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

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

Section I: Efforts to Reach Regulatory Goals

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

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

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

    b. Cluster GS-11 to SES (PWD)   Answer   No

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

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

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

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

    b. Cluster GS-11 to SES (PWTD)   Answer   Yes

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

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical Goal	--	12%		2%	
Grades GS-1 to GS-10					
Grades GS-11 to SES					

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

Numerical hiring goals are established for individuals with disabilities, targeted disabilities, and Schedule A hires, which are formally announced on an annual basis from the DHS OCHCO to all DHS Components via the Human Capital Leadership Council

(HCLC). The HCLC is composed of the senior human capital officials in OCHCO, the DHS Components, and other lines of business. The goals are further communicated to the Components' EEO and Diversity officials and staff, to be socialized and implemented throughout the Components via human resources, EEO, and Diversity practitioners and hiring officials. DHS continues to maintain a 12 percent hiring goal for Individuals with Disabilities at all grade levels; a 2 percent hiring goal for Individuals with Targeted Disabilities at all grade levels, excluding Law Enforcement and Transportation Security Officer occupations; and a 1.5 percent hiring goal for Schedule A hires, also excluding law enforcement and transportation security officer occupations. In FY 2019, 11.25 percent of all (permanent/temporary) new hires were PWDs, and 1.14 percent were PWTDs. When excluding non-law enforcement related and non-TSO positions, the percentage of PWTD new hires represented 1.96 percent, nearly meeting the 2 percent goal. In addition, Schedule A hires constituted 2.25 percent of all new hires in non-law enforcement related and non-TSO positions, exceeding the goal representing a percent increase of 41 percent compared to FY 2018 (1.6 percent).

Section II: Model Disability Program

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

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

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

Answer   Yes

CRCL's Equal Employment Opportunity and Diversity Division, has a full-time Departmental Disability Employment Program Manager who is responsible for implementing and maturing the DHS Disability Employment Program. Also, at the departmental level the OCHCO's Strategic Recruitment Diversity and Inclusion (SRDI) team has two assigned employees to support disability recruitment, career development, and retention programs across DHS. All DHS Components have identified personnel for the following programs: Selective Placement Program, Disability Employment Program, Reasonable Accommodation Program, Operations Warfighter Program, and 508 Program. Each Component maintains responsibility for servicing their respective workforce. The total FTEs are included in the counts in the following table

2. 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	
Special Emphasis Program for PWD and PWTD	16	1	0	Laura Davis Departmental Disability Employment Program Manager laura.davis@hq.dhs.gov
Section 508 Compliance	18	1	36	Cynthia Clinton-Brown Executive Director cynthia.clinton-brown@hq.dhs.gov
Architectural Barriers Act Compliance	53	1	0	Karl Johnson Executive Director
Answering questions from the public about hiring authorities that take disability into account	135	12	36	Laura Davis Departmental Disability Employment Program Manager laura.davis@hq.dhs.gov

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing reasonable accommodation requests from applicants and employees	29	4	36	Laura Davis (Departmental) Darlene Avery (HQ)
Processing applications from PWD and PWTD	92	9	28	Laura Davis Dept. Disability Employment Program Manager laura.davis@hq.dhs.gov

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

Answer   Yes

DHS CRCL/EEOD provided continuous training and guidance to all responsible staff to ensure they have the most up-to-date information and resources to carry out their responsibilities effectively, to include: • Leading Quarterly Disability Employment Advisory Council meetings covering ongoing program guidance, updates, and sharing of best practices across DHS Components. • Participation in the Federal Exchange on Employment & Disability (FEED), a federal interagency working group focused on information sharing, best practices, and collaborative partnerships designed to make the Federal government a model employer of people with disabilities. • Sponsored the Americans with Disabilities Act Training on July 25, 2019. Provided eight hours of training to more than 60 participants including disability program managers, reasonable accommodation program managers and coordinators, human capital professionals, and managers and supervisors from across DHS. This full day session was facilitated by David Fram, Esquire, National Employment Law Institute.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer   Yes

Upon review of each Component's response to compliance indicators and associated measures outlined in the Agency Self-Assessment, under B.4: The agency has sufficient budget and staffing to support the success of its EEO program. All Components are meeting the measures impacting successful implementation of the disability program during the reporting period. In support of this measure, CRCL continued to encourage all DHS Components to utilize the Accessibility Compliance Management System (ACMS) to manage and track reasonable accommodations during FY 2019. During FY 2019, CRCL worked with the Office of Accessible Systems and Technology (OAST) and DHS Components to develop and deploy the ACMS 2.0 reporting tool to include new reporting features consistent with the reporting and record keeping requirements of 29 C.F.R. § 1614.203. Collaboration efforts continue utilizing a cross-Component working group approach to address system architectural requirements. Completion is expected by the end of FY 2020.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]

Brief Description of Program Deficiency	A.2.b.3. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.

Brief Description of Program Deficiency	C.2.a.6. Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR §1614.203(d)(2)]

Brief Description of Program Deficiency	C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR §1614.203(d)(3)]

Brief Description of Program Deficiency	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.

Brief Description of Program Deficiency	C.2.c. Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR §1614.203(d)(6)]

Brief Description of Program Deficiency	C.2.c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.

Brief Description of Program Deficiency	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]

Brief Description of Program Deficiency	D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]

Brief Description of Program Deficiency	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.

Brief Description of Program Deficiency	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]

Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

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

Operational Components. Further development and refining of the system will continue throughout FY 2020. The DHS Corporate Recruitment Council (CRC) brings together key recruiting personnel from across DHS. The Council develops a "Top 25" list annually, of recruiting and outreach events that target diverse populations, including three that were focused on IWDs during FY 2019. DHS also issues the Component Recruitment and Outreach Plans (CROP) annually to assist Components with short and long-term planning for mission critical occupations. The CROPs contain Component recruiting and outreach information for the upcoming FY's activities focused on diverse populations, to include individuals with disabilities (IWD) and targeted disabilities (IWTD) as well as veterans and veterans with disabilities. Components provide details on planned activities to attract IWDs, IWTDs, veterans and veterans with disabilities. With the full implementation of the SMORE, the CROPs will be obsolete as this information will be easily maintained in the SMORE platform. Specifically, as it pertains to individuals with disabilities and targeted disabilities, DHS: • Participated on a Federal government panel during the Maryland State Department of Education, Division of Rehabilitation Services, National Disability Employment Awareness Month program. • Participated in Gallaudet University's Fall and Spring Career Fairs. • Promoted the top three recruiting events for PWDs/PWTDs on a monthly basis to the CRC to ensure Component attendance. The events included colleges/universities-sponsored programs, career fairs, and recruitment venues. • Maintains strategic partnerships with national disability advocacy groups and provides Components with recruitment resources for IWDs/IWTDs. DHS attended recruiting events at Gallaudet University, California State University, Northridge, National Technical Institute for the Deaf, Equal Opportunity Publications (EOP) Career Expo for People with Disabilities and Bender Virtual Career Fair for People with Disabilities. • Attended over 75 recruiting events during FY 2019 in over 25 states to attract candidates who identified as a PWD/PWTD. • Supported and promoted the Workforce Recruitment Program. • Supported and promoted the Operation Warfighter Program.

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: • 30 percent or More Disabled Veteran (5 U.S.C. § 3112; 5 C.F.R. § 316.302, 316.402, and 315.707) • Schedule A Appointing Authority (5 C.F.R. § 213.3102(u)) o TSA has its own distinct non-competitive appointment authority for hiring individuals with disabilities, that is comparable with the Schedule A Hiring Authority (HCM POLICY NO. 300-28), To increase and promote the use of these hiring authorities, goals are established annually. In FY 2019, DHS hired 251 individuals with disabilities utilizing the Schedule A Hiring Authority, representing 2.25 percent of new hires excluding Law Enforcement and Transportation Security Officer occupations, significantly exceeding the FY 2019 goal of 1.5 percent. Using the 30 Percent or More Disabled Veterans hiring authority, DHS hired an additional 1,148 individuals using authorities that take disability into account, representing 4.8 percent of all new hires.

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 both the Schedule A appointing authority (or equivalent for TSA) and the 30 Percent or More Disabled Veteran authority. Component Selective Placement Program Coordinators and Veterans Employment Program Managers are responsible for coordination of applicants who qualify under non-competitive authorities. The Department recognizes that while it has an established policy on administering the employment of veterans, it does not currently have a policy covering the Schedule A Appointment Authority for Individuals with Disabilities. During FY 2018, DHS initiated benchmarking efforts with other Federal agencies in efforts of drafting standard operating procedures (SOPs) focusing on sound strategies and best practices for utilizing the Schedule A appointment authority for employment, retention, and career development opportunities. DHS plans to socialize and implement the final SOPs by 2021. For detailed procedures on how DHS Components are handling and processing applicants eligible under both Schedule A and the 30 percent or More Disabled Veteran authority, please refer to each Component's MD-715 report.

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

Answer   Yes

DHS developed training for all hiring managers and human resources professionals entitled, "Employment of People with Disabilities: A Roadmap to Success," which includes information on Schedule A hiring authority as well as Veterans hiring authorities that take disability into account. The training is mandatory and must be taken within sixty (60) days from onboarding and every two years thereafter. The Roadmap to Success training was updated during FY 2017 to include the provision of the Final Rule amending 29 C.F.R 1614. § 1614.203(d)(5), as well as other necessary revisions. DHS plans to update and replace this training course by 2021. In addition, each Component provides a variety of training covering disability employment and reasonable accommodations. Please refer to each Component's MD 715 report for more details.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

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

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

    a. New Hires for Permanent Workforce (PWD)   Answer   Yes

    b. New Hires for Permanent Workforce (PWTD)   Answer   Yes

During FY 2019, DHS hired 2,223 PWDs, representing 10.97 percent of all permanent hires, a slight decrease from 11.03 percent of hires reported in FY 2018. DHS did not reach the hiring goal for PWTD. PWTD represented 1.08 percent of all permanent hires falling below the 2 percent hiring goal. Notably, when excluding law enforcement and transportation security officer occupations, DHS surpassed both the 12 percent hiring goal for PWD representing 19.97 percent of hires and the 2 percent hiring goal for PWD, representing 2.02 percent. Disability workforce data includes (1) employees who self-identify as having a disability, (2) employees appointed under Schedule A, and (3) 30 percent or more Disabled Veterans who do not otherwise identify as having a disability.

New Hires	Total	Reportable Disability		Targeted Disability	
		Permanent Workforce	Temporary Workforce	Permanent Workforce	Temporary Workforce
	(#)	(%)	(%)	(%)	(%)
% of Total Applicants	0				
% of Qualified Applicants	0				
% of New Hires	0				

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

a. New Hires for MCO (PWD)   Answer   Yes

b. New Hires for MCO (PWTD)   Answer   Yes

Based on a review of B6 New Hires by MCO which represents AFDs from USA Staffing/Cognos and Monster Government Solutions and actual hires data from the National Finance Center via AXIS for all DHS Components, triggers exist for the following occupations of the nine (9) priority mission-critical occupations for PWD and PWTD: PWD: Four out of nine MCOs 0083 – Law Enforcement: Qualified External Applicants not available for new hires; Selections 27.27 percent 1895 - Customs and Border Protection Officer: Qualified External Applicants not available for new hires; Selections 1.45 percent 1896 - Border Patrol Agent: Qualified External Applicants not available for new hires; Selections 0.47 percent 1881 - Customs and Border Protection Interdiction Agent: Qualified 16.67 percent; Selections 1.85 percent PWTD: Seven out of nine MCOs 0083 – Law Enforcement: Qualified External Applicants not available for new hires; Selections 27.27 percent 1802 - Compliance Inspection and Support: Qualified 1.61 percent; Selections 0.75 percent 1895 - Customs and Border Protection Officer: Qualified External Applicants not available for new hires; Selections 0.06 percent 1896 - Border Patrol Agent: Qualified External Applicants not available for new hires; Selections 0.20 percent 1811 - Criminal Investigator: Qualified 0.63 percent; Selections 0.00 percent 2210 - Information Technology Management: Qualified 2.32 percent; Selections 1.26 percent 0089 - Emergency Management Specialist: Qualified 4.80 percent; Selections 0.00 percent All of the above mission-critical occupations listed above, with the exception of 2210 and 0089, have physical and or medical requirements that cause lower than expected selection rates for PWTD. Note: Due to OPM restrictions on access to job applicant flow data, applicant flow data are only available for job announcements that are closed and fully audited. Because of this rule, certain MCO AFD was not available.

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

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

a. Qualified Applicants for MCO (PWD)   Answer   N/A

b. Qualified Applicants for MCO (PWTD)   Answer   N/A

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

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

a. Promotions for MCO (PWD)   Answer   Yes

b. Promotions for MCO (PWTD)   Answer   Yes

A review of B6 Internal Competitive Promotions by MCO was conducted. The applicant flow data was derived from USA Staffing/ Cognos and Monster Government Solutions along with the actual hires data from the National Finance Center via AXIS for all DHS Components. Triggers exist for the following occupations for PWDs and PWTDs when comparing the qualified applicant pool to the number of selections for promotions: PWDs 1802- Compliance Inspection and Support: Qualified 7.80 percent; Selections 4.36 percent 0089 - Emergency Management Specialist: Qualified 11.17 percent; Selections 8.93 percent PWTDs 1801 - General Inspection, Investigation & Compliance: Qualified 3.37 percent; Selections 2.05 percent 1895 - Customs and Border Protection

Officer: Qualified 0.25 percent; Selections 0.13 percent 1802 - Compliance Inspection and Support: Qualified 1.02 percent; Selections 0.45 percent 1881 - Customs and Border Protection Interdiction Agent: Qualified 0.19; Selections 0.00 percent 0089 - Emergency Management Specialist: Qualified 8.12 percent; Selections 0.89 percent 2210 - Information Technology Management: Qualified 3.58 percent; Selections 0.37 percent

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

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

A. ADVANCEMENT PROGRAM PLAN

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

All managers and supervisors are encouraged to promote the career development of all employees, including individuals with disabilities and individuals with targeted disabilities. CRCL continued to promote opportunities though its Disability Employment Advisory Council. CRCL requested that each Component Disability Program Manager share and encourage its employees with disabilities to participate in career development and advancement programs. In FY 2019, DHS reviewed the feasibility of developing a mentoring program focused on individuals with disabilities. A woman in law enforcement mentoring program launched in FY 2019 will be used as the model for DHS employees with disabilities in FY 2020. CRCL will implement the mentoring program in April 2020.

B. CAREER DEVELOPMENT OPPORTUNITES

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

The Department continues to offer various ways for employees to further their educational goals. In FY 2019, 28 employees participated in the Department of Defense Senior Service School master's degree programs. DHS also nominates employees to attend the Center for Homeland Defense and Security (CHDS) Masters and Executive Leaders Programs. DHS promotes the use of the OPM's Federal Academic Alliance programs where employees can take advantage of various discounts from more than 15 different colleges/universities. DHS employees have, or will have, access to training/career development courses by a variety of means: • DHS's Senior Executive Service Candidate Development Program (SES CDP), advertised both internally and externally to DHS; • DHS, in partnership with SkillSoft, offers nearly 40,000 online learning resources that can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are aligned to support competencies, job roles or blended learning offerings. • The DHS Leader Development Program establishes required and optional development activities throughout the year for new and seasoned leaders at all levels across DHS. DHS continues to use the Pathways Program, the Federal government's primary entrance point for students and recent graduates. In FY 2019, DHS hired 367 Pathways student interns, 216 recent graduates, and 10 Presidential Management Fellows, totaling 593 Pathways Program participants. Of these, 8.77 percent identified as PWDs and 1.18 percent were PWTDs. • The DHS Mentoring Program is a formal program that provides enriching experiences through reciprocal relationships and opportunities for personal and professional growth while sharing knowledge, leveraging skills, and cultivating talent. The DHS Mentoring Program is open to all DHS federal employees. The mentoring announcement is sent by the DHS Management Directorate to all DHS employees. Training is provided to mentor applicants. The types of mentoring offered include: Speed Mentoring, Flash Mentoring, Situational Mentoring, Reverse Mentoring, Group Mentoring, and Peer Mentoring. The program is evaluated with feedback provided on its successes and areas of improvement. The Mentoring Connection contract that coordinates the program has been extended. In FY 2019, the DHS Mentoring programs consisted of 497 mentees. Of the participants, 7.3 percent self-identified as having a disability and 3.9 percent self-identified as having a targeted disability.

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 (%)
Detail Programs						
Other Career Development Programs	500	44	3.19	2.2	1.8	0
Internship Programs		367		4.63		0.82
Coaching Programs						
Training Programs						
Fellowship Programs		216		4.17		1.85
Mentoring Programs		497		7.3		3.9

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

        a. Applicants (PWD)   Answer   N/A

        b. Selections (PWD)   Answer   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. DHS achieved full operational capability for its talent management system (referred to as the Performance and Learning Management System, or PALMS) at six of the nine DHS Components in August 2017. OCHCO exempted FEMA, TSA, and USCG from adopting PALMS. In FY 2019, DHS planned to identify the solution set for follow-on capability, including reporting capability such as that required for MD-715. • DHS completed its collection of training course completion data from all Components in November 2019. In FY 2020, DHS will begin using this data with other data sets to determine its ability to produce the MD-715 report. • DHS will continue to identify qualifying career development programs and courses that support those programs. Using data from its talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes, DHS will continue to produce a report that complies with MD-715. • DHS will continue to include encouraging language in all career development programs to increase the participation of PWDs.

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

        a. Applicants (PWTD)   Answer   N/A

        b. Selections (PWTD)   Answer   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 2019, AFD data were not available to conduct an analysis of the applicants and selections for development programs identified above by the required benchmarks. When comparing the number of selections for PWDs to the 12 percent goal and PWTDs to the 2 percent goal, neither group participated at rates expected in the programs outlined above.

C. AWARDS

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

        a. Awards, Bonuses, & Incentives (PWD)   Answer   Yes

b. Awards, Bonuses, & Incentives (PWTD) Answer Yes

Based on a review of MD-715 Table B9-1: Employee Recognition and Awards - Distribution by Disability, PWDs (IWDs) and PWTDs (IWTDs) are not receiving awards at the expected rates when compared to the corresponding inclusion rate of PWODs (self-reported as no disability). DHS-wide, data was provided for the following award categories: PWDs Benchmark Time-Off Awards 11 – 20 Hours: PWDs Inclusion Rate: 16.91% IWODs Inclusion Rate: 22.27% Cash awards $1 – $500: PWDs Inclusion Rate: 44.64% IWODs Inclusion Rate: 76.06% Cash awards $1,000 – $1,999: PWDs Inclusion Rate: 26.39% IWODs Inclusion Rate: 33.32% Cash awards $2,000 – $2,999: PWDs Inclusion Rate: 10.88% IWODs Inclusion Rate: 11.10% PWTDs Benchmark Time-Off Awards 11 – 20 Hours: PWTDs Inclusion Rate: 13.59% IWODs Inclusion Rate: 22.27% Time-Off Awards 21 – 30 Hours: PWTDs Inclusion Rate: 7.64% IWODs Inclusion Rate: 8.27% Cash awards $1 – $500: PWTDs Inclusion Rate: 60.43% IWODs Inclusion Rate: 76.06% Cash awards $1,000 – $1,999: PWTDs Inclusion Rate: 24.20% IWODs Inclusion Rate: 33.32% Performance Base Pay Increase: PWTDs Inclusion rate: 2.35% IWODs Inclusion Rate: 2.92%

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %

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

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

a. Pay Increases (PWD) Answer No

b. Pay Increases (PWTD) Answer Yes

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

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Performance Based Pay Increase	0	0.00	0.00	0.00	0.00

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

a. Other Types of Recognition (PWD) Answer N/A

b. Other Types of Recognition (PWTD) Answer N/A

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

D. PROMOTIONS

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

a. SES

i. Qualified Internal Applicants (PWD) Answer N/A

    ii. Internal Selections (PWD)   Answer   Yes

b. Grade GS-15

    i. Qualified Internal Applicants (PWD)   Answer   N/A

    ii. Internal Selections (PWD)   Answer   No

c. Grade GS-14

    i. Qualified Internal Applicants (PWD)   Answer   N/A

    ii. Internal Selections (PWD)   Answer   No

d. Grade GS-13

    i. Qualified Internal Applicants (PWD)   Answer   N/A

    ii. Internal Selections (PWD)   Answer   No

Aggregated relevant applicant pool data is not available at the Department level. Determination of relevant applicant pools should be considered at the Component level since positions and occupations are Component specific. An aggregation of relevant applicant pool data at the Department level would be less meaningful and potentially flawed. Qualified Internal Applicants by Senior Grade: Relevant Applicant Pool by Senior Grade: SES: 2.31% N/A GS-15: 3.85% N/A GS-14: 4.22% N/A GS-13: 3.84% N/A A trigger was identified for selections of PWDs at the SES level when comparing the participation rate of selections to the percentage of qualified internal applicants by senior grade levels. PWDs exceeded participation at all other senior grades as identified below: Selections by Senior Grade: Qualified Internal Applicants by Senior Grade: SES: 0.00% 2.31% GS-15: 5.45% 3.85% GS-14: 5.82% 4.22% GS-13: 6.28% 3.84%

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

    a. SES

        i. Qualified Internal Applicants (PWTD)   Answer   N/A

        ii. Internal Selections (PWTD)   Answer   Yes

    b. Grade GS-15

        i. Qualified Internal Applicants (PWTD)   Answer   N/A

        ii. Internal Selections (PWTD)   Answer   Yes

    c. Grade GS-14

        i. Qualified Internal Applicants (PWTD)   Answer   N/A

        ii. Internal Selections (PWTD)   Answer   Yes

    d. Grade GS-13

        i. Qualified Internal Applicants (PWTD)   Answer   N/A

        ii. Internal Selections (PWTD)   Answer   No

Aggregated relevant applicant pool data is not available at the Department level. Determination of relevant applicant pools should be considered at the Component level since positions and occupations are Component specific. An aggregation of relevant applicant pool data at the Department level would be less meaningful and potentially flawed. Qualified Internal Applicants by Senior Grade: Relevant Applicant Pool by Senior Grade: SES: 0.58% N/A GS-15: 1.75% N/A GS-14: 1.57% N/A GS-13: 1.86% N/A Triggers were identified for selections of PWTDs at the SES, GS -15, and GS-14 levels when comparing the participation rate of selections to the percentage of qualified internal applicants by senior grade levels. PWDs exceeded participation at the GS-13 level as identified below: Selections by Senior Grade: Qualified Internal Applicants by Senior Grade: SES: 0.00% 0.58% GS-15: 1.18% 1.75% GS-14: 1.39% 1.57% GS-13: 1.57% 1.86%

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

        a. New Hires to SES (PWD)   Answer   No

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

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

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

Based on a review of MD 715 B7-1 Senior Grade Level (New Hires), DHS did not have any triggers for new hires when compared to the qualified applicants in the senior grade levels SES through GS-13. Hires Qualified Applicant Pool New Hires to SES 7.69% 4.66% New Hires to GS-15 13.77% 5.40% New Hires to GS-14 11.41% 7.17% New Hires to GS-13 14.06% 7.50%

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

        a. New Hires to SES (PWTD)   Answer   No

        b. New Hires to GS-15 (PWTD)   Answer   Yes

        c. New Hires to GS-14 (PWTD)   Answer   Yes

        d. New Hires to GS-13 (PWTD)   Answer   Yes

Based on a review of MD 715 B7-1 Senior Grade Level (New Hires), DHS had triggers at the GS-15, GS-14, and GS-13 levels. No trigger was identified at the SES level, as the rate of hires exceeded the reported qualified applicant pool as provided below: Hires Qualified Applicant Pool New Hires to SES 2.56% 1.69% New Hires to GS-15 1.45% 2.49% New Hires to GS-14 1.71% 3.23% New Hires to GS-13 1.86% 3.58%

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

        a. Executives

          i. Qualified Internal Applicants (PWD)   Answer   N/A

          ii. Internal Selections (PWD)   Answer   Yes

        b. Managers

      i. Qualified Internal Applicants (PWD)   Answer   N/A

      ii. Internal Selections (PWD)   Answer   Yes

   c. Supervisors

      i. Qualified Internal Applicants (PWD)   Answer   N/A

      ii. Internal Selections (PWD)   Answer   Yes

Due to the limited availability of applicant flow data and relevant applicant data, DHS is unable to identify the participation rates by disability distribution for qualified internal applicants. When reviewing the internal selections and comparing to the 12 percent goal as an alternative comparator, triggers were identified for promotions to Managers (GS-13 – GS-14) and Supervisors (First-Level Grade 12 and Below positions. No trigger was identified for Executives (SES – GS-15) positions. PWD Executive Selections: 13.17% PWD Goal: 12.00% PWD Manager Selections: 9.96% PWD Goal: 12.00% PWD Supervisor Selections: 11.53% PWD Goal: 12.00%

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

   a. Executives

      i. Qualified Internal Applicants (PWTD)   Answer   N/A

      ii. Internal Selections (PWTD)   Answer   Yes

   b. Managers

      i. Qualified Internal Applicants (PWTD)   Answer   N/A

      ii. Internal Selections (PWTD)   Answer   Yes

   c. Supervisors

      i. Qualified Internal Applicants (PWTD)   Answer   N/A

      ii. Internal Selections (PWTD)   Answer   Yes

Due to the limited availability of applicant flow data and relevant applicant data, DHS is unable to identify the participation rates by disability distribution for qualified internal applicants. When reviewing the internal selections and comparing to the 12 percent goal as an alternative comparator, triggers were identified for promotions to Managers (GS-13 – GS-14) and Supervisors (First-Level Grade 12 and Below positions. No trigger was identified for Executives (SES – GS-15) positions. PWD Executive Selections: 13.17% PWD Goal: 12.00% PWD Manager Selections: 9.96% PWD Goal: 12.00% PWD Supervisor Selections: 11.53% PWD Goal: 12.00%

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

      a. New Hires for Executives (PWD)   Answer   No

      b. New Hires for Managers (PWD)   Answer   No

      c. New Hires for Supervisors (PWD)   Answer   Yes

Due to the limited availability of applicant flow data and relevant applicant data, DHS is unable to identify the participation rates by disability distribution for new hires. When reviewing the new hires and comparing to the 12 percent goal as an alternative comparator, a trigger was identified for Supervisors (First-Level Grade 12 and Below positions. No triggers were identified for Executives (SES – GS-15) and Managers (GS-13 – GS-14) positions. PWDs Executive Selections: 18.28% PWDs Regulatory Goal: 12.00% PWDs Manager Selections: 30.47% PWDs Regulatory Goal: 12.00% PWDs Supervisor Selections: 9.11% PWDs Regulatory Goal: 12.00%

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

a. New Hires for Executives (PWTD)	Answer	No
b. New Hires for Managers (PWTD)	Answer	No
c. New Hires for Supervisors (PWTD)	Answer	No

Due to the limited availability of applicant flow data and relevant applicant data, DHS is unable to identify the participation rates by disability distribution for new hires. When reviewing the new hires and comparing to the 2 percent goal as an alternative comparator, triggers were identified for Managers (GS-13 – GS-14) and Supervisors (First-Level Grade 12 and Below) positions. PWTDs are exceeding the 2 percent goal in Executive Selections (GS-15 – SES). PWTDs Executive Selections: 2.15% PWTDs Regulatory Goal: 2.00% PWTDs Manager Selections: 1.88% PWTDs Regulatory Goal: 2.00% PWTDs Supervisor Selections: 0.93% PWTDs Regulatory Goal: 2.00%

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

                                                                         Answer   No

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

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

a. Voluntary Separations (PWD)	Answer	Yes
b. Involuntary Separations (PWD)	Answer	Yes

Based on a review of MD-715 Table B1: Total Workforce (Employee Losses) - Distribution by Disability, PWDs are exceeding the inclusion rate benchmark for voluntary and involuntary separations. Voluntary Separations PWDs Inclusion Rate: 5.94% Benchmark IWODs Inclusion Rate: 5.61% Involuntary Separations PWDs Inclusion Rate: 3.13% Benchmark IWODs Inclusion Rate: 1.82%

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %

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

       a.Voluntary Separations (PWTD)   Answer   Yes

       b.Involuntary Separations (PWTD)   Answer   Yes

Based on a review of MD-715 Table B14: Separations by Type of Separation - Distribution by Disability, PWTDs are exceeding the inclusion rate benchmark for both voluntary and involuntary separations. Voluntary Separations PWTDs Inclusion Rate: 7.60% Benchmark IWODs Inclusion Rate: 5.61% Involuntary Separations PWTDs Inclusion Rate: 2.97% Benchmark IWODs Inclusion Rate: 1.82%

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %

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

During FY 2019, the Department Exit Survey program experienced a transitional period, involving coordination and consideration of both content and administration changes. TSA and USSS continued to maintain their separate Component-specific exit survey programs. Additional Components, including CBP and ICE, followed suit and transitioned separate exit surveys programs at the beginning of FY 2019. Components with separate exit survey programs, provide results with the Department for coordination and reporting purposes. Based on a consolidated review, aside from retirement, representing 226 respondents, the top reasons separating non-SES employees listed for leaving DHS were: • Personal/Work-Life • Management/Supervisor • Advancement Opportunities Based on available data from the DHS Exit Survey (not including TSA, USSS, CBP and ICE) the top three categories for employees self-reporting as an IWD, resulting in a total of 22 or 9.73 percent of respondents, the reasons for leaving differ slightly and include: • Health-related reasons • Personal or family-related • Advancement opportunities/geographic location/and management/supervisor Of the 22 respondents, excluding those who selected retirement as a primary factor for leaving, six self-reported as having a targeted disability. The primary reason, reported by two respondents, was also due to health-related reasons. The remaining respondents selected optional unique descriptions for leaving. DHS will continue to monitor these areas to identify any future trends. To assist in monitoring trends and possible triggers, DHS recommends that along with its decentralized exit survey program efforts, each Component conduct an individualized assessment to identify any correlation to potential barriers for separating PWDs/PWTDs.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

The DHS public facing website (https://www.dhs.gov/accessibility) notice explains that if an individual believes that the information and communication technology (ICT) used by the Department of Homeland Security does not comply with Section 508 of the Rehabilitation Act, they may file a 508 complaint by contacting Accessibility@hq.dhs.gov. Similarly, the DHS intranet site (http://dhsconnect.dhs.gov/pages/accessibility.aspx) provides the following statement: Accessibility The Department of Homeland Security is committed to providing accessible Information and Communication Technology (ICT) to individuals with disabilities, including members of the public and federal employees, by meeting or exceeding the requirements of Section 508 of the Rehabilitation Act of 1973. In addition, the Department is also committed to ensuring accessibility of our buildings and facilities as required by the Architectural Barriers Act, 42 U.S.C. 4151 through 4157. Section 508 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794d) Section 508 of the Rehabilitation Act of 1973, as amended requires agencies, during the procurement, development, maintenance, or use of ICT, to ensure that individuals with disabilities have access to and use of ICT information and

data comparable to the access and use afforded to individuals without disabilities (i.e., "ICT accessibility"), unless an undue burden would be imposed on the agency. More information on Section 508 and the technical standards can be found at www.section508.gov. If you have feedback, questions, or concerns relating to the accessibility of any content that interferes with your ability to access the information on the Department of Homeland Security's website, please contact Website Issues for assistance. If you believe that the Information and Communication Technology (ICT) used by the Department of Homeland Security does not comply with Section 508 of the Rehabilitation Act, you may file a 508 complaint by contacting Accessibility@hq.dhs.gov. To enable us to respond in a manner most helpful to you, please indicate the nature of your accessibility problem, the preferred format in which to receive the material, the web address (URL) of the material with which you are having difficulty, and your contact information. Additional information regarding compliance with 508 requirements is available at the DHS Office of Accessible Systems and Technology.

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

The DHS public facing website (https://www.dhs.gov/accessibility) notice explains that if an individual believes that a physical facility designed, built, altered, or leased with Federal funds by the Department of Homeland Security does not comply with the Architectural Barriers Act (ABA), refer to the US Access Board's website under ABA Enforcement – File a Complaint. Similarly, the DHS intranet site (http://dhsconnect.dhs.gov/pages/accessibility.aspx) provides the following statement: Architectural Barriers Act of 1968 (42 U.S.C. § 4151--57) The Architectural Barriers Act (ABA) requires access to facilities that are designed, built, altered, or leased with Federal funds. The Access Board is the federal agency responsible for enforcing the ABA. The Access Board's accessibility standards are available on their website at www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards, and information about filing a complaint may be found at www.access-board.gov/aba-enforcement/file-a-complaint.

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

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

C. REASONABLE ACCOMMODATION PROGRAM

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

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

During FY 2019, the overall average time frame for processing initial requests for reasonable accommodations was approximately 37.30 days (does not include average processing days for USCIS and FEMA). The average number of days reported by DHS Components for FY 2018 are as follows: CBP: 46.6 Days USCIS: Unavailable – see Component report HQ: 54 Days FEMA: Unavailable – see Component report ICE: 66.95 Days TSA: 45 Days USCG: 23.13 Days USSS: 6 Days

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

DHS is committed to providing effective reasonable accommodations to employees and applicants with disabilities. The overall average processing time for reasonable accommodation requests during FY 2019 was thirty-seven (37.30) days, reducing the average processing days by two. Note: The average number of processing days does not include USCIS and FEMA since their data

was unavailable at the time of reporting. During FY 2019, all DHS Components continued to provide reasonable accommodation training to managers and supervisors regularly. Consistent with the new requirements outline in EEOC's Final Rule implementing revisions to 29 C.F.R 1614. § 1614.203(d)(5) , DHS and its Components have been developing and implementing revised reasonable accommodation and personal assistance service procedures. In support of DHS's reasonable accommodation program, CRCL and Component level subject matter experts continue to collaborate with OAST on the development and overall architectural design of an enhanced Accessibility Compliance Management System, to monitor trends and to manage, track and report on all reasonable accommodation requests, including requests for PAS. DHS initially deployed the new system during FY 2019. As a result, coordinated efforts continue to address unexpected system issues and enhancements. The new system will have a built-in reporting capability to produce all reporting and record keeping requirements consistent with 29 C.F.R 1614. § 1614.203(d)(5) and Executive Order 13164. In observance of the 29th Anniversary of the Americans with Disabilities Act of 1990 (ADA), CRCL hosted a day long training session on "Answering ADA Workplace Questions." Over sixty managers, Human Capital and EEO professionals from all Components were invited and attended the instructive training focusing on practical tips, case law review, and checklists for effectively managing reasonable accommodation requests. This training was delivered by the Director of ADA Services, with the National Employment Law Institute. DHS developed the Employment of People with Disabilities: Roadmap to Success training in 2008, updated the materials in 2012, and more recently during FY 2017, to include the provision of the final rule implementing 29 C.F.R 1614. § 1614.203(d)(5). All supervisors, hiring officials and human capital professionals are required to complete the training within sixty (60) days of onboarding and every two years after appointment. All Components use the DHS training module. CRCL conducted efforts during FY 2019 and explored available options and resources to revise the training module during 2020. Coordination of updated training materials will be conducted and led by CRCL as a Department-wide effort with a goal of implementation by FY 2021. CRCL continued efforts to implement revised reasonable accommodation procedures to incorporate the provision of personal assistant services as an affirmative action obligation. The revised procedures are in the official DHS Directives System review process with a completion of the review and implementation expected by mid-year FY 2020. Finally, DHS continues to partner with the Department of Defense (DoD), Computer/Electronic Accommodation Program (CAP) and the Job Accommodation Network to provide assistive technology accommodation solutions and expert consulting on disability accommodation solutions. During FY 2019, CAP provided 368 accommodations to 134 employees and conducted needs assessments for 34 employees, totaling $120,394.30 in cost savings to DHS.

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

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

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

In FY 2017, DHS posted an updated notice to CRCL Connect Page, covering the requirement to provide personal assistance services (PAS). The language reads: Consistent with the EEOC's guidance until further notice, requests for Personal Assistance Service (PAS) will be processed under reasonable accommodations procedures. In addition, a link to the EEOC guidance on providing PAS was also added. This guidance is now posted to DHS's public facing webpage at the following URL: https://www.dhs.gov/reasonable-accommodations-dhs. In FY 2018, DHS drafted revisions to its existing Reasonable Accommodation procedures to include the provision of PAS. The initial draft was submitted to EEOC via the raprocedures@eeoc.gov mailbox on September 28, 2018, for review as required. DHS received feedback from the EEOC and incorporated recommendations. The revised procedures are in the official DHS Directives System review process with a completion of the review and implementation expected by mid-year FY 2020.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer   No

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

                                                                                    Answer   Yes

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

During FY 2019, DHS had a lower percentage of PWDs who filed a formal EEO Complaint (16.2 percent) alleging harassment, as compared to the government-wide average of 19.69 percent. In FY 2019, DHS had 39 settlement agreements and one finding alleging harassment, hostile work environment based on disability. A summary of the corrective measures taken are as follows: Finding # 1: 1. Post notice for 180 consecutive days. 2. Conduct EEO training on the Rehabilitation Act of 1973 for all managers/ supervisors. 3. Back pay. 4. Provide the opportunity to submit a request for attorney's fees. 5. Compensatory damages. 6. Revision of agency policies.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

                                                                                    Answer   No

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

                                                                                    Answer   Yes

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

During FY 2019, DHS had a lower percentage of PWDs who filed a formal EEO Complaint (9.50 percent) alleging failure to provide a reasonable accommodation compared to the government-wide average of 13.53 percent. DHS had 28 settlement agreements, a reduction of 20 agreements compared to FY 2018, and three findings alleging failure to provide a reasonable accommodation based on disability during FY 2019. A summary of the corrective measures taken are as follows: Finding # 1: 1. Post notice for 180 consecutive days. 2. Conduct eight hours of EEO training. 3. Consider disciplinary action against the supervisor. 4. Provide the opportunity to submit a request for attorney's fees. 5. Conduct research for a reassignment for which complainant qualifies. Finding #2: 1. Conduct two hours of EEO training. 2. Consider disciplinary action against the supervisor. 3. Provide the opportunity to submit a request for compensatory damages and attorney fees. 4. Post notice for 60 consecutive days. Finding #3: 1. Conduct eight hours of EEO training 2. Consider disciplinary action against the supervisor. 3. Provide the opportunity to submit a request for compensatory damages and attorney fees. 4. Post notice for 60 consecutive days.

Section VIII: Identification and Removal of Barriers

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

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

                                                                                    Answer   Yes

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

                                                                                    Answer   Yes

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments.
    The following Trigger plans (1 - 5) were copied from the DHS FY 19 EEOC Part J Plans for Persons with
    Disabilities, to ensure complete and accurate information not included in the FedSep AAP.   Page 18

Trigger 1	Lower than expected participation for individuals with disability (PWD) and targeted disabilities (PWTDs) when compared to the regulatory goals of 12 percent for PWD and 2 percent for PWTD in grade clusters GS-1 – GS-10 and GS-11 – SES.
Barrier(s)	Not Identified
Objective(s)	Increase workforce participation rates of PWDs and PWTDs at all grade levels.

Responsible Official(s)	Performance Standards Address the Plan? (Yes or No)
Laura Davis, CRCL Ginny Berry, OCHCO Cynthia Clinton-Brown OAST	Yes Yes N/A

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

Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	**Yes**	FY 2019 Update: B1 – Total Permanent Workforce (2.0 version) DHS experienced an increase of 1,479 employees from FY 2018 to FY 2019 for PWDs, representing 11.01 percent, a ratio increase of 0.55 percent, the highest of every group. PWTDs experienced a slight increase of 17 employees, however overall ratio decrease of -0.02 percent. Separation rates did not experience any significant changes. PWDs separated at a rate of 11.87 percent slightly above FY 2018, and PWTDs separated at the same rate of 1.58 percent as they did in FY 2018. -- FY 2018: B1 – Total Permanent Workforce: PWDs 10.46 percent below 12 percent Goal; Total Permanent Workforce PWTD 1.28 percent. B14 – Separations by Disability: PWDs Separating at rates (11.67 percent) higher than expected PWTDs Separating at rates (1.58 percent) higher than expected

Complaint Data (Trends)	**Yes**	**FY 2019 Update: See below Findings and Decisions**. 462 – (Part IV) Bases and Issues Alleged in Complaints Filed: Slight increase from 106 in FY 2017 to 118 in FY 2018 in total number of complaints alleging failure to accommodate resulting in a percent change of 11.32 percent. Increase from 164 in FY 2017 to 223 in FY 2018 in total number of complaints alleging harassment based on disability resulting in a percent change of 35.98 percent. No FEAR Act Report (as of 4th Qtr. FY 2018) – Complaints based on disability increased in the last six years from 10.23 percent of all complaints to 12.54 percent of all complaints in FY 2018. For the first time, trend data revealed that complaints filed on the basis of disability ranked as the fourth most common out of a twelve basis, since 2013. Considering complaints by issue, complaints based on "reasonable accommodation" ranked seventh out of thirty-one issues during FY 2018 as of 4th Qtr. FY 2018 compared to tenth in FY 2013. DHS is also monitoring complaints by issue for "medical examinations," which has also experienced a significant increase from eight in FY 2013 to 33 in FY 2018.
Grievance Data (Trends)		
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	**Yes**	**FY19 462 Report Update** – DHS had an overall decrease in the total number of settlements based on harassment when compared to FY 2018, from 63 to 39 during FY 2019. The number of findings remained unchanged with one finding in FY 2019. Similarly, the number of settlements based on failure to accommodate also decreased significantly, from 48 in FY 2018 to 28 during FY 2019. The number of findings

		increased by one, from two in FY 2018 to three in FY 2019. DHS continues to remain under the government-wide average for both types of complaints filed by PWDs. **462 Report FY18 –** DHS showed increases in the total number of settlements based on disability harassment and reasonable accommodation when compared to FY 2017.
Climate Assessment Survey (e.g., FEVS)	**No**	
Exit Interview Data	**Yes**	**FY19 Update DHS Exit Survey –** DHS (excludes TSA, USSS, CBP and ICE) Due to transition changes further decentralizing exit survey procedures, the department is recommending that Components continue to conduct individualized assessments to monitor trends. Based on data available, there was a slight deviation in the top three primary reasons for IWDs separating DHS, resulting in: 1. Health Reasons; 2. Personal or Family Related; and 3. Advancement Opportunities/Geographic Location/ and Supervisor/Management, all coming in 3rd. With the addition of "health reasons" for both groups, PWDs and PWTDs, DHS will continue to monitor, but suspects that it directly correlates to the high percentage of positions with medical and physical requirements. **DHS Exit Survey (excludes TSA and USSS)** 14.28 percent of respondents indicated they had a disability. Of these respondents the top three reasons for leaving include: Supervision/Management –11.63 percent Advancement Opportunities – 11.63 percent Personal/Family Related – 8.84 percent The top reasons mentioned above are the same as PWODs (IWODs). When comparing leaving based on health-related reasons, PWDs (PWDs) indicated health-related reasons as the primary reason 5.58 percent of the time compared to 1.82 percent for IWODs.

		Further review revealed a 4.18 percent response rate for employees indicating they had a targeted disability. Of the respondents who indicated they had a targeted disability, the top three reasons for leaving included: Advancement Opportunities – 11.11 percent Supervision/Management –11.11 percent Geographic Location and Salary Pay (tied) – 9.52 percent Health-related reasons were indicated by 6.35 percent of the PWTDs respondents.
Focus Groups	**No**	
Interviews	**No**	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	**No**	
Other (Please Describe)	**Yes**	**FY 2019 Update** - Utilization Analysis by Grade Cluster (Perm) DHS experienced an increase in both the GS-1- GS-10 and GS-11-SES Grade Clusters for PWDs as follows: PWDs Grade Cluster 1-10 8.99 percent (below 12 percent) PWDs Grade Cluster 11-SES 12.27 percent (above the 12 percent goal) Slight decreases were reported for PWTDs in both the GS-1- GS-10 and GS-11-SES PWTDs Grade Cluster 1-10 1.26 percent (below 2 percent) PWTDs Grade Cluster 11 – SES 1.26 percent (below 2 percent) -- Utilization Analysis by Grade Cluster (Perm) PWDs Grade Cluster 1-10 8.73 percent (below 12 percent) PWDs Grade Cluster 11-SES 11.55 percent (slightly below 12 percent) PWTDs Grade Cluster 1-10 1.29 percent (below 2 percent) PWTDs Grade Cluster 11 – SES 1.27 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 and socialize throughout DHS.	Yes		12/27/2017
09/30/2018	Update DHS Disability training module for managers and HR Professionals (Employment of People with Disability: A Roadmap to Success Training)	Yes	10/30/2020	
03/30/2018	Develop mid-year reporting requirements to monitor Component progress with implementing the revised rule on 29 C.F.R 1614. § 1614.203(d)(5).	Yes		3/08/2018
09/30/2018	Collaborate with OCHCO to revise DHS standard language on all vacancy announcements to encourage applicants with disabilities to apply, and to clearly explain Schedule A process and requesting reasonable accommodations.	Yes	09/30/2019	4/18/2019
09/30/2018	Revise Reasonable Accommodation procedures to include procedures for providing Personal Assistance Services.	Yes	06/30/2020	
09/30/2018	Develop and post notice of rights for employees and applicants under Section 508 of the Rehabilitation Act and the Architectural Barriers Act on the internal and external websites.	Yes		09/30/2018
03/30/2018	Implement and post Affirmative Action plan for Individuals with Disabilities to the DHS website internally and externally.	Yes	7/19/2018	07/19/2018
09/30/2020	Collaborate with OCHCO to explore the feasibility of considering disability status as a positive factor in hiring and promotions decisions to the extent permitted by law.	Yes	2/20/2020	
04/01/2019	Develop a bi-annual report to monitor Components progress toward increasing participation of PWDs and PWTDs within Mission Critical Occupations.	Yes	6/30/2020	
Fiscal Year	Accomplishments			
2017	N/A - Newly established.			
2018	**Hiring Goals:**			

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

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

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

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

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

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

	partnership with OCHCO will continue efforts to ensure effective implementation by the end of FY 2019. **Revise Reasonable Accommodation and Personal Assistance Services Procedures:** During FY 2018, CRCL drafted revised reasonable accommodation procedures to include procedures for processing personal assistance services consistent with the new obligations outlined in Section 501 of the Rehabilitation Act. As a result, DHS (Departmental), U.S. Coast Guard, the Transportation Security Administration, and U.S. Secret Service have all submitted either draft or final revised procedures to EEOC for review and approval pursuant to Executive Order 13164, during the reporting period. CRCL will continue to monitor and track the status and progress with the remaining Components in meeting this requirement. DHS's procedures require all updated reasonable accommodation procedures to be submitted to CRCL for review prior to submission to EEOC. **Develop and post notice of rights under Section 508 and the Architectural Barriers Act on the internal and external websites.** During FY 2018, DHS updated its web page, e.g., internal connect page (http://dhsconnect.dhs.gov/pages/accessibility.aspx), for both accessibility and consistency to include a description of rights and how to file a complaint under Section 508. **Implement and post FY 2017 Affirmative Action Report and FY 2018 Plan** As required, DHS posted its FY 2017 Affirmative Action Report and FY 2018 Plan on DHS' public facing website at the following location: www.dhs.gov/reports-office-civil-rights-and-civil-liberties. CRCL continues to collaborate with OCHCO and DHS Components to ensure effective implementation on a regular basis.
2019	**Disability Training**: DHS continued its efforts to redevelop and expand its *DHS Roadmap to Success* training module. Modifications to the training include recent changes in disability employment law, Section 508 compliance and the addition of Personal Assistance Services as a regulatory requirement in Title 29, Part 1614. CRCL developed and submitted a statement of objectives to support a request for proposal to OPM's USALearning office. Based on the feedback received from OPM including the total estimated cost to redesign the training, CRCL decided to explore other options. As a result, CRCL consulted with OCHCO's Strategic Learning Development and Engagement's (SLDE) Learning Technology and Innovation (LTI) Division. DHS is certain that the services provided in-house by the SLDE-LTI will support CRCL's training development and implementation needs. The goal remains to deploy the revised *DHS Roadmap to Success* module before the end of FY 2020 with a roll-out in early FY 2021.

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

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

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

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

Nothing to report.

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

To be determined.

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

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

Trigger 2	Individuals with disabilities and targeted disabilities are receiving recognition and awards at rates lower than expected when compared to individuals without disabilities.	
Barrier(s)	Not Identified.	
Objective(s)	Collaborate with OCHCO to review recognition and awards policy, practices and procedures, and determine next steps.	
Responsible Official(s)	**Performance Standards Address the Plan? (Yes or No)**	
CRCL OCHCO		
Barrier Analysis Process Completed? (Yes or No)	**Barrier(s) Identified? (Yes or No)**	
No	**No**	

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

Processes)		
Climate Assessment Survey (e.g., FEVS)	Yes	FY 2019 Update: Upon review of the FY 2019 FEVS, DHS has seen positive progress. FY 2019 data reveals the largest variance between PWDs (56.3 percent positive, up from 53.9 percent in FY 2018) and IWODs (65.4 percent positive, up from 63.7 percent in FY 2018) is -9.1 percent (down from -9.7 percent in FY 2018), for Question 38 (Agency) - Prohibited Personnel Practices (for example, illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated. Further review of survey responses revealed a -0.70 percent variance (was -2 percent variance in FY 2018) for PWDs (39.7 percent positive, up from 37.2 percent in FY 2018) compared to IWODs (40.40 percent positive, up from 39.2 percent in FY 2018) for Question 25 – Awards in my work unit depend on how well employees perform their jobs. --- Upon review of the FY 2018 FEVS, the largest variance between PWDs (53.9 percent positive) and IWODs (63.7 percent) is -9.7 percent, for Question 38 (Agency) - Prohibited Personnel Practices (for example, illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated. Further review of survey responses revealed a -2 percent variance for PWDs (37.2 percent positive) compared to IWODs (39.2 percent positive) for Q 25 – Awards in my work unit depend on how well employees perform their jobs.
Exit Interview Data	Yes	Upon review of the Exit Survey, the reason for leaving associated with "bonus" was reported by 18 employees or 1.20 percent of all respondents. Of those responses, only one respondent, self-identified as having a disability.
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO,	No	

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
OPM)				
Other (Please Describe)	N/A			
09/30/2018	Collaborate with OCHCO to review recognition and awards policy, practices and procedures, and determine next steps.	Yes	09/30/2020	

Fiscal Year	Accomplishments
2017	N/A - Newly established.
2018	During FY 2018 CRCL identified initial data sources and policies and procedures at the departmental level to begin review. As indicated above, data sources reviewed include workforce data tables, complaint data, Federal Employment Viewpoint Survey responses, and the DHS Exit Interview Survey report. The following DHS Directives and Instructions have been identified for further review in coordination with OCHCO during FY 2019: 255-02 Employee Recognition 255-02-001 Instruction guide on Employee Recognition 255-03-001-01 Time-Off Awards 255-01 Honorary Awards 255-01-001 Instruction guide on Honorary Awards 255-12 Approval of Monetary Awards over $6,000
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 Directives Manager is responsible for affirmatively indicating to the DHS Directives Manager what appropriate action is necessary to maintain the Directive or Instruction upon receipt of the notice from the DHS Directives Manager, which is coordinated every two-years. Based on this outlining procedure, all policies and procedures identified are reviewed every two years by the Office of the Chief Human Capital Officer. To date, no potential barriers have been identified. CRCL will continue to coordinate and collaborate with OCHCO on a regular basis to propose recommendations to ensure perceived or actual barriers that may be caused by DHS award policies or associated procedures are addressed.

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

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

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

To be determined.

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

DHS has modified the target date for completion to 09/30/2020.

Trigger 3	Unavailability of applicant flow data by disability distribution to effectively analyze percentage of qualified applicants for career development opportunities, promotions and new hires. Limited access to Applicant Flow data using current systems (USAStaffing/Cognos, Monster Government Solutions, and Learning Management Systems).
Barrier(s)	
Objective(s)	Acquire accurate and reliable applicant flow data to analyze, monitor and inform program enhancements to increase representation of PWDs and PWTDs in all programs and hires.

Responsible Official(s)	Performance Standards Address the Plan? (Yes or No)
CRCL OCHCO SRDI OCHCO Reports and Analysis (need to identify names of Officials)	

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

Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	No	DHS manually combines applicant flow data for promotions and new hires from USAStaffing/Cognos and Monster Government Solutions. DHS hopes to automate this process in the future. DHS is working to integrate or create the capability to enrich Leaning Management System data with disability data in the

			future. In FY 2018, data was manually obtained for the SES CDP and mentoring programs.	
Complaint Data (Trends)		No		
Grievance Data (Trends)		No		
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)		No		
Climate Assessment Survey (e.g., FEVS)		No		
Exit Interview Data		No		
Focus Groups		No		
Interviews		No		
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)		No		
Other (Please Describe)		No		

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	CRCL and OCHCO will work with OPM and Monster Government Solutions to modify data collection and reporting capabilities to match MD-715 data reporting requirements.	Yes		
09/30/2019	Coordinate with OCHCO to develop AFD framework for the SES Career Development Program, Pathways Program, and mentoring programs at the DHS level.	Yes	09/30/2020	

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

	In FY 2018, DHS reported participation and applicant flow counts and percentages for the SES Career Development Program, which is the only program managed at the Department level that leads to promotion without further competition. The SES Career Development Program was announced in USAJobs. USAStaffing was used to track applications, qualification, referral, and selection. The Department was able to obtain full applicant flow data for the SES CDP cohort announced in FY 2018. The SES CDP program staff provided data on participants.

DHS will identify qualifying career development programs throughout the Department and the courses that support those programs. Using data from our talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes, DHS will produce a report that complies with MD-715.

DHS achieved full operational capability for PALMS at six of the nine DHS Components, in August 2017. OCHCO exempted FEMA, TSA, and USCG from adopting PALMS. In FY 2019, DHS plans to identify the solution set for follow-on capability, including reporting capability, such as that required for MD-715.

CRCL is working with OCHCO IT to obtain training and developmental opportunity participant data by diversity categories from PALMS and the central data warehouse. These systems are under development with diversity data added when feasible. Until the diversity data is available directly from PALMS and the central data warehouse, CRCL will continue to work with OCHCO to extract and manually determine the diversity status of developmental program participants. |
| FY 2019 | **Develop AFD framework for the SES Career Development Program, Pathways Program, and mentoring program.**
During FY 2019, CRCL was able to acquire applicant flow data for both the SES Career Development Program and the newly established DHS Women in Law Enforcement Mentoring Program and will continue to monitor. Efforts to identify a process for acquiring and analyzing DHS Pathways Program AFD are still in progress. AFD for these programs are now available for review on data tables B7 and B8. |

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

> Planned activities proceeding on schedule.

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

> No planned activities have been completed; proceeding on schedule.

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

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

Trigger 4	Lower than expected conversion rates of eligible Schedule A employees into competitive service.
Barrier(s)	
Objective(s)	Increase conversion rates of eligible Schedule A employees.

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

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

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

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2018	Review and analyze current policies and procedures for excepted service appointments.	Yes	09/30/2018	

01/30/2018	Monitoring Schedule A Conversions on a quarterly basis.	Yes		12/12/2018
09/30/2018	Coordinate efforts with OCHCO to develop DHS Schedule A guidance.	Yes	09/30/2020	

Fiscal Year	Accomplishments

	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
	  ○ Conversions to career or career conditional after 24 months
	  ○ Conversions to career or career conditional before 24 months
	  ○ Conversion Other
	  ○ Separated before conversion
	 • Total Separations
	 • Eligible not Converted
	 • No Longer Eligible at end of FY 2018 *(but was eligible at some point in the given year)*
	 • Not Eligible for Conversion
	
	 CRCL shares updated summary reports with all Components through the Disability Employment Advisory Council, which includes Component level Disability Program Managers and Selective Placement Program Coordinators. Upon request, CRCL provides detailed reports to support follow-up actions at the Component level as appropriate.
	
	 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 best practices. As a result, SRDI has drafted a proposed standard operating procedure which is currently in the review process.

FY19	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 ○ Conversions to career or career conditional after 24 months ○ Conversions to career or career conditional before 24 months ○ Conversion Other ○ Separated before conversion • Total Separations • Eligible not Converted • No Longer Eligible at end of FY 2018 (but was eligible at some point in the given year) • Not Eligible for Conversion **Coordinate efforts with OCHCO to develop DHS Schedule guidance.** Modified planned activity description to change efforts from developing policy and procedures to developing Schedule A guidance and to update target date for completion until 9/30/2020. CRCL and OCHCO are continuing these efforts to implement guidance with sound strategies and best practices for utilizing the Schedule A appointment authority for employment, retention, and career development opportunities. DHS plans to socialize and implement the final guidance by 2021. In support of this effort, CRCL developed a DHS Schedule A Factsheet. The factsheet is a high-level overview of the Schedule A Hiring Authority and provides prospective candidates with disabilities with an overview on applying for positions within DHS utilizing Schedule A, as well as a list of DHS Selective Placement Program Coordinators. Additionally, during FY 2019, DHS hosted a webinar on recruiting and hiring individuals with disabilities and targeted disabilities on Tuesday, July 30, 2019. Over 30 supervisors, hiring managers, recruiters, and human resources specialists participated to increase awareness of this topic. A post-webinar survey indicated 81 percent of the participants said they increased knowledge of Schedule A direct hiring authority from (34 percent prior to the webinar) and 58 percent of participants indicated they increased knowledge of the Bender program (17 percent prior to the webinar).

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

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

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

> To be determined.

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

> DHS has modified the target date for completion to 09/30/2020.

Trigger 5	Higher than expected separation rates for individuals with disabilities.
Barrier(s)	
Objective(s)	Increase retention rates of individuals with disabilities and targeted disabilities.

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

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

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

| | | increase from 106 in FY 2017 to 118 in FY 2018 in total number of complaints alleging failure to accommodate resulting in a percent change of 11.32 percent.

Increase from 164 in FY 2017 to 223 in FY 2018 in total number of complaints alleging harassment based on disability resulting in a percent change of 35.98 percent.

No FEAR Act Report (as of 4th Qtr. FY 2018) – Complaints based on disability increased in the last six years from 10.23 percent of all complaints to 12.54 percent of all complaints in FY 2018. Trend data revealed for the first time, complaints filed on the basis of disability rose from fifth to forth ranking out of twelve bases, since 2013.

Complaints by issue, reveals complaints based on "reasonable accommodation" ranked seventh out of thirty-one issues during FY 2018 as of 4th Qtr. FY 2018 compared to tenth in FY 2013.

DHS is also monitoring complaints by issue for "medical examinations," which has also experienced a significant increase from eight in FY 2013 to 33 in FY 2018. |
|---|---|---|
| Grievance Data (Trends) | No | |
| Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes) | No | |
| Climate Assessment Survey (e.g., FEVS) | Yes | FY 2019 Update: DHS reported 11.5 percent were respondents who reported to have a disability during the 2019 FEVS (less than the 12 percent goal of PWDs).

Further review of three questions used in the Best Places to Work report based on the FY 2019 FEVS, indicates an employee's intent to remain with an agency, reveals PWDs responded more favorably to two of the questions when compared to Individuals without disabilities. See following summary: |

Item	Item Text	Gov	DHS	Non-PWDs	PWDs	Diff
Q. 40	I recommend my organization as a good place to work.	67.2%	56.3%	56.3%	56.8%	0.5%
Q. 69	Considering everything, how satisfied are you with your job?	68.9%	60.6%	60.8%	59.1%	-1.7%
Q. 71	Considering everything, how satisfied are you with your organization?	61.4%	51.3%	51.3%	51.4%	0.1%

| | | ------------------------------ |
| | | DHS reported 8,648 out of 68,780 or 12.57 percent were respondents who reported to have a disability during the 2018 FEVS (more than the 12 percent goal of PWDs). |

The largest variance between PWDs (53.9 percent positive) and persons without disabilities (63.7 percent) is -9.7 percent, for Q. 38 (Agency) - Prohibited Personnel Practices (for example, illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated. Satisfaction with training received (Q. 68) had the second highest variance of -6.5 percent, and Opportunity to demonstrate leadership skills (Q. 43) had the third highest variance of -6.1 percent when compared to employees without disabilities.

Further review of three questions used in the Best Places to Work report based on the FY 2018 FEVS, indicates an employee's intent to remain with an agency, reveals PWDs responded less favorably (combined difference of -6.2 percent) when compared to Individuals without disabilities. See following summary:

Item	Item Text	Gov	DHS	Non-PWDs	PWDs	Diff
Q. 40	I recommend my organization as a good place to work.	66.3%	56.3%	**56.9%**	**54.8%**	**-2.1%**
Q. 69	Considering everything, how satisfied are you with your job?	68.3%	60.4%	**61.1%**	**58.0%**	**-3.1%**
Q. 71	Considering everything, how satisfied are you with your organization?	60.4%	50.6%	**51.2%**	**50.1%**	**-1.0%**

Exit Interview Data	No	See update under accomplishments.
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	No	

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

01/30/2018	Review and analyze exit surveys to identify barriers to retention.	Yes	1/30/2021	
01/30/2018	Monitor separations on a quarterly basis by disability distribution.	Yes		10/16/2018
06/30/2018	Collaborate with OCHCO to explore the feasibility of implementing new retention programs specifically for PWDs and PWTDs.	Yes	09/30/2020	
09/14/2018	Conduct study on reasonable accommodation requests and procedures for delayed and denied accommodations to identify potential correlations to high separations.	Yes	09/30/2020	
Fiscal Year	**Accomplishments**			
	Upon review PWDs continue to separate voluntarily and involuntarily at a higher rate when compared to employees without disabilities. The overall percentage of separations for PWDs increased from 10.05 percent in FY 2017 to 11.67 percent in FY 2018. Similarly, PWTDs experienced an increase for involuntary separations from 1.36 percent in FY 2017 to 2.11 percent in FY 2018, while voluntary separations for PWTDs decreased from 1.62 percent in FY 2017 to 1.51 percent in FY 2018. **Review and analyze exit surveys to identify barriers to retention**. CRCL reviewed and analyzed data from the FY 2018 exit survey. Data revealed approximately 18 percent of all employees voluntarily separating indicated their primary reason for leaving resulting in 1,506 responses. Of those responses, 215 or 14.2 percent of the respondents reported having a disability. Of the respondents who indicated they had a disability, the top three reasons for leaving other than Retirement, Moving to Another DHS Component, or Other were the same for respondents without disabilities, including: Supervision/Management – 11.63 percent Advancement Opportunities – 11.63 percent Personal/Family Related – 8.84 percent CRCL also noted, when comparing leaving based on health-related reasons, respondents with disabilities indicated health-related reasons as the primary reason 5.58 percent of the time compared to 1.82 percent for respondents without disabilities. In September 2018, DHS OCHCO convened an exit survey working group due to the low participation rates overall. The working group led by the DHS Engagement Team Lead, Chief Learning and Engagement Office, OCHCO consists of representatives from all DHS Components including representatives from CRCL. The initial goal of the working group was to review current DHS Exit Survey and Component Exit Surveys and provide recommended changes to the DHS			

survey that will improve participation and usefulness of data. The working group was tasked to also review off-boarding practices related to the exit survey in order to determine best practices for improving participation. CRCL representatives will ensure consideration of disability-related questions and seek their inclusion in the final submission of established core questions. The working group plans to achieve the goals outlined above and begin implementation by April 2019.

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

Monitor separations on a quarterly basis by disability distribution.
CRCL developed a quarterly dashboard to monitor workforce demographics including separations by disability. CRCL will continue to monitor separations on a quarterly basis as a standard practice.

Explore feasibility of implementing new retention programs specifically for PWDs and PWTDs.
CRCL through coordinated efforts with OCHCO/SRDI will continue to identify strategies for increasing participation of employees with disabilities in existing DHS mentoring programs and career development programs. During FY 2018, CRCL requested that all Components advertise and encourage individuals with disabilities to consider applying to the DHS Headquarters Mentoring program and all other career development programs already in place throughout the Department to support our affirmative employment obligations.

| FY 2019 | **Review and analyze exit surveys to identify barriers to retention.** |

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

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

	Strongly Disagree	*Disagree*	*Neither Agree or Disagree*	*Agree*	*Strongly Agree*
Recruitment					
Hiring					
Advancement					
Retention					

Followed by an optional open-ended comment box

2. **DHS takes appropriate steps to ensure accessibility (technology and facility) requirements are met for qualified individuals with disabilities.**
   Matrix scale:

	Strongly Disagree	*Disagree*	*Neither Agree or Disagree*	*Agree*	*Strongly Agree*
Technology					
Facility					

Followed by an optional open-ended comment box

3. DHS takes appropriate steps to ensure reasonable accommodation and/or Personal Assistance Services are provided to qualified individuals with disabilities.

	Strongly Disagree	*Disagree*	*Neither Agree or Disagree*	*Agree*	*Strongly Agree*
Reasonable Accommodations					
Personal Assistance Services					

Followed by an optional open-ended comment box

Explore feasibility of implementing new retention programs specifically for PWDs and PWTDs.
CRCL developed a plan to implement a DHS Disability Mentoring Program. Current plans are to implement a six-month program pilot during FY 2020, that will be modeled upon the CRCL DHS Women in Law Enforcement Mentoring Program launched in 2019.

CRCL continues to promote the DHS Headquarters Mentoring program and all other career development programs including the recently launched Supervisory Leadership Bridges Self Development Program, which is open to employees with a minimum of one-year employment in DHS and who are in the GS-11 – GS-13 grade levels in the 1801, 1811, 0132, 0301, 0343, and 2210 occupational series. This program is an innovative approach to providing employees across the Department with a flexible developmental path that targets important aspects of supervisory leadership. This program addresses a curated set of essential leadership competencies and integrates virtual learning resources and experiential developmental activities to support affirmative employment obligations.

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