harassment program, and special emphasis programs. **FLETC** I-Complaints, NFC, complaint, and grievance data, exit surveys, reasonable accommodation program, special emphasis programs. **HQ** Reviews include complaint data, AH data, SEP, RA, input from Employee Associations, FEV, Exit Data. **ICE** Exit survey data, complaint/grievance data; employee climate surveys; focus groups; site visits and evaluative data from the special emphasis programs. **TSA** Complaint/grievance data, employee climate survey, reasonable accommodation program, workforce demographics, and the Barrier Analysis Recommendation report. **USCG** Complaints/grievance, employee climate surveys, program evaluation (Command Checklist), anti-harassment program, reasonable accommodation program **USCIS** EEO complaint data, exit survey, FEVS scores, climate survey, special emphasis programs, reasonable accommodation program, and annual

			program assessment responses from program offices and directorates. **USSS** Complaints, exit survey, reasonable accommodation program, and anti-harassment program data.
➡️ **Compliance Indicator** ⬇️ **Measures**	**D.3 – The agency establishes appropriate action plans to remove identified barriers.**	**Measure Met? (Yes/No/NA)**	**Comments**
D.3.a	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [See 29 C.F.R. § 1614.102(a)(3)]	No CISA, HQ	
D.3.b	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [See MD-715, II(D)]	No HQ	
D.3.c	Does the agency periodically review the effectiveness of the plans? [See MD-715, II(D)]	No CISA, HQ	
➡️ **Compliance Indicator** ⬇️ **Measures**	**D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.**	**Measure Met? (Yes/No/NA)**	**Comments**
D.4.a	Does the agency post its affirmative action plan on its public website? [See 29 C.F.R. 1614.203(d)(4)] Please provide the internet address in the comments.	No CISA	**DHS** Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities | Homeland Security (dhs.gov) **CBP** https://www.cbp.gov/about/eeo-diversity/diversity-inclusion **FEMA**

			Office of Equal Rights | FEMA.gov **FLETC** Affirmative Action Plan | Federal Law Enforcement Training Centers (fletc.gov) **HQ** https://www.dhs.gov/sites/default/files/2023-07/dhs-fy-2022-affirmative-action-plan.pdf **ICE** https://www.ice.gov/leadership/dcr **TSA** https://www.tsa.gov/civil-rights-diversity-and-inclusion **USCG** https://www.uscg.mil/Resources/Civil-Rights/Reports-and-References/ **USCIS** Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities **USSS** https://www.secretservice.gov/diversity/overview
D.4.b	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [See 29 C.F.R. 1614.203(d)(1)(i)]	Yes	
D.4.c	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [See 29 C.F.R. 1614.203(d)(1)(ii)(A)]	No CISA	
D.4.d	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities	Yes	

	employed at the agency until it meets the goals? [See 29 C.F.R. 1614.203(d)(7)(ii)]		

Essential Element E: Efficiency This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency's EEO programs and an efficient and fair dispute resolution process.			
Compliance Indicator **Measures**	**E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.**	**Measure Met? (Yes/No/NA)**	**Comments**
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 C.F.R. § 1614.105?	Yes	
E.1.b	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 C.F.R. § 1614.105(b)(1)?	Yes	
E.1.c	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?	No FEMA	**FEMA** In FY 2023, 113 out of 183 (62%) acknowledgment letters were issued immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I).
E.1.d	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments.	No CBP, FEMA, ICE	**CBP** Average time 432 days. **CISA** Acceptance/Dismissal letters were timely issued by DHS HQ CRCL. **FEMA** In FY23, 136 out of 199 (68%) acceptance letters/dismissal decisions were issued within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I), a decrease from 85% in FY 2022. **FLETC** Average processing time was 15 days. **HQ** Average processing time is 59 days.

				ICE Average processing time was 79 days. **TSA** Average processing time was 24 days. **USCG** Average processing time was 35.7 days. **USCIS** Average processing time was 52 days. **USSS** Average processing time of issuing acceptance letters is 39 days.
E.1.e	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 C.F.R. § 1614.102(b)(6)?		Yes	
E.1.f	Does the agency timely complete investigations, pursuant to 29 C.F.R. § 1614.108?		No CBP, ICE	
E.1.g	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 C.F.R. § 1614.108(g)?		Yes	
E.1.h	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 C.F.R. § 1614.110(b)?		Yes	**DHS** Final agency decisions (FADs) are issued by DHS CRCL for all DHS Components.
E.1.i	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 C.F.R. § 1614.110(a)?		Yes	**DHS** Final actions are issued by DHS CRCL for all DHS Components.
E.1.j	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes," please describe how in the comments column.		Yes	**CBP** Feedback is provided during the annual review or completion of the contract. **CISA** HQ EEO staff is currently used but will hold contractors accountable for poor work product and/or delays. **FEMA** The agency's OER reviews investigators Reports of Investigations work upon submission for legal sufficiency and outlines any corrections that need to be made to the work product.

			FLETC EEO Complaints Manager, along with the Procurement Office, immediately contacts contract investigative company to address any deficiencies. **HQ** Contractors are held accountable in accordance with their statement of work. **ICE** ICE's Contracting Officer's Representative regularly meets with the contractor to discuss work quality and performance, and issues Letters of Concern to address noted deficiencies. **TSA** Contracts have a penalty clause for poor work quality and/or delays. **USCG** Performance issues with contract counselors/investigators are communicated to vendor and requests are made to remove contract personnel from working on EEO cases. **USCIS** The processing timeframes and sufficiency standards are included as part of the statement of work in the contract. If timelines and sufficiency standards are not met the issue is initially addressed with the contracting firm. Should the issue continue, the agency may exercise the provisions associated with breach of contract. **USSS** Works directly with Procurement Division to remove contractors who do not comply with the performance statement of work. Also, the Formal Complaints Program Manager monitors the work of contractors.
E.1.k	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes	

E.1.l	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 C.F.R. § 1614.403(g)]	Yes	
Compliance Indicator ⬇ **Measures**	**E.2 – The agency has a neutral EEO process.**	**Measure Met? (Yes/No/NA)**	**Comments**
E.2.a	Has the agency established a clear separation between its EEO complaint program and its defensive function? [See MD-110, Ch. 1(IV)(D)]	Yes	
E.2.b	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [See MD-110, Ch. 1(IV)(D)] If "yes," please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.	Yes	**DHS** CRCL has two embedded attorneys who have no role in the agency's defensive function. **CBP** The agency representative does not provide legal analyses during the processing of EEO complaints. The agency representative only conducts legal sufficiency reviews of settlement agreements. **CISA** CISA's OEDIA office has qualified staff members, attorneys, and those with a legal background to conduct the legal sufficiency reviews independent of the Office of Chief Counsel. **FEMA** There are attorneys in and assigned to the Office of Equal Rights. Attorneys assigned to or supporting the Office of Equal Rights are separate and apart from the agency's defensive function. FEMA Directive 112-5 also provides OCC as the Agency source of legal advice. **FLETC** EEO Complaints Manager. **HQ** Complaint Manager is an attorney, and the EEO Director is also an attorney. Also, the office was staffed with two legal advisors form the Office of

			General Council (OGC) who are available to assist with legal sufficiency reviews. **ICE** ODCR has two full-time embedded attorneys from the Office of Principal Legal Advisor that review reports of investigation. They provide legal advice to various divisions within ODCR and do not represent the Agency in any other manner. **TSA** Chief Counsel, Labor, and Employment Advice Section. **USCG** CRD has two Attorney Advisors within its division who conducts legal sufficiency reviews. **USCIS** EEO staff who conduct sufficiency reviews are attorneys and the EEO complaint manager who supervises these individuals is an attorney. **USSS** The attorney providing the legal sufficiency reviews is separate and distinct from other attorneys involved in the EEO Process.
E.2.c	If the EEO office relies on the agency's defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [See MD-110, Ch. 1(IV)(D)]	Yes	
E.2.d	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [See MD-110, Ch. 1(IV)(D)]	Yes	
E.2.e	If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [See EEOC Report, *Attaining a Model Agency Program: Efficiency* (Dec. 1, 2004)]	Yes	
Compliance Indicator Measures	**E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.**	**Measure Met? (Yes/No/NA)**	**Comments**

E.3.a	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [See 29 C.F.R. § 1614.102(b)(2)]	Yes	
E.3.b	Does the agency require managers and supervisors to participate in ADR once it has been offered? [See MD-715, II(A)(1)]	No FEMA	
E.3.c	Does the agency encourage all employees to use ADR, where ADR is appropriate? [See MD-110, Ch. 3(IV)(C)]	Yes	
E.3.d	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [See MD-110, Ch. 3(III)(A)(9)]	Yes	
E.3.e	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [See MD-110, Ch. 3(I)]	No CBP	
E.3.f	Does the agency annually evaluate the effectiveness of its ADR program? [See MD-110, Ch. 3(II)(D)]	Yes	
Compliance Indicator **Measures**	**E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.**	**Measure Met?** **(Yes/No/NA)**	**Comments**
E.4.a	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:		
E.4.a.1	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [See MD-715, II(E)]	Yes	
E.4.a.2	The race, national origin, sex, and disability status of agency employees? [See 29 C.F.R. § 1614.601(a)]	No DHS, USCIS	
E.4.a.3	Recruitment activities? [See MD-715, II(E)]	No CISA	
E.4.a.4	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [See MD-715, II(E)]	No CBP, USCG, USCIS	
E.4.a.5	The processing of requests for reasonable accommodation? [29 C.F.R. § 1614.203(d)(4)]	Yes	

E.4.a.6	The processing of complaints for the anti-harassment program? [See EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	No CISA	
E.4.b	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes	
Compliance Indicator **Measures**	**E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.**	**Measure Met? (Yes/No/NA)**	**Comments**
E.5.a	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [See MD-715, II(E)] If "yes", provide an example in the comments.	Yes	**DHS** Monitors complaint trends and quarterly diversity dashboards. **CBP** Conducts a trend analysis of EEO complaints as one of the regularly scheduled diversity reports (approximately every three years). **CISA** Complaint trends monitored through bi-weekly reports to leadership. **FEMA** The agency uses Tableau dashboards to track demographic participation and inclusion rate trends, special hiring authority trends, PWD and PWTDs participation and inclusion rates trends, and exit survey trends. **FLETC** Established baseline in FY 2021 with trend analysis worksheets, will continue to monitor trends annually. **HQ** Complaints program tracks trends for program offices (e.g., FPS, CISA, I&A) by issues and bases over several fiscal years and provides aggregate results to the programs offices. **ICE** The Office of Diversity and Civil Rights, Complaints and Resolution Division, provides

			monthly updates to ICE program office leadership regarding complaint activity and areas of concern identified in complaint data. Diversity data is provided to program offices annually.

TSA Program data is collected and reviewed on a weekly basis by the EEO Director or a designated representative. It includes complaint, ADR, and training/outreach data.

USCG 462 Report; MD-715 CG Civil Rights Strategic Plan 2020-2025

USCIS Each month USCIS monitored the EEO case processing times and trends and each quarter monitored permanent workforce demographic trends.

USSS Participates in a yearly assessment with DHS's Office for Civil Rights and Civil Liberties (CRCL) by producing a detailed, informational "QUAD Chart" that analyzes USSS's Strengths, Weaknesses, Opportunities and Threats (SWOT) as they relate to inclusive diversity. |
| **E.5.b** | Does the agency review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [See MD-715, II(E)] If "yes," provide an example in the comments. | No CISA | **DHS** Leads the DHS EEO Directors meeting, participates and contributes to the DHS Strategic Recruitment, Diversity, and Inclusion (SRDI) workgroup and the DHS ADR Council.

CBP Participates in the DHS EEO Director's meeting, DHS SRDI workgroup, and the ADR Council.

FEMA Routinely benchmarks with other agencies and attends compliance meetings held at DHS.

FLETC EEO staff participate in DHS Disability Employees Advisory Council; Quarterly DHS |

			Complaints Managers Group; DHS EEO Directors' Meeting; DHS SRDI workgroup; Monthly DHS ADR Council; Quarterly DHS Anti-Harassment Group and Quarterly DHS Component Meetings. **HQ** DHS has six component-wide working groups for this purpose. **ICE** Reviewed best practices across agencies to streamline processing of reasonable accommodation requests. Current reasonable accommodation procedures approved by EEOC July 13, 2022. **TSA** The EEO Director or a designated representative meets with other DHS EEO directors monthly to discuss best practices. **USCG** Annually, EEO personnel analyze the 462 performance elements against DHS components and the federal community. Staff uses this information to interact with those components who excel in some areas. **USCIS** Benchmarked other agencies' Special Emphasis Programs. **USSS** Hosts quarterly Disability Employment Advisory Council meetings where agencies share best practices of their Disability Programs.
E.5.c	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [See MD-715, II(E)]	No CISA	

Essential Element F: Responsiveness and Legal Compliance This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.			
Compliance Indicator **Measures**	**F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.**	**Measure Met? (Yes/No/NA)**	**Comments**
F.1.a	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [See 29 C.F.R. § 1614.102(e); MD-715, II(F)]	Yes	
F.1.b	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [See MD-715, II(F)]	Yes	
F.1.c	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [See MD-715, II(F)]	Yes	
F.1.d	Are procedures in place to process other forms of ordered relief promptly? [See MD-715, II(F)]	Yes	
F.1.e	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 9(IX)(H)]	Yes	
Compliance Indicator **Measures**	**F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.**	**Measure Met? (Yes/No/NA)**	**Comments**
F.2.a	Does the agency timely respond and fully comply with EEOC orders? [See 29 C.F.R. § 1614.502; MD-715, II(E)]	Yes	
F.2.a.1	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [See 29 C.F.R. § 1614.108(g)]	Yes	

F.2.a.2	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [See 29 C.F.R. § 1614.501]	Yes	
F.2.a.3	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [See 29 C.F.R. §1614.403(e)]	Yes	
F.2.a.4	Pursuant to 29 C.F.R. § 1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes	
Compliance Indicator **Measures**	**F.3 - The agency reports to EEOC its program efforts and accomplishments.**	**Measure Met? (Yes/No/NA)**	**Comments**
F.3.a	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), § 203(a)]	Yes	
F.3.b	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 C.F.R. § 1614.703(d)]	Yes	

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

H.1 listed below is new starting in the FY 2018 reporting cycle, which requires all Part G unmet measures to be represented in a Part H. Parts H.2 was closed out in prior years. H.3 was added back since temporary changes were made making DHS deficient in this area. H.4 and H.5 retain these numbers for continuity with prior year reports.

Part H.1

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

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

Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
DHS Component EEO program deficiencies	See Part G for list of DHS Components not meeting specific Part G measures. These include deficiencies in the anti-harassment program, barrier analysis, field audits, state of agency briefing, applicant flow data, disciplinary action recommendations, and EEO principles in strategic plans. See Part H for objectives, responsible officials, planned activities, and accomplishments related to each DHS Component deficiency.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/1/2017	At the Department level, monitor Component activities and progress in correcting EEO program deficiencies. Take actions, such as sharing best practices, to assist Components in addressing deficiencies.	9/30/2019	9/30/2024	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Deputy Officer & Director of Equal Employment Opportunity and Diversity, Office for Civil Rights & Civil Liberties (CRCL)	Veronica Venture	Yes
Director, Diversity Management Section (DMS), CRCL	Ambuja Bale	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
7/31/2019	Data call to all Components for mid-year update on all Part G measures and progress made on deficiencies	Yes	7/31/2023	7/21/2023
7/31/2019	CRCL/DMS staff meet one-on-one with each Component EEO staff and review program deficiencies, actions, accomplishments, and plans	Yes	7/31/2024	
12/1/2019	Data call to all Components for end-year Parts G, H and J, including progress made on deficiencies (Part H); Consolidate into Department Part G and compare to prior fiscal year Part G	Yes	12/1/2024	

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2023	Since these are ongoing annual activities, DHS updated the modified dates to 2024, except for the first activity, which is being discontinued. Review of Component program deficiencies occurs during the Component one-on-one visits (second activity) and the review of the data call input from components at the end of each fiscal year (third activity). The data call for the mid-year update on Part G measures and end of year for Parts G, H, and J was issued to all Components. The results were compiled by CRCL/DMS staff then shared with DHS Components.

	The overall compliance rate with the six essential elements for DHS increased from 93.9 percent in FY 2022 to 95.6 percent in FY 2023.
FY 2022	Since these are ongoing annual activities, DHS updated the Modified dates to 2023. The data call for the mid-year update on Part G measures and end of year for Parts G, H, and J was issued to all Components. The results were compiled by CRCL/DMS staff then shared with DHS Components. The overall compliance rate with the six essential elements for DHS decreased from 95.5 percent in FY 2021 to 93.9 percent in FY 2022. CISA, a recently created DHS Component, prepared their first MD-715 report for submission in FY 2022, and the EEO Office was established in Q4 of FY 2021. When CISA was excluded from the compliance rate comparison, compliance increased from 95.5 percent in FY 2021 to 95.9 percent in FY 2022.
FY 2021	Since these are ongoing annual activities, DHS updated the Modified dates to 2022. The data call for the mid-year update on Part G measures was issued to all Components. The results were compiled by CRCL/DMS staff then shared with DHS Components and conducted one-on-one meetings with each Component EEO official during which they reviewed program deficiencies, actions, accomplishments, and plans. The data call to all Components for end-year Parts G, H, and J was issued. The overall compliance rate with the six essential elements for DHS increased from 94.0 percent in FY 2020 to 95.5 percent in FY 2021.
FY 2020	Since these are ongoing annual activities, DHS updated the Modified dates to 2021 even though the three activities were completed for the FY 2020 reporting year. The data call to all Components for the mid-year update on Part G measures was issued on 5/12/2020 then compiled by CRCL/DMS staff. CRCL/DMS staff conducted one-on-one meetings with each Component EEO official during which they reviewed program deficiencies, actions, accomplishments, and plans. The data call to all Components for end-year Parts G, H, and J was issued. The Component Part G input was consolidated into this Department level MD-715 report (see Executive Summary).
FY 2019	Since these are ongoing annual activities, DHS updated the Modified dates to 2020 although all three activities were completed for the FY 2019 reporting year. Issued data call to all Components for mid-year update on all Part G measures; tabulated results; presented results to all Components at CRCL/DMS Component Quarterly Meeting then facilitated discussion of how to address common unmet measures. Conducted one-on-one meetings with Components to review program deficiencies, actions, accomplishments, and plans.

	Issued data call to all Components for end-year Parts G and H, including progress made on deficiencies (Part H); Consolidated into Department Part G and compared to prior fiscal year Part G.
FY 2018	Issued data call to all Components for mid-year update on all Part G measures; tabulated results; presented results to all Components at CRCL/DMS Component Quarterly Meeting then facilitated discussion of how to address common unmet measures.

Conducted one-on-one meetings with Components to review program deficiencies, actions, accomplishments, and plans.

Issued data call to all Components for end-year Parts G and H, including progress made on deficiencies (Part H); Consolidated into Department Part G and compared to prior fiscal year Part G. |

MD-715 – Part H.3
Agency EEO Plan to Attain the Essential Elements of a Model EEO Program

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

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

Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element E – Efficiency	E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program. E.4.a.2 - The race, national origin, sex, and disability status of agency employees? [See 29 C.F.R. § 1614.601(a)] Learning Management System (LMS) data with EEO demographic data elements is not available.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
3/30/2008	DHS is implementing a new Learning Management System (LMS) and the information technology team will work to link demographic data to the training data and make the data available to EEO for barrier analysis purposes.	3/30/2019	9/30/2024	

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
9/30/2019	1. Procure or develop and implement new LMS system at DHS.	Yes	9/30/2023	9/30/2023
9/30/2019	2. Link demographic data to LMS data and make data available in a secure form to the EEO office.	Yes	9/30/2024	

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2023	During FY 2023, DHS implemented a new learning management system (LMS). The IT staff who administrate the Tableau data system are working to link data from the new LMS to Tableau and ultimately allow EEO to link with demographic data. This work was ongoing in FY 2023.
FY 2022	During FY 2022, DHS decommissioned the Department's learning management system (referred to as the Performance and Learning Management System or PALMS) and is embarking on implementing a new learning management system. DHS has implemented a new enterprise data system (Tableau) and the data model for this system includes the capability to extract employee training data from talent management systems. DHS will continue to work on obtaining training data that can be broken down by ERI, gender, and disability as the new learning management system is deployed.
FY 2021	DHS is implementing a new enterprise data system (Tableau) and the data model for this system includes the capability to extract employee training data from the talent management system (referred to as the Performance and Learning Management System or PALMS) and merge the data with diversity data elements (ERI, gender, disability status). DHS will continue to work on obtaining training data that can be broken down by ERI, gender, and disability as the new system is deployed in FY 2022.
FY 2020	DHS achieved full operational capability for its talent management system (referred to as the Performance and Learning Management System or PALMS) for most Components. DHS will continue to identify qualifying career development programs and related courses, as well as produce a report in compliance with MD-715, using data from our talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes.
FY 2019	In FY 2019, DHS reported participation and applicant flow counts and percentages for the SES Career Development Program (CDP), which is the only program managed at the Department level that leads to promotion without further competition. The SES CDP, announced in USAJobs and USAStaffing, was used to track applications, qualifications, referrals, and selections. The Department was able to obtain full applicant flow data for

	the SES CDP announced in FY 2019. The SES CDP program staff were able to provide data on participants. DHS also reported applicant flow data for the Women in Law Enforcement pilot mentoring program. This program does not lead to promotion without further competition but is managed at the Department level. DHS achieved full operational capability for its talent management system (referred to as the Performance and Learning Management System, or PALMS) at six of the nine DHS Components in August 2017. OCHCO exempted FEMA, TSA, and USCG from adopting PALMS. In FY 2019, DHS planned to identify the solution set for follow-on capability, including reporting capability, such as that required for MD-715. DHS completed its collection of training course completion data from all Components in November 2019. In FY 2020, DHS will begin using this data with other data sets to determine our ability to produce the MD-715 report. DHS will continue to identify qualifying career development programs and courses that support those programs. Using data from our talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes, DHS will continue to produce a report in compliance with MD-715.
FY 2018	In FY 2018, DHS reported participation and applicant flow counts and percentages for the SES Career Development Program (CDP), which is the only program managed at the Department level that leads to promotion without further competition. The SES CDP, announced in USAJobs and USAStaffing, was used to track applications, qualifications, referrals, and selections. The Department was able to obtain full applicant flow data for the SES CDP announced in FY 2018. The SES CDP program staff were able to provide data on participants. DHS will identify qualifying career development programs at DHS and courses that support those programs. Using data from our talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes, DHS will produce a report in compliance with MD-715. DHS achieved full operational capability for its talent management system (referred to as the Performance and Learning Management System, or PALMS) at six of the nine DHS Components in August 2017. OCHCO exempted FEMA, TSA, and USCG from adopting PALMS. DHS plans to identify, in FY 2019, the solution set for follow-on capability, including reporting capability, such as that required for MD-715.

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

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

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

Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element E – Efficiency	E.1.h When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 C.F.R. § 1614.110(b)?

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
3/30/2008	Expand and clarify the data collection process to allow DHS to perform accurate, comprehensive, and timely analyses in the future.	3/30/2019	9/30/2023	9/30/2023
3/30/2008	Issue final agency decisions within 60 days.	3/30/2019	9/30/2023	9/30/2023

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
9/30/2019	1. Develop a multi-year plan to issue final agency decisions within 60 days in accordance with EEOC regulations.	Yes	9/30/2023	9/30/3023

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2023	In FY 2023, CMAS has achieved capacity and efficiencies to process all FADs timely. This Part H will be closed out.
FY 2022	Throughout FY 2022, CMAS provided Components an objective assessment (i.e., legal sufficiency, organization, documentation, etc.) of their EEO Reports of Investigation (ROI) through the ROI Feedback Tool which was initially launched in FY 2016. Additionally, CMAS continued to disseminate aggregate information on the quality of contractor-produced ROIs within the DHS EEO program to all Components. This aggregate information continues to provide Components with a snapshot of CMAS' assessments of the quality of ROIs issued by all contract firms and allows Components to make strategic decisions regarding their future ROI contractual needs. CMAS also provided the Components with monthly reports on cases coming due for action to ensure that CMAS received timely FAD requests. CMAS issued a total of 1,232 final merit-based actions, including 660 final agency decisions (FAD). Sixteen of these final actions were merit FAD findings, and seven implemented findings made by EEOC Administrative Judges. 68 percent of the final actions were timely issued, and 48 percent of the FADs were timely issued, a marked increase from FY 2021 when 19 percent of the FADs were timely issued. CMAS's FAD workload decreased in FY 2022, with 525 requests for FADs received in FY 2022, compared to the 567 requests received in FY 2021. CMAS also issued 129 procedural dismissal decisions and 22 settlement breach decisions.
FY 2021	During FY 2021, CMAS provided quarterly feedback to DHS Components on the quality of their Reports of Investigation (ROI) using an ROI Feedback Tool (Tool). Analysts assigned numerical ratings for several criteria related to legal sufficiency and readability and provided narrative information if needed to further explain numerical ratings. Component EEO Offices use the feedback as an additional method to assess the quality of their ROIs. The tool has proven to be an effective way for CMAS to partner with Components to improve the quality of ROIs across DHS. Since the Tool's inception, DHS Component Complaint Managers have welcomed the thorough feedback and detailed comments and offered their own suggestions for improvement. The Complaint Managers share the feedback with their staff members and contractors as an objective improvement mechanism.

	During FY 2021, CMAS issued or administratively closed over 1,300 final agency actions, including 1,145 merit final actions. DHS had an internal performance measure goal to issue 49 percent of merit final actions by their regulatory due date. Notably, 52 percent (591 of 1,145) of these merit-based final actions were timely issued. Accordingly, CMAS exceeded its timely issuance goal. With respect to merit FADs, CMAS continued to strategically address its backlog inventory. CMAS utilized its in-house adjudication resources primarily for FADs that could have been issued within regulatory timeframes. CMAS assigned many of the older cases to contract vendors to draft FADs. By fiscal year end, 369 cases were assigned to the contractor, and 327 drafts had been received. The contract resources were invaluable in helping address the backlog FAD inventory. As a result, the backlog inventory decreased from 407 at the end of FY 2020, to 178 at the end of the FY 2021. Addressing backlog inventory will continue as a focus in FY 2022.
FY 2020	During FY 2020, CMAS issued or administratively closed over 1,100 final agency actions in EEO complaints, including 893 merit final actions. DHS had an internal performance measure goal to issue 47 percent of merit final actions by their regulatory due date. Notably, 49 percent (437 of 893) of these merit-based final actions were timely issued. Accordingly, CMAS exceeded its timely issuance goal. With respect to merit FADs, CMAS continued to strategically address its inventory. CMAS utilized its in-house adjudication resources primarily for FADs that could have been issued within regulatory timeframes and assigned many of the older cases to a contract vendor to draft FADs. By fiscal year end, 229 cases were assigned to the contractor and 206 drafts had been received. This contract resource was invaluable in helping address the CMAS FAD inventory. Nonetheless, due to resource shortages within CMAS and continued increased incoming requests for final action, the backlog inventory grew from 311 at the end of FY 2019, to 407 at the end of the FY 2020. Addressing backlog inventory will continue as a focus in FY 2021.
FY 2019	For FY 2019, CRCL issued 954 final agency actions, including 832 decisions that addressed the merits of allegations of discrimination. Notably, 51 percent (421 of 832) of these merit-based final actions were timely issued; accordingly, CMAS surpassed its timely issuance goal by 6 percent. Additionally, CMAS continued to strategically address its backlog of merit-based cases pending final agency decision (FAD). CMAS utilized its in-house adjudication resources primarily for FADs that could be prepared within regulatory timeframes and assigned many of the older cases to a contract vendor to draft FADs. By fiscal year end, 178 cases had been assigned to the contractor and 184 drafts had been received (some having been sent to the contractor the prior fiscal year). This contract resource was invaluable in helping address the CMAS FAD backlog; nonetheless, due to resource shortages within CMAS and increased incoming requests for final action, the backlog grew from 172 at the beginning of FY 2019, to 311 at the end of the fiscal year. Backlog reduction will continue to be a focus in FY 2020.

MD-715 – Part H.5
Agency EEO Plan to Attain the Essential Elements of a Model EEO Program

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

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

Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.	B.4.a.3: To timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [See 29 C.F.R. § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
04/01/2020	Ensure sufficient budget and staffing to timely generate and issue final agency decisions in EEO complaints.	09/30/2021	09/30/2023	9/30/2023

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Officer for Civil Rights and Civil Liberties	Shoba Sivaprasad Wadhia	Yes
Deputy Officer & Director of Equal Employment Opportunity and Diversity, CRCL	Veronica Venture	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Conduct staffing study to identify staffing/budget shortages in the Complaints Management and Adjudication Section (CMAS), which is responsible for issuing all of DHS's final agency decisions.	Yes		9/30/2020
12/13/2020	Based on the staffing study, prepare, and submit justifications for staffing and related budget increases in CMAS.	Yes	3/31/2022	9/30/2022

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2023	CMAS was successful with the newly obtained resources to process all FADs timely in FY 2023. This Part H will be closed out.
FY 2022	CMAS was successful in obtaining additional staffing and budgetary resources. CMAS succeeded in essentially eliminating the case backlog by the end of FY 2022. DHS notes that while the rate of timeliness on merit FADs was 48 percent, this includes 175 FADs that were in backlog and could not be timely. With the backlog cleared, DHS anticipates having sufficient staff to meet timeliness goals in FY 2023.
FY 2021	CMAS submitted requests and justifications for additional staff and was successful in obtaining additional resources. CMAS hired a new CMAS Director, on-boarded one analyst, and hired two additional analysts (awaiting onboarding) in FY 2021. CMAS also obtained additional contract support that led to significant progress in reducing the case backlog from 407 at the beginning of FY 2021 to 178 at the end of FY 2021. DHS is not closing out this Part H at this time and will continue to pursue additional resources.
FY 2020	CRCL partnered with the Program Analysis and Evaluation Office, OCFO, and completed the CRCL staffing model. In addition to activities listed in this Part H, Component staffing models are also in progress. CRCL anticipates having the Component staffing models completed by 6/2021. CRCL will have an opportunity to request the additional staff indicated as needed by the staffing model by 3/2021.
FY 2019	CRCL formed a partnership with the Program Analysis and Evaluation Office, OCFO, and has initiated a staffing needs study across CRCL, which includes CMAS. The results of the staffing study are expected to be received by CRCL by the end of FY 2020.

Part I: Agency EEO Plan to Eliminate Identified Barrier

Part I.1 is new in FY 2023. The prior Part I.1 was closed in FY 2017. Part I.2, which addresses participation rates for IWD/IWTD, was closed per EEOC guidance that IWD/IWTD triggers and barriers are to only be addressed in Part J of MD-715 2.0. Part I.3 retains the I.3 identifier for consistency with prior year reporting.

Part I.1

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

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

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

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
DHS Component MD-715 Tables	Various	Triggers vary across the DHS Components. 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 I 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.

EEO Group(s) Affected by Trigger

EEO Group
All Men – See Component MD-715 Reports
All Women – See Component MD-715 Reports
Hispanic or Latino Males – See Component MD-715 Reports
Hispanic or Latina Females – See Component MD-715 Reports
White Males – See Component MD-715 Reports
White Females – See Component MD-715 Reports
Black or African American Males – See Component MD-715 Reports
Black or African American Females – See Component MD-715 Reports
Asian Males – See Component MD-715 Reports
Asian Females – See Component MD-715 Reports

EEO Group
Native Hawaiian or Other Pacific Islander Males – See Component MD-715 Reports
Native Hawaiian or Other Pacific Islander Females – See Component MD-715 Reports
American Indian or Alaska Native Males – See Component MD-715 Reports
American Indian or Alaska Native Females – See Component MD-715 Reports
Two or More Races Males – See Component MD-715 Reports
Two or More Races Females – See Component MD-715 Reports

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Department-level workforce analysis (see Executive Summary) and see Component MD-715 Reports
Complaint Data (Trends)	See Component MD-715 Reports	
Grievance Data (Trends)	See Component MD-715 Reports	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	See Component MD-715 Reports	
Climate Assessment Survey (e.g., FEVS)	See Component MD-715 Reports	
Exit Interview Data	See Component MD-715 Reports	
Focus Groups	See Component	

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
	MD-715 Reports	
Interviews	See Component MD-715 Reports	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	See Component MD-715 Reports	
Other (Please Describe)	See Component MD-715 Reports	

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
See Component MD-715 Reports	See Component MD-715 Reports

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
Policies, procedures, and practices that most directly impact 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 I to address the potential barrier.

Objective(s) and Dates for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Provide technical assistance through 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.	10/01/2023	9/30/2023	Yes	9/30/2024 (ongoing annually)	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Deputy CRCL Officer & Director of Equal Employment Opportunity and Diversity, (CRCL	Veronica Venture	Yes
Director, Diversity Management Section (DMS), CRCL	Ambuja Bale	Yes
Chief Human Capital Officer, OCHCO	Roland Edwards	Yes
DHS Components	Component EEO Directors (see Component reports for current EEO Directors)	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
9/30/2023	**Provide consultation and staff resources.** The Department EEO Office (CRCL, DMS) will consult with DHS Components on data analysis/trigger identification, barrier analysis, and provide Department-level staff to serve on Component EEO staff hiring panels, selection panels for barrier analysis contractors, and Component led barrier analysis teams.	9/30/2024 Updated Annually	

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
9/30/2023	**Technical Assistance Visits.** CRCL/DMS will review each DHS Component's prior year MD-715 report then meet with each Component. In the meetings, DHS Department staff review and identify opportunities and offer technical assistance to further barrier analysis efforts.	9/30/2024 Updated Annually	
10/31/2023	**DHS Barrier Analysis Performance Metric.** CRCL/DMS will coordinate with DHS Components to develop the annual DHS barrier analysis performance metric, *"Percent of planned activities furthering elimination of barriers to equal employment opportunity completed on time."* The performance metric identifies the percentage of barrier analysis activities planned for completion during the FY that were completed. In a 2019 report (GAO-19-573), the U.S. Government Accountability Office formally recommended that the Office of the Secretary develop performance measures for [the] Department's Equal Employment Opportunity (EEO) program, "including a mechanism for tracking progress toward eliminating barriers" to EEO. In response to GAO's recommendation, the Office for Civil Rights and Civil Liberties (CRCL) created this measure.	10/31/2024 Updated Annually	
11/30/2023	**Provide data and analytics.** CRCL/DMS will quarterly provide DHS Components with demographic data summaries; maintain online demographic dashboard that is populated with workforce data in real time. Annually provide all DHS Components with MD-715 data tables including applicant flow data; respond to ad-hoc requests from Components for data related to ongoing monitoring and barrier analysis efforts.	11/30/2024 Updated Annually	
9/30/2024	**Develop and provide barrier analysis tools for DHS Components.** CRCL/DMS will develop barrier analysis tools consistent with EEOC guidance to assist DHS Components with their barrier analysis efforts. Tools will be provided initially to 1-2 Components and assessed for effectiveness. The tools to be developed and provided to the DHS Components will consist of template surveys/questionnaires, focus group facilitation protocols (including root cause analysis), sample questions, and template barrier analysis reports. Tools may be refined based on feedback from the Components.		

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
9/30/2024	**Conduct MD-715/barrier analysis training.** CRCL/DMS will develop and deliver MD-715/barrier analysis training covering topics such as MD-715 reporting requirements, developing a barrier analysis plan, collecting supplemental/qualitative data using surveys, interpreting results to identify potential barriers and root causes.		

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2023	**Provide data and analytics.** CRCL staff provided quarterly demographic update reports and developed and provided all DHS Components with MD-715 data tables, including applicant flow data. In FY23, CRCL staff worked with the OCHCO Human Capital and Data Analytics group to develop and deploy an online, interactive diversity data dashboard that contains multiple filters and is available to all DHS Components for their use. The dashboard is updated with data each pay period and can show data for any pay period or set of pay periods over the past fiscal years.

Provide barrier analysis tools. In FY23, CRCL initiated an effort to develop a suite of barrier analysis tools including template surveys/questionnaires, focus group facilitation protocols (including root cause analysis), sample questions, and template barrier analysis reports. These tools were chosen for development based on feedback from DHS Components that Components needed assistance to move beyond workforce and archival (FEVS, complaints, exit survey) data when conducting a barrier analysis. CRCL plans to complete version 1 of the tools in FY24.

Conduct MD-715/barrier analysis training. In FY23, CRCL delivered training in data analytics to DHS Components at the Department-wide EEOD Conference. In late FY23, CRCL began developing barrier analysis training to deliver to Component staff tasked with conducting barrier analysis. The training will instruct Component staff how to use the barrier analysis tools to move beyond the existing data, collect qualitative information, and review results to identify potential barriers and root causes. CRCL plans to deliver the first training to DHS Components in FY24.

Provide Consultation and Staff Resources. In FY23, CRCL staff consulted with Components on providing updates on changes to data sources and MD-715 reporting, assistance in interpreting workforce and applicant flow data and conducting barrier analysis. CRCL staff aided in preparing and submitting Component annual MD-715 reports and served on the DHS Barrier Analysis Team. CRCL staff also served on selection panels for selecting barrier analysis contractors for USCG and CBP and an EEO Statistician for USCIS. |

	Technical Assistance Visits. In FY23, CRCL reviewed Component MD-715 reports and met with all 10 DHS Components from June – September 2023. During the meetings, CRCL advised Components on their barrier analysis action plans presented in their Component-specific Part I (and Part J) sections. The technical assistance visits are an annual practice to ensure that the planned activities to eliminate workforce barriers are being completed in a timely manner. **DHS Barrier Analysis Performance Metric.** CRCL collected information from the Components related to planned barrier analysis activities in their respective Parts I and J and reviewed Department-level activities planned and completed in FY22. In FY22, there were 149 action items planned for completion by DHS Components and at the Department level. Of these, 106, or 71.1%, were completed. This completion percentage is a 6% increase from the 67.0% completion percentage in the prior year (FY21).

Part I.3

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

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

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

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce data tables	Table A1	The non-retirement separation rate is high and disproportionately affects certain groups, most notably women. The high separation rate erodes efforts to create a workforce reflective of the Nation and to maintain target staffing levels. Statistical data on separation rates was reviewed and analyzed.

EEO Group(s) Affected by Trigger

EEO Group
All Men
All Women
Hispanic or Latino Males
Hispanic or Latina Females – Yes
White Males
White Females – Yes
Black or African American Males – Yes
Black or African American Females – Yes
Asian Males
Asian Females
Native Hawaiian or Other Pacific Islander Males – Yes
Native Hawaiian or Other Pacific Islander Females – Yes
American Indian or Alaska Native Males – Yes
American Indian or Alaska Native Females – Yes
Two or More Races Males

EEO Group
Two or More Races Females – Yes, trending down

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Table A1
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	FEVS multiple years
Exit Interview Data	Yes	DHS exit survey data
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	No	

Status of Barrier Analysis Process

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

Statement of Identified Barrier(s)

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

Description of Policy, Procedure, or Practice
and policies, procedures, and practices need to be examined at the Component level as it appears that the identified barrier is broad and inconsistent across the DHS Components.

Objective(s) and Dates for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Investigate and identify specific opportunities to improve supervision/management, advancement opportunities, organizational response to personal/family related reasons, work/life programs, and alternate work schedules any trends in resignations and reduce the overall rates by improving employee satisfaction.	10/01/2011	9/30/2019	Yes	9/30/2023	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Deputy Officer & Director of Equal Employment Opportunity and Diversity, CRCL	Veronica Venture	Yes
Director, Diversity Management Section (DMS), CRCL	Ambuja Bale	Yes
Chief Human Capital Officer, OCHCO	Roland Edwards	Yes
DHS Components	Component EEO Directors (see Component reports for current EEO Directors)	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
3/31/2011	1. Develop and Implement Exit Survey. (DHS Workforce Strategy Objectives 3.1 and 3.5: Use employee feedback to influence workplace policies and practices to improve employee satisfaction; Enhance employee recognition and work-life balance initiatives to improve employee satisfaction and retention.) 1.a. OCHCO will implement exit survey DHS-wide.		3/31/2011
6/30/2011	1.b. OCHCO will conduct preliminary review of results and continue in future years.		9/30/2012
12/30/2011	1.c. OCHCO will conduct first major review of results and continue in future years.		9/30/2012
3/31/2012	1.d. OCHCO will update or augment methods as needed and continue in future years.		3/31/2012
6/30/2012	1.e. OCHCO and CRCL will identify retention interventions and continue in future years.		6/30/2012
12/30/2012	1.f. OCHCO and CRCL will implement these interventions and continue in future years • Track interventions through this plan quarterly • Evaluate as yearly data become available • Make any needed corrections • Conduct-in-depth analysis every second year		12/30/2012
9/30/2013	2. Use Employee Viewpoint survey to identify changes needed to improve employee satisfaction. 2.a. Provide annual Federal Employee Viewpoint Survey (FEVS) results (and new yearly survey results as they become available) to DHS Components within two months of FEVS results publication annually.	9/30/2023	9/30/2023
9/30/2013	2.b. OCHCO, CRCL and Components will work jointly to develop DHS Component Employment Engagement Action Plans.	9/30/2023	9/30/2023
6/30/2011	3. Review promotion data.		6/30/2011

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
	3.a. CRCL will determine if there are areas or occupations with triggers in promotions annually.		
9/30/2011	3.b. CRCL will determine if these correlate with higher resignation rates annually.		9/30/2011
3/30/2013	3.c. If yes, CRCL will work with OCHCO to identify interventions • Track interventions through this plan • Evaluate as yearly data become available • Make any needed corrections		3/30/2013
9/30/2013	4. Annually, DHS Components will promote participation in their career development programs, academic programs, and learning training programs sponsored by their agency and/or government agencies. In addition, as appropriate, Components will have access to training/career development programs courses through: • Performance and Learning Management System (PALMS) • Online Courses • Online Books • (CBP) Leadership Institute • (USCIS) Training Academy • (ICE) Virtual University • (FEMA) Employment Development Division • (FLETC) Learning Management System • (TSA) Online Learning Center • DHS CRCL Institute • Naval Post Graduate School		9/30/2013
9/30/2013	5. Annually, DHS will continue to promote/advertise DHS-wide the Senior Executive Service Candidate Development and Fellows Program.		9/30/2013
9/30/2013	6. Annually, DHS Components will use their agency's Mentoring Program, if applicable, as another career development tool.		9/30/2013
3/31/2011	7. Annually, DHS Components will assess occupations and grade levels where there is substantial underrepresentation to identify skills, knowledge, and abilities by occupation; employees' training needs; and applicable career development programs.		3/31/2011

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2023	DHS is closing out this Part I. Review of exit survey and FEVS data across the Department is a recurring practice and all Components update their DHS Component Employment Engagement Action Plans. These practices are staffed and will continue. Components that have additional potential barriers have created their own Part I to identify and address the potential barriers. DHS added a new Part I this year that sets out the activities at the Department level that are done to facilitate and support Component-level barrier identification and elimination efforts. **Activity #1** The DHS Exit Survey is housed in the SurveyMonkey tool. Currently TSA, CBP, ICE, USSS, CISA, USCIS, and USCG all maintain their own exit surveys and the other DHS Components continue to administer the DHS Exit Survey. Datasets are combined to look at overall trends. Aside from retirement and end of temporary appointment, the top reasons separating non-SES employees listed for leaving DHS in FY23 were: • Supervisor/Management • Advancement Opportunities • Personal/Family Related OCHCO is working with all Components to improve survey participation and content. Effective FY22, all component POCs have been meeting quarterly via the Exit Survey Working Group to discuss challenges, updates, and share best practices. As a result of the Working Group's efforts, content/format changes were implemented FY24Q1 to modernize the DHS Exit Survey. **Activity#2** The 2023 FEVS results were provided to all DHS Components in October 2023. Overall DHS scores increased almost across the board, with the Employee Engagement Index up three percentage points to 67%. All Components have final signed 2023-2024 engagement action plans per guidance requirements, and OCHCO will meet with Component staff for mid-cycle updates in February/March 2024. **Activity #3** Part E covers the FY 2020 trigger analysis and information on Activity #3 b and c actions. **Activity #4** The Department continues to offer various ways for employees to further their education goals. In FY23, 17 employees were nominated to the Department of Defense Senior Service School master's degree programs, and 6 employees were nominated to attend the National Intelligence

	University in either 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: • DHS's Senior Executive Service Candidate Development Program (SES CDP) advertised both internally and externally to DHS; • DHS, in partnership with SkillSoft, offers nearly 40,000 online learning resources which can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are aligned to support competencies, job roles or blended learning offerings; and • The DHS Leader Development Program (LDP), which establishes required and optional development activities throughout the year for new and seasoned leaders at all levels across DHS. The LDP delivered: • 30 regularly scheduled courses to 813 participants. • 57 On-Demand courses to 3037 participants. • 22 courses for the Secretary's Honors Program Core Development Experience to 68 participants. 17 cohorts of the CISA Supervisor Series (4 courses each) to 322 participants. ### Activity #5 Advertising for the SES CDP occurs via email, the DHS website, and other avenues of communication. DHS will continue its outreach efforts to help ensure a diverse applicant pool for this program. DHS will also continue to advertise for the SES CDP through its Employee Associations as well as the Strategic Recruitment, Diversity, and Inclusion Council. ### Activity #6 In FY23, DHS HQ 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 125 mentee participants. Simultaneously, DHS HQ is researching a new mentoring platform to address IT security requirements that a prior vendor could not meet.
FY 2022	### Activity #1 Currently TSA, CBP, ICE, USSS, CISA, USCIS, and USCG all maintain their own exit surveys while the other DHS Components continue to administer the DHS Exit Survey. Datasets are combined to look at overall trends. Aside from retirement and end of temporary appointment, the top reasons that separating non-SES employees listed for leaving DHS in FY 2022 were: • Personal/Family-Related • Supervisor/Management • Advancement Opportunities

OCHCO is working with all Components to improve survey participation and content. Effective FY 2022, all Component POCs have been meeting quarterly via the Exit Survey Working Group to discuss challenges, updates, and share best practices.

Activity #2

The 2022 FEVS results were provided to all DHS Components in October 2022. Overall DHS scores decreased slightly, with the Employee Engagement Index down one percentage point to 64 percent. In July 2022, OCHCO met with Components for mid-cycle action plan reviews, and in October, OCHCO provided action plan training for the 2023-2024 cycle. New draft 2-year plans are due to OCHCO in February 2023, and final signed plans are due in August 2023. OCHCO also worked with the new DHS-wide Employee Engagement Steering Committee to formulate an overarching DHS engagement action plan, which was finalized in October 2022.

Activity #3

Part E covers the FY 2020 trigger analysis and information on Activity #3 b and c actions.

Activity #4

The Department continues to offer various ways for employees to further their education goals. In FY 2022, 28 employees participated in the Department of Defense Senior Service School master's degree program, and eight employees attended the National Intelligence University in either a bachelor's or master's degree program. DHS also nominated employees to attend the Center for Homeland Defense and Security Masters (19), Emergence (15), Pacific Executive Leaders Program (2), and Executive Leaders Program (12). DHS promotes the use of OPM's Federal Academic Alliance programs where employees can take advantage of various discounts from more than 15 different colleges/universities. DHS employees have, or will have, access to training/career development courses by means such as:

- DHS's Senior Executive Service Candidate Development Program (SES CDP) advertised both internally and externally to DHS;
- DHS, in partnership with SkillSoft, offers nearly 40,000 online learning resources which can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are aligned to support competencies, job roles or blended learning offerings; and
- The DHS Leader Development Program, which establishes required and optional development activities throughout the year for new and seasoned leaders at all levels across DHS.
- LDI delivered 25 tiered courses to 603 participants.
- LDI delivered 46 On-Demand courses to 1453 participants.

Activity #5

Advertising for the SES CDP occurs via email, the DHS website, and other avenues of communication. DHS will continue its outreach efforts to help ensure a diverse applicant pool for this program. DHS will also continue to advertise for the SES CDP through its Employee Associations as well as the Strategic Recruitment, Diversity and Inclusion Council.

	Activity #6 The DHS Mentoring Program is open to all DHS federal employees and was designed to build and retain a diverse, well-rounded cadre of employees. The program has helped participants develop numerous skills including managing change, communication, leadership, and time management. Mentees also learn more about DHS and how to effectively take on new challenges and responsibilities. Lastly, mentoring relationships benefit the mentee as well as the mentor and strengthens communications, trust, and collaboration across the DHS enterprise. The program is evaluated, and feedback is provided on its successes, along with areas requiring improvement. In FY 2022, the DHS Mentoring Program consisted of 404 mentors and 373 mentees with demographic information as follows: Gender Indicator (Mentors/Mentees) • Men = 430 (55.3%) • Women = 325 (41.8%) • Not identified = 22 (2.8%) Ethnicity/Race Indicators (Mentors/Mentees) • Hispanic or Latino = 91 (11.7%) • White = 446 (57.4%) • Black or African American = 147 (18.9%) • Asian = 57 (7.3%) • American Indian or Alaska Native = 7 (0.9%) • Two or More = 7 (0.9%) • Not identified = 22 (2.8%) Disability Indicators (Mentors/Mentees) • Do not self-identify as disabled = 669 (86.1%) • Self-identified as IWD = 73 (9.3%) • Self-identified as IWTD = 13 (1.6%) • Not identified = 22 (2.8%)
FY2021	**Activity #1** The DHS Exit Survey is in the SurveyMonkey tool. Currently TSA, CBP, ICE, USSS, CISA, and USCIS continue to maintain their own exit surveys, and the other DHS Components continue to administer the DHS Exit Survey. Datasets are combined to look at overall trends. Aside from retirement, the top reasons that separating non-SES employees listed for leaving DHS in FY 2021 were: • Supervisor/Management • Personal/Family-Related • End of Temporary Position/Internship OCHCO is working with all Components to improve survey participation and content. Effective FY 2022, all Component POCs will meet quarterly via the Exit Survey Working Group to discuss challenges, updates, and share best practices. **Activity #2** The 2020 FEVS results were provided to all DHS Components in January 2021. Overall DHS scores improved, with the Employee Engagement Index increasing three percentage points to 66 percent. In March 2021, OCHCO issued written guidance for the DHS Component employee

engagement action planning process that included mechanisms for OCHCO to monitor Component implementation of the OPM action planning cycle. OCHCO met with Component staff to discuss and assess the plans, and final signed plans are due by the end of November 2021.

Activity #3
Part E covers the FY 2020 trigger analysis and information on Activity #3 b and c actions.

Activity #4
The Department continues to offer various ways for employees to further their education goals. In FY 2021, 27 employees participated in the Department of Defense Senior Service School master's degree program. Eleven employees attended the National Intelligence University in either a bachelor's or master's degree program. DHS also nominates employees to attend the Center for Homeland Defense and Security Masters, Emergence, and Executive Leaders Programs. DHS promotes the use of OPM's Federal Academic Alliance programs where employees can take advantage of various discounts from more than 15 different colleges/universities.

DHS employees have, or will have, access to training/career development courses by means such as:
- DHS's Senior Executive Service Candidate Development Program (SES CDP) advertised both internally and externally to DHS;
- DHS, in partnership with SkillSoft, offers nearly 40,000 online learning resources which can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are aligned to support competencies, job roles or blended learning offerings; and
- The DHS Leader Development Program, which establishes required and optional development activities throughout the year for new and seasoned leaders at all levels across DHS.

Activity #5
Advertising for the SES CDP occurs via email, the DHS website, and other avenues of communication. DHS will continue its outreach efforts to help ensure a diverse applicant pool for this program. In addition, DHS is developing an SES Outreach Plan that will outline strategies to increase diversity in the SES cadre. In FY 2021 and beyond, DHS advertised and will continue to advertise for the SES CDP through its Employee Associations as well as the Strategic Recruitment, Diversity and Inclusion Council.

Activity #6
The DHS Mentoring Program is a formal program that provides enriching experiences through reciprocal relationships and opportunities for personal and professional growth while sharing knowledge, leveraging skills, and cultivating talent. The DHS Mentoring Program is open to all DHS federal employees. The Under Secretary for Management announces the launch of this flagship mentoring opportunity, and training is provided to mentors. Types of mentoring include Speed Mentoring, Flash Mentoring, Situational Mentoring, Reverse Mentoring, Group Mentoring, and Peer Mentoring. The program is evaluated, and feedback is provided on its successes, along with areas requiring improvement.

In FY 2021, the DHS Mentoring Program consisted of 388 mentors and mentees providing demographic information as follows:

Gender Indicator (Mentors/Mentees)
- Men = 408 (52.8%)
- Women = 343 (44.4%)
- Not identified = 21 (2.7%)

Ethnicity/Race Indicators (Mentors/Mentees)
- Hispanic or Latino = 98 (12.6%)
- White = 441 (57.1%)
- Black or African American = 140 (18.1%)
- Asian = 56 (7.2%)
- Native Hawaiian or Other Pacific Islander = 3 (0.3%)
- American Indian or Alaska Native = 10 (1.2%)
- Two or More = 3 (0.3%)
- Not identified = 22 (2.7%)

Disability Indicators (Mentors/Mentees)
- Do not self-identify as having a disability = 665 (86.1%)
- Self-identified as IWD = 66 (8.5%)
- Self-identified as IWTD = 20 (2.5%)
- Not identified = 21 (2.7%)

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

To capture agencies' affirmative action plans for persons with disabilities (PWD[10]) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and EEOC MD-715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

Section I: Efforts to Reach Regulatory Goals

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

1. Using the goal of 12 percent as the benchmark, does your agency have a trigger involving <u>PWD</u> by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.
   - a. Cluster GS-1 to GS-10 (PWD)   Yes X   No
   - b. Cluster GS-11 to SES (PWD)   Yes   No X

> 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.

2. Using the goal of 2 percent as the benchmark, does your agency have a trigger involving <u>PWTD</u> by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.
   - a. Cluster GS-1 to GS-10 (PWTD)   Yes X   No
   - b. Cluster GS-11 to SES (PWTD)   Yes X   No

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

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.

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 programs; and oversee any other disability hiring and advancement program the agency has in place.

PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

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

                              Yes X   No

CRCL's Equal Employment Opportunity and Diversity Division has a full-time Departmental Disability Employment Program Manager who is responsible for implementing and maturing the DHS Disability Employment Program. Additionally, at the Department level, OCHCO's Strategic 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.

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing job applications from PWD and PWTD.	22	81	30	Laura Davis, Disability Employment Program Manager, CRCL
Answering questions from the public about hiring authorities that take disability into account	86	81	52	Laura Davis, Disability Employment Program Manager, CRCL
Processing reasonable accommodation requests from applicants and employees	35	4	76	Laura Davis, Disability Employment Program Manager, CRCL; OCHCO – Department-wide Reassignment as a Reasonable Accommodation of Last Resort (rraolrrequest@hq.dhs.gov) Darlene Avery for HQ requests; all other Component POCs are identified in their Component-level report.
Section 508 Compliance	26	3	4.5	Nicshan Floyd, Executive Director, Accessibility and Usability, Office of the Chief Information Officer
Architectural Barriers Act Compliance	8	17	2C3	William Bush, Executive Director, Facilities and Operational Support, MGMT/FOS

Special Emphasis Program for PWD and PWTD	15	1	123	Laura Davis, Disability Employment Program Manager, CRCL

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

Yes X   No

DHS CRCL/EEOD provided continuous training and guidance to all responsible staff to ensure they have the most up-to-date information and resources to 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.

PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Yes **X**   **No**

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: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

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:
  - 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).
  - 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))
  - 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.

Yes **X**   No   N/A

> DHS developed training for all hiring managers and human resources professionals entitled, "*Employment of People with Disabilities: A Roadmap to Success*." The training includes information on Schedule A hiring authority 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 listserv containing more than 550 organizations to conduct targeted recruiting by promoting participation in various recruitment activities and in Department-hosted webinars. The listserv 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 percent for PWD and 2 percent for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If "yes", please describe the triggers below.

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

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

During FY 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.

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

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

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

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.

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified *internal* applicants for any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below.
   a. Qualified Applicants for MCO (PWD)   Yes   No   N/A **X**
   b. Qualified Applicants for MCO (PWTD)   Yes   No   N/A **X**

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

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below.
   a. Promotions for MCO (PWD)   Yes   No **X**
   b. Promotions for MCO (PWTD)   Yes   No **X**

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 IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities

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

A. ADVANCEMENT PROGRAM PLAN

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

All 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 OPPORTUNITIES

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 HQ 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 self-identifying 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.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs (Pathways Intern)		272		16.1%		3.3%
Fellowship Programs (Pathways Recent Graduates)		127		24.4%		4.7%
Presidential Management Fellows		16		25.0%		0.00
Mentoring Programs (*DHS HQ Speed Mentoring Program)*		289		12.5%		2.4%
Coaching Programs						
Training Programs						
Detail Programs						
Other Career Development Programs DHS SES CDP	539	56	3.90%	0.00%	1.67%	0.00

3. Do triggers exist for <u>PWD</u> among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.
    a. Applicants (PWD)   Yes **X**   No   N/A
    b. Selections (PWD)   Yes **X**   No
                N/A

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 <u>PWTDs</u> among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.
    a. Applicants   (PWTD)   Yes **X**   No   N/A
    b. Selections   (PWTD)   Yes **X**   No   N/A

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 (PWDs)   Yes **X**   No

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

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%

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWDs and/or PWTDs for quality step increases or performance-based pay increases? If "yes", please describe the trigger(s) in the text box.
   a.   Pay Increases (PWDs)   Yes **X**   No
   b.   Pay Increases (PWTDs)   Yes **X**   No

Based on a review of MD-715 Table B9-1: Employee Recognition and Awards - Distribution by Disability, PWDs 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%

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3. If the agency has other types of employee recognition programs, are PWDs and/or PWTDs recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If "yes", describe the employee recognition program and relevant data in the text box.
   a. Other Types of Recognition (PWDs)   Yes   No   N/A **X**
   b. Other Types of Recognition (PWTDs)   Yes   No   N/A **X**

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

D. PROMOTIONS

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

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

     ii. Internal Selections (PWDs)   Yes   No **X**

   b. Grade GS-15

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

     ii. Internal Selections (PWDs)   Yes   No **X**

   c. Grade GS-14

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

ii. Internal Selections (PWDs)   Yes   No **X**

  d. Grade GS-13

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

    ii. Internal Selections (PWDs)   Yes   No **X**

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

	Qualified Internal Applicants by Senior Grade:	Relevant Applicant Pool by Senior Grade:
SES:	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.

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

    a. SES

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

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

    b. Grade GS-15

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

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

  c. Grade GS-14

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

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

  d. Grade GS-13

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

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

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 PWDs among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

    a. New Hires to SES   (PWDs)   Yes   No **X**

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

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

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

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 <u>PWTD</u> among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

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

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

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

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

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.

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

a. Executives

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

    ii. Internal Selections (PWDs)   Yes   No **X**

b. Managers

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

    ii. Internal Selections (PWDs)   Yes   No **X**

c. Supervisors

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

    ii. Internal Selections (PWDs)   Yes   No **X**

Relevant applicant pool data is not available. Internal announcements often have an area of consideration that is broader than the announcing agency. 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.

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

a. Executives

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

    ii. Internal Selections (PWTDs)   Yes   No **X**

b. Managers

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

    ii. Internal Selections (PWTDs)   Yes   No **X**

c. Supervisors

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

    ii. Internal Selections (PWTDs)   Yes   No **X**

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

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.

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

a. New Hires for Executives (PWDs)   Yes   No **X**

b. New Hires for Managers (PWDs)   Yes   No **X**

c. New Hires for Supervisors (PWDs)   Yes   No **X**

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.

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

      a. New Hires for Executives (PWTDs)   Yes   No **X**

      b. New Hires for Managers (PWTDs)   Yes   No **X**

      c. New Hires for Supervisors (PWTDs)   Yes   No **X**

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 V: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

<div align="center">Yes _____   No X</div>

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 PWDs among voluntary and involuntary separations exceed that of persons without disabilities? If "yes", describe the trigger below.

   a. Voluntary Separations (PWDs)   Yes **X**   No
   b. Involuntary Separations (PWDs)   Yes **X**   No

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: 2.82%
PWODs 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.

3. Using the inclusion rate as the benchmark, did the percentage of <u>PWTDs</u> among voluntary and involuntary separations exceed that of persons without targeted disabilities? If "yes", describe the trigger below.
   a. Voluntary Separations (PWTDs)   Yes **X**   No
   b. Involuntary Separations (PWTDs)   Yes **X**   No

Based on a review of MD-715 Table B14: Separations by Type of Separation - Distribution by Disability, 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.

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

During FY 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 Component-level 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. The following chart provides a four-year trend analysis.

	Disability Program Questions	All Respondents			
		FY 2020 *311 Respondents*	**FY 2021** *840 Respondents*	**FY 2022** *1115 Respondents*	**FY 2023** *792 Respondents*
1	**DHS took appropriate steps to ensure accessibility (technology and facility) requirements were met for qualified individuals of disabilities.**	Agree 18.97	Agree 16.50%	Agree 16.50%	Agree 17.55%
		Strongly Agree 16.40	Strongly Agree 12.65%	Strongly Agree 12.65%	Strongly Agree 12.50%
		Neither Agree nor Disagree 10.93%	Neither Agree nor Disagree 10.04%	Neither Agree nor Disagree 10.04%	Neither Agree nor Disagree 8.46%
2	**DHS took appropriate steps to ensure reasonable accommodation and/or Personal Assistance Services were provided to qualified individuals with disabilities.**	Agree 16.72%	Agree 15.16%	Agree 15.16%	Agree 15.66%
		Strongly Agree 15.76%	Strongly Agree 11.75%	Strongly Agree 11.75%	Strongly Agree 10.48%
		Neither Agree nor Disagree 11.58%	Neither Agree nor Disagree 9.96%	Neither Agree nor Disagree 9.96%	Neither Agree nor Disagree 9.34%
3	**DHS proactively supported efforts to improve the RECRUITMENT of individuals with disabilities.**	Neither Agree nor Disagree 22.54%	Neither Agree nor Disagree 13.36%	Neither Agree nor Disagree 13.36%	Neither Agree nor Disagree 14.02%
		Agree 11.58%	Agree 10.67%	Agree 10.67%	Agree 9.97%
		Strongly Agree 9.00%	Strongly Agree 7.53%	Strongly Agree 7.53%	Strongly Agree 6.82%
4	**DHS proactively supported efforts to improve the HIRING of individuals with disabilities.**	Neither Agree nor Disagree 18.33%	Neither Agree nor Disagree 13.09%%	Neither Agree nor Disagree 13.09%%	Neither Agree nor Disagree 13.26%
		Agree 9.97%	Agree 11.12%	Agree 11.12%	Agree 9.72%
		Strongly Agree 9.0%	Strongly Agree 6.91%	Strongly Agree 6.91%	Strongly Agree 6.44%
5	**DHS proactively supported efforts to improve the ADVANCEMENT of individuals with disabilities.**	Neither Agree nor Disagree 18.65%	Neither Agree nor Disagree 14.08%	Neither Agree nor Disagree 14.08%	Neither Agree nor Disagree 14.52%
		Strongly Agree and Agree (same rate) 8.36%	Agree 9.15%	Agree 9.15%	Agree 7.95%
		Strongly Disagree 4.18%	Strongly Agree 6.91%	Strongly Agree 6.91%	Strongly Agree 66.31%
6	**DHS proactively supported efforts to improve the RETENTION of individuals with disabilities.**	Neither Agree nor Disagree 18.65%	Neither Agree nor Disagree 14.35%	Neither Agree nor Disagree 14.35%	Neither Agree nor Disagree 14.39%
		Strongly Agree 8.36%	Agree 9.42%	Agree 9.42%	Agree 5.30%
		Agree 7.07%	Strongly Agree 5.65%	Strongly Agree 5.65%	Strongly Agree 5.30%

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 C.F.R. § 1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794 (b)) concerning the accessibility of agency technology and under the

Architectural Barriers Act of 1968 (42 U.S.C. § 4151- 4157) concerning the accessibility of agency facilities, along with instructions on how to file complaints alleging violations of these accessibility requirements In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

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

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

Specifically, the website provides:

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.

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

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

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)
    - Total Requests, Total Closed, Total Pending, Total Costs
- Reasonable Accommodation Processing Timeframes
    - 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
    - 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
    - Date Submitted to EEOC (raprocedures@eeoc.gov), Date Received EEOC Approval
- Procedures Posted to Internal and External Website
    - 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, 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 C.F.R. § 1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide PAS to employees in 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 VI: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWDs file a formal EEO complaint alleging harassment, as compared to the government-wide average?
   Yes   No   **X**   N/A
2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?
   Yes **X**   No   N/A
3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

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

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

   Yes   No **X**   N/A

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

   Yes **X**   No   N/A

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

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 VII: Identification and Removal of Barriers

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

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

    Yes **X**   No

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

    Yes **X**   No   N/A

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

    See following plans for Triggers 1 through 4:

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.
Barrier(s)	Not Identified
Objective(s)	Increase workforce participation rates of PWDs and PWTDs at all grade levels.

Responsible Official(s)	**Performance Standards Address the Plan? (Yes or No)**
Laura Davis, CRCL Ginny Berry, OCHCO Nicshan Floyd, A&U	Yes Yes N/A

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

Sources of Data	**Sources Reviewed? (Yes or No)**	**Identify Information Collected**
Workforce Data Tables	**Yes**	FY 2023 Update: B1 – Total Permanent Workforce DHS experienced an increase of 2,113 employees from FY 2022 to FY 2023 for PWDs, representing a total of 30,871 employees and 15.40 percent of the permanent workforce, with a total ratio increase of 0.67 percent. PWTDs experienced an increase of 141 employees, representing 2,614 employees and 1.30 percent of the permanent workforce, with a ratio increase of 0.04 percent. While employees without disabilities experience a ratio change of -1.10 percent. DHS New Hires for PWDs represented 16.27 percent, exceeding the goal of 12 percent, and PWTDs represented 1.61 percent, below the two percent goal. DHS experienced increases in Separation rates compared to FY 2022 for both PWDs and PWTDs. PWDs separated at a rate of 17.80 percent, compared to 15.71 percent in FY 2022, and PWTDs separated at 1.70 percent, compared to 1.49 percent in FY 2021. --- FY 2022 Update: B1 – Total Permanent Workforce DHS experienced an increase of 959 employees from FY 2021 to FY 2022 for

		PWDs, representing a total of 28,669 employees and 14.75 percent of the permanent workforce, with a total ratio increase of 0.39 percent, equal to employees without disabilities. PWTDs experienced an increase of 42 employees, representing 2,460 employees and 1.27 percent of the permanent workforce, with a ratio increase of 0.01 percent.

DHS New Hires for PWDs represented 14.99 percent, exceeding the goal of 12 percent, and PWTDs represented 1.37 percent, below the two percent goal.

DHS experienced decreases in Separation rates compared to FY 2021 for both PWDs and PWTDs. PWDs separated at a rate of 15.71 percent, compared to 16.93 percent in FY 2021, and PWTDs separated at 1.49 percent, compared to 1.78 percent in FY 2021.

Prior year summary analysis can be found in prior year reports… |
| Complaint Data (Trends) | Yes | FY 2023 Update
462 – (Part IV) Bases and Issues Alleged in Complaints Filed: DHS experienced an increase from 113 in FY 2022 to 134/1263 in FY 2023 (11 percent) in total number of complaints alleging failure to accommodate.

DHS experienced a slight decrease from 202 in FY 2022 to 197/1263 in FY 2023 (16 percent) in the total number of complaints alleging harassment based on disability.

No FEAR Act 4th Quarter
Complaints alleging discrimination based on disability has continued to increase in the last eight years (FY 2014 – FY 2022) from 13.60 percent of all complaints to 16.53 percent of all complaints in FY 2023. Discrimination based on Disability was alleged 492/2976 of all complaints by basis, which is a 2.76 percent decrease compared to the prior year when |

| | | | discrimination based on disability was raised in 517/1637 complaints by basis.

Considering complaints by issue, complaints based on "reasonable accommodation" ranked sixth out of twenty-four issues during FY 2023, compared to seventh in FY 2022, and complaints by issue "medical examination," dropped significantly, from 199 in FY 2022 to 38 in FY 2023, moving to the fourteenth most common issue raised.

FY 2022 Update
462 – (Part IV) Bases and Issues Alleged in Complaints Filed: DHS experienced an increase from 84 in FY 2021 to 113 in FY 2022 (34.52 percent) in total number of complaints alleging failure to accommodate.

DHS also experienced an increase from 159 in FY 2021 to 202 in FY 2022 (27.04 percent) in the total number of complaints alleging harassment based on disability.

Complaints alleging discrimination based on disability has continued to increase in the last eight years (FY 2014 – FY 2022) from 13.60 percent of all complaints to 30.91 percent of all complaints in FY 2022. Disability discrimination was alleged in 506 complaints, which is a 52.8 percent increase over the prior year when discrimination based on disability was raised in 331 complaints.

Considering complaints by issue, complaints based on "reasonable accommodation" ranked seventh out of twenty-four issues during FY 2022, compared to sixth in FY 2021, and complaints by issue "medical examination," rose significantly, from 15 in FY 2021 to 199 in FY 2022, moving to the fifth most common issue raised. |

		------------- Prior year summary analysis can be found in prior year reports…
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	**FY 2023 462 Report Update** – DHS had a decrease in the total number of settlements based on disability harassment, from 52 in FY 2022 to 49 in FY 2023. There was an increase in the number of settlements based on failure to accommodate, from 37 in FY 2022 to 45 in FY 2023. During FY 2023, DHS had four findings based on disability harassment and two findings based on failure to accommodate. This was an increase in the total number of findings, from five in FY 2022 to six in FY 2023. DHS continues to remain under the government-wide average for both types of complaints filed by PWDs for the fourth year in a row. ---------- **FY 2022 462 Report Update** – DHS had an increase in the total number of settlements based on disability harassment, from 47 in FY 2021 to 52 in FY 2022. There was a slight decrease in the number of settlements based on failure to accommodate, with 39 in FY 2021 and 37 in FY 2022. During FY 2022, DHS had four findings based on disability harassment and one finding based on failure to accommodate. This was an increase in the total number of findings, from 2 in FY 2021 to five in FY 2022. DHS continues to remain under the government-wide average for both types of complaints filed by PWDs for the third year in a row. --------------- **Prior year summary analysis can be found in prior year reports…**
Climate Assessment	No	

Survey (e.g., FEVS)		
Exit Interview Data	Yes	**FY 2023 Update – DHS Exit Survey** The DHS Exit Survey results exclude USCIS, USSS, and ICE. Component-specific data can be gleaned from Component reports. Excluding four categories "Blank, Other, Retirement, and Temporary Appointment", the top three categories cited for separating PWDs as the primary reason for leaving were: (1) Supervisor/Management (22.6 percent); (2) Advancement Opportunities (16.1 percent), and (3) Personal/Family Related (11.3 percent); The top three categories cited for separating PWTDs included: (1) Advancement Opportunities (20 percent); (2) Personal/Family Related (16 percent); and (3) Supervisor/Management (12 percent). FY 2022 Exit Survey results continued to include data on the six established disability program questions from hiring and recruitment to accommodations and accessibility. Details are provided in Section V: Plan to Improve Retention of Persons with Disabilities. ----------- **FY 2022 Update – DHS Exit Survey** The DHS 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 for separating PWDs as the primary reason for leaving were: (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 for separating PWTDs 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 continued to include data on the six established disability program questions from hiring and recruitment to accommodations and accessibility. Details

		are provided in Section V: Plan to Improve Retention of Persons with Disabilities. ------------------
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	Yes	FY 2023 - Utilization Analysis by Grade Cluster (Perm) For the fifth consecutive year, DHS experienced an increase in both the GS-1- GS-10 and GS-11-SES Grade Clusters for PWDs when compared to the previous year as follows: PWDs Grade Cluster 1-10: 11.29 percent (below 12 percent) PWDs Grade Cluster 11-SES: 17.47 percent (above the 12 percent goal) Slight increases were reported for PWTDs in the GS-1- GS-10 and the GS-11-SES cluster, when compared to the previous year as follows: PWTDs Grade Cluster 1-10: 1.25 percent (below two percent) PWTDs Grade Cluster 11 – SES: 1.31 percent (below 2 percent) FY 2022 - Utilization Analysis by Grade Cluster (Perm) For the fourth consecutive year, DHS experienced an increase in both the GS-1- GS-10 and GS-11-SES Grade Clusters for PWDs when compared to the previous year as follows: PWDs Grade Cluster 1-10: 10.69 percent (below 12 percent) PWDs Grade Cluster 11-SES: 14.75 percent (above the 12 percent goal) A slight decrease was reported for PWTDs in the GS-1- GS-10 cluster, and an increase in the GS-11-SES cluster, when compared to the previous year as follows: PWTDs Grade Cluster 1-10: 1.21 percent (below two percent

		PWTDs Grade Cluster 11 – SES: 1.30 percent (below 2 percent) -------------		
Target Date (mm/dd/yyyy)	**Planned Activities**	**Sufficient Staffing & Funding (Yes or No)**	**Modified Date (mm/dd/yyyy)**	**Completion Date (mm/dd/yyyy)**
12/30/2017	Issue Annual Hiring Goals for PWDs and PWTDs then socialize throughout DHS.	Yes		12/27/2017
09/30/2018	Update DHS Disability training module for managers and HR Professionals (Employment of People with Disability: A Roadmap to Success Training)	Yes	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. § 1614.203(d)(5).	Yes		3/08/2018
09/30/2018	Collaborate with OCHCO to revise DHS's standard language on all vacancy announcements to encourage applicants with disabilities to apply, to clearly explain the Schedule A process, and provide information on requesting reasonable accommodations.	Yes	09/30/2019	4/18/2019
09/30/2018	Revise Reasonable Accommodation procedures to include procedures for providing Personal Assistance Services.	Yes	06/30/2021	03/23/2021
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
03/30/2018	Implement and post the Department's Affirmative Action plan for Individuals with Disabilities to the DHS website internally (DHS Connect) and externally (DHS.gov).	Yes	7/19/2018	07/19/2018
09/30/2020	Collaborate with OCHCO to explore the feasibility of considering disability status as a positive factor in hiring and promotions decisions to the extent permitted by law.	Yes	6/30/2023	6/30/2023
04/01/2019	Develop a bi-annual report to monitor Components' progress toward increasing the participation of PWDs and PWTDs in Mission Critical Occupations.	Yes	6/30/2021	9/30/2021
Fiscal Year	**Accomplishments**			
2017	N/A - Newly established.			
2018	Hiring Goals: During FY 2018, DHS set a 12 percent hiring goal for Persons with Disabilities (PWDs) at all grade levels; a two 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 and non-TSO positions, exceeding the goal and increasing by 35 percent from FY 2017.

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

Disability Training:
The Roadmap to Success training was updated during FY 2017 and FY 2018 to include the provision of amended 29 C.F.R. § 1614.203(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. DHS (Department-level), U.S. Coast Guard, the Transportation Security Administration, and U.S. Secret Service submitted either a draft or their final revised procedures to the EEOC for review and approval pursuant to Executive Order 13164, during the reporting period. CRCL will continue to monitor and track the status and progress with the remaining Components in meeting this requirement. DHS's procedures require its Components to submit their updated reasonable accommodation procedures to CRCL for review prior to submission to EEOC.

Develop and post notice of rights under Section 508 and the Architectural Barriers Act on the internal and external websites.

	During FY 2018, DHS updated its web page, e.g., internal DHS Connect page (http://dhsconnect.dhs.gov/pages/accessibility.aspx), for both accessibility and consistency to include a description of rights and how to file a complaint under Section 508. Implement and post FY 2017 Affirmative Action Report and FY 2018 Plan As required, DHS posted its FY 2017 Affirmative Action Report and FY 2018 Plan on DHS' public facing website at the following location: www.dhs.gov/reports-office-civil-rights-and-civil-liberties. CRCL continues to collaborate with OCHCO and DHS Components to ensure effective implementation of the AAP on a regular basis.
FY 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 USA Learning 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. § 1614.203(d)(5), CRCL continued to coordinate reviews during FY 2019. The Department's draft revision to Instruction Number 259-01-001, implementing DHS procedures for facilitating reasonable accommodation and personal assistance 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 the Component's 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 of the participation of PWDs and PWTDs in the DHS workforce.
FY 2020	Disability Training: DHS revised and expanded its DHS Roadmap to Success training module. CRCL secured funding and contracted with OPM USA Learning 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 assistance service requests remain 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 2021. 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 DHS 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.
FY 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 USA Learning. 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: - 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: 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.

FY 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 6for 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:
	• 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.
FY 2023	**Closed/Complete**
	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.

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

Nothing to report.

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

To be determined.

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

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

Trigger 2	Individuals with disabilities and targeted disabilities are receiving recognition and awards at rates lower than expected when compared to individuals without disabilities.	
Barrier(s)	Not Identified.	
Objective(s)	Collaborate with OCHCO to review recognition and awards policy, practices, and procedures, and determine next steps.	
Responsible Official(s)		**Performance Standards Address the Plan? (Yes or No)**
CRCL OCHCO		
Barrier Analysis Process Completed? (Yes or No)		**Barrier(s) Identified? (Yes or No)**
No		**No**
Sources of Data	**Sources Reviewed? (Yes or No)**	**Identify Information Collected**
Workforce Data Tables	**Yes**	**FY 2023 Update:** Based on a review of MD-715 Table B9-1: 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). PWDs received awards at rates lower than expected in two of the thirteen (13) categories, and PWTDs received awards at lower-than-expected rates in three of the categories, representing a significant improvement compared to FY 2022. Award categories where PWD and PWTD received below the inclusion rate of PWOD were as follows: PWDs: Time-Off Awards 1 – 10 hours Cash Awards $500 and Under PWTDs: Time-Off Awards 11 – 20 hours Cash Awards $500 and Under Cash Awards $1,000 – $1,999 Section IV, C. Awards for detailed summary. --------------- **FY 2022 Update:** Based on a review of MD-715 Table B9-1: 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). PWDs received awards at rates lower than expected in six of the thirteen (13) categories, and PWTDs received awards at lower-than-expected rates in seven of the categories, as follows:

		PWDs: Time-Off Awards 1 – 10 hours Time-Off Awards 21 – 30 hours Cash Awards $500 and Under: Cash Awards $501 - $999 Cash Awards $1,000 – $1,999: Cash Awards $2,000 - $2,999: PWTDs: Time-Off Awards 1 – 10 hours Time-Off Awards 11 – 20 hours Time-Off Awards 21 – 30 hours Cash Awards $500 and Under: Cash Awards $501 - $999 Cash Awards $1,000 – $1,999: Cash Awards $2,000 - $2,999: Section IV, C. Awards for detailed summary. ----------------
Complaint Data (Trends)	Yes	FY 2023 462 Report: DHS reported seven out of 23 filed complaints; three out of nine settlements were based on disability and awards during FY 2023, representing a slight increase compared to the prior year. ----------------- FY 2022 462 Report: DHS reported six out of 27 filed complaints; two out of 24 settlements were based on disability and awards during FY 2022, representing a significant increase compared to the prior year. --------------------
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	FY 2023: For the fifth consecutive year, DHS had no findings of disability discrimination based on awards. -------
Climate Assessment Survey (e.g., FEVS)	Yes	**2023 FEVS:** Compared to 2022, the PWD average on the overall FEVS decreased for the second year in a row, from 60.6 percent positive to 56.3 percent positive. However, when looking at the following select core questions, PWD showed a slight increase from 60.5 in 2022 to 62.8 percent positive in 2023. FEVS Survey Results

		Question 8, "I can disclose a suspected violation of any law, rule or regulation without fear of reprisal," was rated 59.2 percent positive by PWDs in 2023, compared to 59.0 percent positive in 2021. While this represents a nominal increase, PWDs reported nearly 6.0 percent lower than PWODs (65 percent).
		Question 17 (formally 16), "In my work unit, differences in performance are recognized in a meaningful way," was rated by PWD 39.7 percent in 2023, compared to 36.2 percent positive in 2022, representing an increase of over 3 percent.
		Question 45 (formally 42), "In my organization, arbitrary action, personal favoritism and/or political coercion are not tolerated," was rated 42 percent (2 percentage points lower than PWOD) positive by PWDs in 2023, compared to 38.6 percent positive in 2022. No comparison to FY 21 is available for this question.
		Question 49 (formally 47), "My supervisor supports my need to balance work and other life issues," was rated 78.1 percent positive by PWDs in 2023, compared to 76.4 percent positive in 2022. No significant difference was reported in 2023 when comparing to PWOD.
		Question 51 (formally 49), "My supervisor treats me with respect," was rated 82.1 percent positive by PWDs in 2023 and 81.0 percent positive in 2022. When comparing to PWOD, PWD percent positive was nearly 3 percent lower.
		Question 55 (formally 53), "My supervisor provides me with constructive suggestions to improve my job performance," rated 68.3 percent positive by PWDs, compared to 65.4 in 2022. When comparing to PWOD, PWD percent positive was over 2 percentage points lower.
		Question 56 (formally 54), "My supervisor provides me with performance feedback throughout the year," was rated 72.2 percent positive by PWDs, compared to 70.5 percent positive in 2022 and 74.5 percent positive for PWOD.
		Question 70 (formally 68), "Considering everything, how satisfied are you with your job?", was rated 61.1 percent positive by PWDs in 2023, up 4 percentage points from 56.9 percent positive in 2022.

| | | The Best Places to Work rating is based on percent positive responses to three FEVS questions. Based on the questions provided below, the overall percent positive in 2023 for PWD was 59.3 percent, representing nearly a 5 percent increase when compared to 54.4 percent in 2022. When compared to PWOD, PWD rated 3 percentage points lower.

Question 46 (formally 43) I recommend my organization as a good place to work,

Question 70 (formally 68) Considering everything, how satisfied are you with your job?,

Question 72 (formally 70) Considering everything, how satisfied are you with your organization?

No changes were reported for PWD in the DEIA Index. PWD percent positive response rate of 62.4 percent continues to be lower than their counterparts without disabilities 66.3 percent.

Accessibility Needs Questions: A significant increase was noted based on the three questions covering accessibility needs for PWD (Questions 83, 84, and 85). In 2023, the percent positive for PWD was 63.1 percent compared to 56.2 percent in 2022, representing an increase of 3.2 percent, but lower than PWOD, with a percent positive rating of 63.1 percent.

2022 FEVS:

The 2022 FEVS consisted of substantially different questions than earlier versions of the FEVS, so the differences in overall averages should be interpreted with caution. Compared to 2021, the PWD average on the core items dropped from 64.5 percent positive to 60.0 percent positive. As noted above, the 2022 FEVS differed substantially from the 2021 FEVS, with the notable addition of DEIA-specific questions, with respect to which PWDs report substantially lower percent positive ratings compared to PWODs.

FEVS Survey Results

Question 8, "I can disclose a suspected violation of any law, rule or regulation without fear of reprisal," was rated 59.0 percent positive by PWDs in 2022, compared to 56.8 percent positive in 2021. While this represents an increase, PWDs |

		reported nearly 5.3 percent lower than PWODs (64.3 percent).
		Question 16, "In my work unit, differences in performance are recognized in a meaningful way," was rated by PWD 36.2 percent in 2022, compared to 44.3 percent positive in 2021.
		Question 42, "In my organization, arbitrary action, personal favoritism and/or political coercion are not tolerated," was rated 38.6 percent positive by PWDs, compared to 41.0 percent positive by PWODs. No comparison to FY 21 is available for this question.
		Question 47, "My supervisor supports my need to balance work and other life issues," was rated 76.4 percent positive by PWDs in 2022, compared to 76.6 percent positive in 2021.
		Question 49, "My supervisor treats me with respect," was rated 81.0 percent positive by PWDs in 2022 and 80.1 percent positive in 2021.
		Question 53, "My supervisor provides me with constructive suggestions to improve my job performance," was rated 65.4 percent positive by PWDs, compared to 68.2 percent positive by PWODs.
		Question 54, "My supervisor provides me with performance feedback throughout the year," was rated 70.5 percent positive by PWDs, compared to 72.3 percent positive by PWODs.
		Question 68, "Considering everything, how satisfied are you with your job?", was rated 56.9 percent positive by PWDs in 2022, down from 57.7 percent positive in 2021.
		The Best Places to Work rating is based on answers to three FEVS questions: • I recommend my organization as a good place to work. • Considering everything, how satisfied are you with your job? • Considering everything, how satisfied are you with your organization? In 2021, PWDs rated these questions an average of 55.1 percent positive, and the average dropped

		in 2022 to 54.4 percent positive. PWODs rated these questions higher at 56.1 percent positive in 2022. The Governmentwide average (all employees) on these three questions in 2022 was 63.6 percent.

Eleven questions were added in 2022 to address DEIA issues. PWDs rated these questions 62.4 percent positive, compared to 67.6 percent positive for PWODs. The Governmentwide average (all employees) was 71.9 percent.

Three questions were added in 2022 related to accessibility needs. PWDs, who are the individuals most likely to need or seek accessibility services, rated these items 56.2 percent positive, compared to the Governmentwide average (all employees) of 66.9 percent. |
| Exit Interview Data | Yes | FY 2023 Update:
Exit Survey: Review of the FY 23 Exit Survey revealed that 40 out of 467 selected Salary/Pay as the primary reason for leaving the agency. Of the 40 respondents, PWDs represented 15.0 percent (6/40) and PWTDs represented 5.0 percent (2/40). Salary/Pay wasn't one of the top three reasons for leaving for either PWDs or PWTDs. Neither group had any employees selecting "Recognition" as a primary reason for leaving, and additional review did not find any additional information based on Awards or Bonuses.

FY 2022 Update:
Exit Survey: Review of the FY 22 Exit Survey revealed that 56 out of 1,115 respondents selected Salary/Pay as the primary reason for leaving the agency. Of the 56 respondents, PWDs represented 8.9 percent (5/56) and PWTDs represented 7.1 percent (4/56). Salary/Pay was one of 3 top reasons for separating PWTDs. No PWDs or PWTDs selected "Recognition" as a primary reason for leaving, and additional review did not find any additional information based on Awards or Bonuses.
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Focus Groups	No	
Interviews	No	
Reports (e.g., Congress,	No	

EEOC, MSPB, GAO, OPM)				
Other (Please Describe)	N/A			

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2018	Collaborate with OCHCO to review recognition and awards policy, practices, and procedures, and determine next steps.	Yes	09/30/2020	09/30/2020
09/30/2021	Expand review of recognition and award practices across DHS. (new)	Yes	09/30/2023	09/30/2023

Fiscal Year	Accomplishments
2017	N/A - Newly established.
2018	During FY 2018, CRCL identified initial data sources and policies and procedures at the department level to begin review. As reported above, data sources reviewed include workforce data tables, complaint data, Federal Employment Viewpoint Survey responses, and the DHS Exit Interview Survey report. 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
FY 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 Component Directives Manager is responsible for affirmatively indicating to the DHS Directives Manager what appropriate action is necessary to maintain the Directive or Instruction upon receipt of the notice from the DHS Directives Manager, that a two-year review is due. Based on this process, all policies and procedures identified are reviewed every two years by the Office of the Chief Human Capital Officer. To date, no potential barriers have been identified.

	CRCL will continue to coordinate and collaborate with OCHCO to ensure perceived or actual barriers that may be caused by DHS award policies or associated procedures are addressed.

FY 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
	     255-01-001 Instruction guide on Honorary Awards
	     255-12 Approval of Monetary Awards over $6,000

FY 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.
FY 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 human 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.
FY 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.

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

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

To be determined.

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

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

Trigger 3	Lower than expected conversion rates of eligible Schedule A employees into competitive service.
Barrier(s)	
Objective(s)	Increase conversion rates of eligible Schedule A employees.

Responsible Official(s)	Performance Standards Address the Plan? (Yes or No)
CRCL OCHCO	

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

Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	**Yes**	
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	Yes	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	Yes	Ad-hoc workforce data on conversions – not included in the MD-715 data tables

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

09/30/2018	Review and analyze current policies and procedures for excepted service appointments.	Yes		09/30/2018
01/30/2018	Monitor Schedule A Conversions on a quarterly basis.	Yes		12/12/2018
09/30/2018	Coordinate efforts with OCHCO to develop DHS Schedule A guidance.	Yes	06/30/2023	09/30/2023

Fiscal Year	Accomplishments
2017	N/A - Newly established.

2018	During FY 2018, DHS converted a total of 157 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 55.28 percent conversion rate. Of those converted, 138 were converted non-competitively after two years of satisfactory service, 15 converted to career or career conditional before two years of service, and four were converted by other means. Overall, DHS experienced an increase in conversions when compared to 101, or 53 percent during FY 2017.
	
	Review and analyze current policies and procedures for excepted service appointments. CRCL, in coordination with OCHCO/SRDI, began reviewing existing policies and procedures at the Department level during FY 2018. As a result, we identified several excepted service policies, and found that procedures for Schedule A, 5 C.F.R. § 213.3102(u), for hiring people with severe physical disabilities, psychiatric disabilities, and intellectual disabilities, are not included.
	
	Monitoring Schedule A Conversions on a quarterly basis.
	CRCL has developed a Schedule A reporting and tracking tool to monitor DHS' Schedule A workforce by Components. The tracking tool provides a summary review of Schedule A employees by:
	
	• Total Eligible
	• Total Converted
	  o Conversions to career or career conditional after 24 months
	  o Conversions to career or career conditional before 24 months
	  o Conversion Other
	  o Separated before conversion
	• Total Separations
	• Eligible not Converted
	• No Longer Eligible at end of FY 2018 (but was eligible at some point in the given year)
	• Not Eligible for Conversion
	
	CRCL shares updated summary reports with all Components through the Disability Employment Advisory Council, which includes Component level Disability Program Managers and Selective Placement Program Coordinators. Upon request, CRCL provides detailed reports to support follow-up actions at the Component level as necessary and 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 federal agencies to identify Schedule A best practices. As a result, SRDI has drafted a proposed standard operating procedure which is currently in the review process.

FY 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:
	
	• Total Schedule A Workforce
	• Total Eligible
	• Total Converted
	    o Conversions to career or career conditional after 24 months
	    o Conversions to career or career conditional before 24 months
	    o Conversion Other
	    o Separated before conversion
	• Total Separations
	• Eligible not Converted
	• No Longer Eligible at end of FY 2018 (but was eligible at some point in the given year)
	• Not Eligible for Conversion
	
	Coordinate efforts with OCHCO to develop DHS Schedule guidance.
	Modified planned activity description to change efforts from developing policy and procedures to developing Schedule A guidance and to update target date for completion until 9/30/2020.
	CRCL and OCHCO are continuing these efforts to develop and implement guidance with sound strategies and best practices for utilizing the Schedule A appointment authority for employment, retention, and career development opportunities. DHS plans to socialize and implement the final guidance by 2021.
	
	To support this effort, CRCL developed a DHS Schedule A Fact Sheet. The fact sheet is a high-level overview of the Schedule A Hiring Authority and provides prospective candidates with disabilities an overview on applying for positions within DHS utilizing Schedule A, along with a list of DHS Selective Placement Program Coordinators.
	
	Additionally, on Tuesday, July 30, 2019, DHS hosted a webinar on recruiting and hiring individuals with disabilities and targeted disabilities. Over 30 supervisors, hiring managers, recruiters, and human resources specialists participated to increase awareness of this topic. A post-webinar survey indicated 81 percent of the participants said they increased their knowledge of Schedule A direct hiring authority from 34 percent prior to the webinar. Fifty-eight percent of the participants indicated they increased knowledge of the Bender program from 17 percent prior to the webinar.

FY 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 percent 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. |
| FY 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.
FY 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.
FY 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.

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

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

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

> To be determined.

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

> DHS 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.

Trigger 4	Higher than expected separation rates for individuals with disabilities.
Barrier(s)	
Objective(s)	Increase retention rates of individuals with disabilities and targeted disabilities.

Responsible Official(s)	Performance Standards Address the Plan? (Yes or No)
CRCL OCHCO	

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

Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	FY 2023 Update: B1: Total Workforce Distribution by Disability/ Employee Loss indicates an increase when compared to FY 2022, representing 17.80 percent in FY 2023 compared to 15.71 percent in FY 2022. Separations for PWTDs during FY 2023 increased compared to FY 2022, representing 1.70 percent compared to 1.49 percent in FY 2022. Separation rates for both groups are above their workforce participation rates. When comparing separation rates by the inclusion benchmarks, both groups are exceeding the rates of PWODs for both voluntary and involuntary separations. -------------- FY 2022 Update: B1: Total Workforce Distribution by Disability/ Employee Loss indicates an increase when compared to FY 2021, representing 15.71 percent in FY 2022 compared to 14.43 percent in FY 2021. Separations for PWTDs during FY 2022 decreased compared to FY 2021, representing 1.49 percent compared to 1.76 percent in FY 2021. When comparing separation rates by the inclusion benchmarks, both groups are exceeding the rates of PWODs for both voluntary and involuntary separations. ----------------------------
Complaint Data (Trends)	Yes	FY 2023 Update: 462 – (Part IV) Bases and Issues Alleged in Complaints Filed: DHS experienced an increase from 113 in FY 2022 to 115 in FY 2023 in total number of complaints alleging

		failure to accommodate resulting in a percent change of 1.77 percent. While a decrease was noted from 202 in FY 2022 to 197 during FY 2023 in the total number of complaints alleging harassment based on disability resulting in a percent change of -2.48 percent. No FEAR Act Report (FY 2022 4th Qtr.) In FY 2023, complaints filed based on disability dropped for the first time in over the last eight years (FY 2014 – FY 2022), representing 16.53% compared to 30.91 percent of all complaints in FY 2022. Disability discrimination was alleged in 492 complaints, representing a percent decrease of 2.77 percent compared to the prior year when discrimination based on disability was raised in 506 complaints. Considering complaints by issue, complaints based on "reasonable accommodation" ranked sixth out of twenty-four issues during FY 2023 compared to seventh in FY 2022, and complaints by issue "medical examination," dropped significantly from 200 in FY 22 to 38 in FY 23, moving out of the top ten most common issues raised. ----------- FY 2022 Update: 462 – (Part IV) Bases and Issues Alleged in Complaints Filed: DHS experienced an increase from 84 in FY 2021 to 113 in FY 2022 in total number of complaints alleging failure to accommodate resulting in a percent change of 34.52 percent. DHS also experienced an increase from 159 in FY 2021 to 202 in FY 2022 in the total number of complaints alleging harassment based on disability resulting in a percent change of 27.04 percent. No FEAR Act Report (FY 2022 4th Qtr.) Complaints filed based on disability continued to increase in the last eight years (FY 2014 – FY 2022) from 13.60 percent of all complaints to 30.91 percent of all complaints in FY 2022. Disability discrimination was alleged in 506 complaints, which is a 2.18 percent increase over the prior year when discrimination based on disability was raised in 331 complaints. Considering complaints by issue, complaints based on "reasonable accommodation" ranked seventh out of twenty-four issues during FY 2022 compared to sixth in FY 2021, and complaints by issue "medical examination," rose significantly from 15 in FY 21 to 199 in FY 22, moving to the fifth most common issue raised.

Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	2023 FEVS: Compared to 2022, the PWD average on the core items dropped from 60.65 percent positive to 56.3 percent positive. Using the DEIA index, PWD percent positive rating remained the same compared to FY 2022 at 62.4 percent positive. 2022 FEVS: The 2022 FEVS consisted of substantially different questions than earlier versions of the FEVS so the differences in overall averages should be interpreted with caution. Compared to 2021, the PWD average on the core items dropped from 64.5 percent positive to 60.0 percent positive. As noted above, the 2022 FEVS differed substantially from the 2021 FEVS with the notable addition of DEIA-specific questions, which PWD's report substantially lower percent positive ratings compared to non-PWDs. FEVS Survey Results Question 8, "I can disclose a suspected violation of any law, rule or regulation without fear of reprisal," was rated 59.0 percent positive by PWDs in 2022 compared to 56.8 percent positive in 2021. While this represents an increase, PWDs reported nearly 5.3 percent lower than PWODs (64.3 percent). Question 16, "In my work unit, differences in performance are recognized in a meaningful way," was rated 36.2 percent by PWDs in 2022 compared to 44.3 percent positive in 2021. Question 42, "In my organization, arbitrary action, personal favoritism and/or political coercion are not tolerated," was rated 38.6 percent positive by PWDs compared to 41.0 percent positive by PWODs. No comparison to FY 21 is available for this question. Question 47, "My supervisor supports my need to balance work and other life issues," was rated 76.4 percent positive by PWDs in 2022 compared to 76.6 percent positive in 2021.

			Question 49, "My supervisor treats me with respect," was rated 81.0 percent positive by PWDs in 2022 and 80.1 percent positive in 2021. Question 53, "My supervisor provides me with constructive suggestions to improve my job performance," was rated 65.4 percent positive by PWDs compared to 68.2 percent positive by PWODs. Question 54, "My supervisor provides me with performance feedback throughout the year," was rated 70.5 percent positive by PWDs compared to 72.3 percent positive by PWODs. Question 68, Considering everything, how satisfied are you with your job?, was rated 56.9 percent positive in 2022, down from 57.7 percent positive in 2021. The Best Places to Work rating is based on answers to three FEVS questions. In 2021, PWDs rated these questions an average of 55.1 percent positive, and the average dropped in 2022 to 54.4 percent positive. PWODs rated these questions higher at 56.1 percent positive in 2022. The Governmentwide average (all employees) on these three questions in 2022 was 63.6 percent. Eleven questions were added to the FEVS in 2022 to address DEIA issues. PWDs rated these questions 62.4 percent positive compared to 67.6 percent positive for non-PWDs. The Governmentwide average (all employees) was 71.9 percent. Three questions were added to the FEVS in 2022 related to accessibility needs. PWDs, who are the individuals most likely to need or seek accessibility services, rated these items 56.2 percent positive compared to the Governmentwide average (all employees) of 66.9 percent.
Exit Interview Data		No	See update under accomplishments.
Focus Groups		No	
Interviews		No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)		No	
Other (Please Describe)		No	
Target Date (mm/dd/yyyy)	**Planned Activities**	**Sufficient Staffing & Funding (Yes or No)**	**Modified Date (mm/dd/yyyy)**	**Completion Date (mm/dd/yyyy)**

01/30/2018	Review and analyze exit surveys to identify barriers to retention. (annually)	Yes	12/30/2021	12/15/2021
01/30/2018	Monitor separations on a quarterly basis by disability distribution.	Yes		10/16/2018
06/30/2018	Collaborate with OCHCO to explore the feasibility of implementing new retention programs specifically for PWDs and PWTDs.	Yes	09/30/2022	9/30/2022
09/14/2018	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
Fiscal Year	**Accomplishments**			
FY 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 to examine the low participation rates overall. The working group led by the DHS Engagement Team Lead, Chief Learning and Engagement Office, OCHCO consists of representatives from all DHS Components including representatives from CRCL. The initial goal of the working group was to review current DHS Exit Survey and Component Exit Surveys and provide recommended changes to the DHS survey to improve participation and usefulness of the data. The working group was tasked to also review off-boarding practices related to the exit survey to determine best practices for improving participation. CRCL representatives ensured consideration of disability-related questions and sought their inclusion in the final

	submission of established core questions. The working group planned to achieve the goals outlined above and to begin implementation by April 2019.

The target date for completion on this activity was scheduled to be extended for two years to allow DHS to obtain reliable data to determine why employees with disabilities were leaving at a higher rate than employees without disabilities based on the inclusion benchmark.

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. |
| FY 2019 | **Review and analyze exit surveys to identify barriers to retention**.
Modified target date due to the transitional period in FY 2019. Two additional Components implemented Component specific exit surveys, further decentralizing the exit survey program within DHS.
Additional efforts during FY 2019 included adding three additional disability-related questions to the DHS Survey. The same questions were shared with the Components who administer their own exit surveys. As a result of the coordinated efforts of CRCL and OCHCO, the questions now include:

1. **DHS proactively supports efforts to improve the recruitment, hiring, advancement, and retention of individuals with disabilities.**
   Matrix scale:

	Strongly Disagree	*Disagree*	*Neither Agree nor 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	*Disagree*	*Neither Agree nor 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 nor 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.

FY 2020

Review and analyze exit surveys to identify barriers to retention.
Modified target date due to ongoing transitions during FY 2020. As a result, the DHS exit survey platform migrated from a SharePoint platform to a survey tool (SurveyMonkey) to better manage 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)
- 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.

FY 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:

1. **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%**

Favorable response rates declined from FY 2020 to FY 2021 for all groups. PWD had the highest favorable response rate, with similar rates from both PWTD and PWOD.

2. **DHS took appropriate steps to ensure reasonable accommodation and/or Personal Assistance Services were provided to qualified individuals with disabilities.**

	FY 20	**FY 21**
PWOD	**42.02%**	**33.64%**
PWD	**48.57%**	**33.80%**
PWTD	**43.75%**	**29.42%**

Favorable response rates declined from FY 2020 to FY 2021 for all groups. PWD had the highest favorable response rate, with PWTD having the lowest favorable rate in FY 2021.

3. **DHS proactively supported efforts to improve the RECRUITMENT of individuals with disabilities.**

	FY 20	**FY 21**
PWOD	**36.96%**	**28.29%**
PWD	**22.86%**	**23.89%**
PWTD	**43.75%**	**32.35%**

Favorable response rates declined from FY 2020 to FY 2021 for all groups. PWTD had the highest favorable response rate, with PWD having the lowest favorable rate during both years.

4. **DHS proactively supported efforts to improve the HIRING of individuals with disabilities.**

	FY 20	**FY 21**
PWOD	**25.73%**	**28.43%**
PWD	**57.32%**	**33.81%**
PWTD	**56.35%**	**32.35%**

	Favorable response rates declined from FY 2020 to FY 2021 for PWD and PWTD. Both PWD and PWTD had higher favorable response rates, when compared to PWOD during both years.

5. **DHS proactively supported efforts to improve the ADVANCEMENT of individuals with disabilities.**

	FY 20	**FY 21**
PWOD	**33.34%**	**28.56%**
PWD	**45.72%**	**32.39%**
PWTD	**18.75%**	**26.47%**

Favorable response rates declined from FY 2020 to FY 2021 for PWOD and PWD.
PWTD had the lowest favorable response rates, when compared to PWOD and PWD during both years.

6. **DHS proactively supported efforts to improve the RETENTION of individuals with disabilities.**

	FY 20	**FY 21**
PWOD	**32.24%**	**27.91%**
PWD	**17.14%**	**33.80%**
PWTD	**31.25%**	**26.47%**

Favorable response rates declined from FY 2020 to FY 2021 for PWOD and PWTD, while rates increased significantly for PWD.

DHS will continue to review and monitor exit survey results and will include a full summary of results and perspectives in the DHD Disability Barrier Analysis report in FY 2022.

Explore feasibility of implementing new retention programs specifically for PWDs and PWTDs.

During FY 2021, the second cohort of the DHS Disability Mentoring Program was launched. This program provides valuable career development opportunities for both mentors and mentees with disabilities. It also provided participants with the opportunity to learn from and network with colleagues across DHS. The program matched participants from across the Department and provided a forum to gain insight and perspective on the various career opportunities DHS had to offer. Mentee applicants were required to self-identify as having a disability as a condition to acceptance in the program. Mentor applicants were not required to self-identify as having a disability.

Due to the continuing challenges of COVID and other priorities, OCHCO has not considered or implemented any additional disability specific retention programs. However, DHS continues to promote the DHS Headquarters Mentoring program and all other career development programs including the Supervisory Leadership Bridges Self Development Program. |
| FY 2022 | **FY 2022 Update – DHS Exit Survey**
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.

2. **DHS took appropriate steps to ensure reasonable accommodation and/or Personal Assistance Services were provided to qualified individuals with disabilities.**

	FY 20	FY 21	FY 22
PWOD	42.02%	33.64%	46.58%
PWD	48.57%	33.80%	64.04%
PWTD	43.75%	29.42%	59.65%

Favorable response rates increased from FY 2021 to FY 2022 for all groups. PWD had the highest favorable response rate, with PWOD having the lowest favorable rate in FY 2022.

3. **DHS proactively supported efforts to improve the RECRUITMENT of individuals with disabilities.**

	FY 20	FY 21	FY 22
PWOD	36.96%	28.29%	40.70%
PWD	22.86%	23.89%	50.00%
PWTD	43.75%	32.35%	47.37%

Favorable response rates increased from FY 2021 to FY 2022 for all groups. PWD had the highest favorable response rate, with PWOD having the lowest favorable rate.

4. **DHS proactively supported efforts to improve the HIRING of individuals with disabilities.**

	FY 20	FY 21	FY 22
PWOD	25.73%	28.43%	39.90%
PWD	57.32%	33.81%	50.00%
PWTD	56.35%	32.35%	45.61%

	Favorable response rates increased from FY 2021 to FY 2022 for all groups. Both PWD and PWTD had higher favorable response rates, when compared to PWOD for all three years.
	
	5. **DHS proactively supported efforts to improve the ADVANCEMENT of individuals with disabilities.**
	
	                        FY 20 **FY 21** **FY 22**
	    PWOD 33.34% 28.56% 39.43%
	    PWD 45.72% 32.39% 44.74%
	    PWTD 18.75% 26.47% 45.61%
	
	    Favorable response rates increased from FY 2021 to FY 2022 for all groups. PWTD had the highest increase in favorable response rates, when compared to PWOD and PWD.
	
	6. **DHS proactively supported efforts to improve the RETENTION of individuals with disabilities.**
	
	                        FY 20 **FY 21** **FY 22**
	    PWOD 32.24% 27.91% 38.63%
	    PWD 17.14% 33.80% 44.74%
	    PWTD 31.25% 26.47% 47.37%
	
	    Favorable response rates increased from FY 2021 to FY 2022 for all groups. PWTD had a significantly higher rate than PWOD and PWD.
	
	During FY 2022, DHS experienced a significant increase in favorable responses from all groups. However, questions covering recruitment, hiring, advancement and retention, all had favorable response rates at or below 50 percent. DHS will continue to monitor and will include a full summary of results and perspectives in the DHS Disability Barrier Analysis report in FY 2023.
	
	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.

FY 2023	**FY 2023 Update – DHS Exit Survey** **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)

The 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.

1. DHS took appropriate steps to ensure accessibility (technology and facility) requirements were met for qualified individuals of disabilities.

	FY 20	FY 21	FY22	FY23
PWOD	76.86%	67.64%	68.00%	65.92%
PWD	58.62%	50.91%	60.87%	57.14%
PWTD	46.67%	41.38%	51.02%	55.88%

Favorable response rates are higher from PWOD respondents in all years. The percentages decreased slightly for PWOD and PWD in FY 2023 and increased for PWTD.

2. DHS took appropriate steps to ensure reasonable accommodation and/or Personal Assistance Services were provided to qualified individuals with disabilities.

	FY 20	FY 21	FY 22	FY23
PWOD	72.41%	63.61%	68.11%	61.38%
PWD	58.62%	34.55%	56.38%	55.84%
PWTD	46.67%	26.67%	46.94%	51.43%

Favorable response rates are higher from PWOD respondents in all years. The percentages decreased slightly for PWOD and PWD in FY 2023 and increased for PWTD.

3. DHS proactively supported efforts to improve the RECRUITMENT of individuals with disabilities.

	FY 20	FY 21	FY 22	FY23
PWOD	47.86%	51.21%	54.90%	47.97%
PWD	29.63%	27.50%	40.00%	44.44%
PWTD	30.77%	29.17%	34.88%	41.38%

Favorable response rates are higher from PWOD respondents in all years. The percentages decreased slightly for PWOD in FY 2023 and increased for PWD and PWTD.

4. DHS proactively supported efforts to improve the HIRING of individuals with disabilities.

	FY 20	FY 21	FY 22	FY23
PWOD	44.25%	51.23%	54.84%	47.44%

PWD	34.62%	27.50%	41.33%	46.77%
PWTD	38.46%	26.09%	34.15%	44.44%

Favorable response rates are higher from PWOD respondents in all years. The percentages decreased slightly for PWOD in FY 2023 and increased for PWD and PWTD.

5. DHS proactively supported efforts to improve the ADVANCEMENT of individuals with disabilities.

	FY 20	FY 21	FY 22	FY23
PWOD	42.45%	47.48%	50.36%	42.98%
PWD	26.92%	14.63%	32.47%	34.92%
PWTD	25.00%	12.00%	18.60%	30.00%

Favorable response rates are higher from PWOD respondents in all years. The percentages decreased slightly for PWOD in FY 2023 and increased for PWD and PWTD.

6. DHS proactively supported efforts to improve the RETENTION of individuals with disabilities.

	FY 20	FY 21	FY 22	FY23
PWOD	39.62%	46.67%	49.82%	39.50%
PWD	21.43%	12.77%	25.93%	33.80%
PWTD	21.43%	11.11%	21.74%	30.56%

Favorable response rates are higher from PWOD respondents in all years. The percentages decreased slightly for PWOD in FY 2023 and increased for PWD and PWTD.

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:

- Total Number of RA, PAS, and PWFA Requests (as of the end of each quarter)
- Reasonable Accommodation Processing Timeframes
- Staffing and Resources to Support the Reasonable Accommodation Program
- Status of Compliant Reasonable Accommodation Procedures
- Procedures Posted to Internal and External Website
- 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.)

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

Exit Surveys – Low response rate and reliable data. CRCL will continue to serve on the working group and provide recommendations and technical guidance.

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

To be determined.

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

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.

Trigger (new)	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.
Barrier(s)	Policies, procedures, practices, and conditions that most directly impact 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 to address the potential barrier.
Objective(s)	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.

Responsible Official(s)	**Performance Standards Address the Plan?** **(Yes or No)**
Veronica Venture, Deputy CRCL Officer & Director of Equal Employment Opportunity, and Diversity, CRCL Ambuja Bale, Director, Diversity Management Section (DMS), CRCL Laura Davis, Departmental Disability Employment Program Manager, (EEOD/DMS), CRCL Roland Edwards, Chief Human Capital Officer, OCHCO EEO Directors, DHS Components	Yes (all)

Barrier Analysis Process Completed? **(Yes or No)**	**Barrier(s) Identified?** **(Yes or No)**
See Component MD-715 Reports	**See Component MD-715 Reports**

Sources of Data	**Sources Reviewed?** **(Yes or No)**	**Identify Information Collected**
Workforce Data Tables	Yes	See Department and Component MD-715 Reports
Complaint Data (Trends)	Yes	
Grievance Data (Trends)	No	

Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No				
Climate Assessment Survey (e.g., FEVS)	No				
Exit Interview Data	No				
Focus Groups	No				
Interviews	No				
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No				
Other (Please Describe)	No				

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
9/30/2023	Provide consultation and staff resources. The Department EEO Office (CRCL, DMS) will consult with DHS Components on data analysis/trigger identification, barrier analysis, and provide Department-level staff to serve on Component EEO staff hiring panels, selection panels for barrier analysis contractors, and Component led barrier analysis teams.		9/30/2024 Updated Annually	
10/31/2023	Technical Assistance Visits. CRCL/DMS will review each DHS Component's prior year MD-715 report then meet with each Component. In the meetings, DHS Department staff review and identify opportunities and offer technical assistance to further barrier analysis efforts.		10/31/2024 Updated Annually	
09/31/2024	Develop and provide barrier analysis tools for DHS Components. CRCL/DMS will develop barrier analysis tools consistent with EEOC guidance to assist DHS Components with their barrier analysis efforts. Tools will be provided initially to 1-2 Components and assessed for effectiveness. The tools to be developed and provided to the DHS Components will consist of template			

	surveys/questionnaires, focus group facilitation protocols (including root cause analysis), sample questions, and template barrier analysis reports. Tools may be refined based on feedback from the Components.			
09/30/2024	Conduct MD-715/barrier analysis training. CRCL/DMS will develop and deliver MD-715/barrier analysis training covering topics such as MD-715 reporting requirements, developing a barrier analysis plan, collecting supplemental/qualitative data using surveys, interpreting results to identify potential barriers and root causes.			
09/30/2024	Lead Quarterly Disability Employment Advisory Council Meetings		Annually	
09/30/2024	Plan and coordinate department-wide disability employment awareness month observance program; support and partner with DHS disability focused employee associations; develop and maintain a variety of disability employment training and resources.		Annually	
Fiscal Year	**Accomplishments**			
2024	New Part J Trigger Plan. This plan replaces the prior trigger plans closed out in FY 2023. DHS will support Components barrier analysis efforts and provide ongoing technical support and guidance.			

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

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

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