

Management Directive 715
FY 2024 Status Report and FY 2025 Plan



Washington Headquarters Services
4800 Mark Center Drive, Alexandria, VA 22350-3400

**EQUAL EMPLOYMENT OPPORTUNITY COMMISSION (EEOC)
MANAGEMENT DIRECTIVE 715:
FEDERAL AGENCY ANNUAL EQUAL EMPLOYMENT OPPORTUNITY (EEO)
PROGRAM STATUS REPORT**

Washington Headquarters Services (WHS) and WHS-serviced Components

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EEOC FORM 715-01 PART A - D	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT
For period covering October 1, 2023, to September 30, 2024 ¹	

Part A – Department or Agency Identifying Information

Agency	Second Level Component	Address	City	State	Zip Code	Agency Code	FIPS Code
WHS		4800 Mark Center Drive	Alexandria	VA	22350	DD21	8840

Part B – Total Employment

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	6,512	1,739	8,251

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

Agency Leadership	Name	Title
Head of Agency	Regina F. Meiners	Director, WHS
Head of Agency Designee	N/A	N/A

¹ This FY 2024 Management Directive-715 report is a regulatory compliance report from the Equal Employment Opportunity Commission (EEOC), and the reporting period is prior to the Presidential Memorandum and Executive Order.

Part C.2 – Agency Official(s) Responsible for Oversight of EEOP(s)

EEOP Staff	Name	Title	Series	Pay Plan and Grade	Phone Number	Email Address
Principal EEO Director/Official	Pamela R. Sullivan	EEOP Director	0260	GS-15	571-372-0838	pamela.r.sullivan2.civ@mail.mil
Affirmative Employment Program (AEP) Manager²	James A. Parker	Chief, AEP and Alternative Dispute Resolution (ADR)	0260	GS-14	571-372-0844	james.a.parker290.civ@mail.mil
Complaint Processing Program Manager (PM)	Patrick Anderson	Chief, Complaints and Adjudication	0260	GS-14	571-372-0839	patrick.anderson8.civ@mail.mil
Disability PM	Tara D. Bennett-Howard	Disability PM	0201	GS-13	571-645-9804	tara.d.bennett-howard.civ@mail.mil
Special Placement Program Coordinator (Individuals with Disabilities (IwDs))	Marie V. Palisoc	Special Employment Program (SEP) Branch, Supervisor	0201	GS-14	571-372-4092	marie.v.palisoc.civ@mail.mil
Reasonable Accommodation (RA) PM (RAPM)	Tara D. Bennett-Howard	RAPM	0201	GS-13	571-645-9804	tara.d.bennett-howard.civ@mail.mil
Anti-Harassment Program (AHP) Manager	Adria N. Bullock	Acting AHP Manager	0343	GS-13	571-314-5497	adria.n.bullock.civ@mail.mil
Alternative Dispute Resolution (ADR) PM	James A. Parker	ADR PM	0260	GS-14	571-372-0844	james.a.parker290.civ@mail.mil
Compliance Manager	Patrick Anderson	Compliance Manager	0260	GS-14	571-372-0839	patrick.anderson8.civ@mail.mil
Principal MD-715 Preparer	Denise A. Lewis	EEO Specialist	0260	GS-13	571-372-0846	denise.a.lewis12.civ@mail.mil

² The position oversees regulatory and statutory functions, such as demographics, reporting, data collection, barrier analysis, etc. It should not be confused with Affirmative Action and is in compliance with the recent Presidential Memorandum and Executive Order.

Part D.1 – List of Subordinate Components Covered in this Report. Please identify the subordinate components within the agency (e.g., bureaus, regions).

Subordinate Component	City	State	Agency Code	FIPS Codes
Office of the Secretary of Defense (OSD)	Arlington	VA	DD01	8840
Office of the Chairman of the Joint Chiefs of Staff (OCJCS) and the Joint Staff (JS)	Arlington	VA	DD02	8840
U.S. Court of Appeals for the Armed Forces (USCAAF)	Arlington	VA	DD08	8840
Defense Advanced Research Project Agency (DARPA)	Arlington	VA	DD13	8840
WHS	Alexandria	VA	DD21	8840
Office of Local Defense Community Cooperation (OLDCC)	Arlington	VA	DD23	8840
Defense Legal Services Agency (DLSA)	Arlington	VA	DD25	8840
Defense Technology Security Administration (DTSA)	Arlington	VA	DD29	8840
Defense POW/MIA Accounting Agency (DPAA)	Arlington	VA	DD53	8840
Pentagon Force Protection Agency (PFPA)	Arlington	VA	DD65	8840
Defense Test Resources Management Center (DTRMC)	Arlington	VA	DD68	8840
Defense Acquisition University (DAU)	Alexandria	VA	DD81	8840
Armed Forces Retirement Home (AFRH)	Washington	DC	RH00	8840

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

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

Did the agency submit the following mandatory documents?	Please respond YES or NO	Comments
Organizational Chart	YES	
EEO Policy Statement	YES	
Strategic Plan	YES	
Anti-Harassment Policy and Procedures	YES	
RA Procedures	YES	
Personal Assistance Services Procedures	YES	

Alternative Dispute Resolution Procedures	YES	
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In the table below, the agency may decide whether to submit these documents with its MD-715 Report.

Did the agency submit the following optional documents?	Please respond YES or NO	Comments
Federal Equal Opportunity Recruitment Program Report	YES	
Disabled Veterans Affirmative Action Program Report	YES	
Operational Plan for Increasing Employment of Individuals with Disabilities under Executive Order 13548	NO	Exceeded the requirements
Human Capital Strategic Plan	NO	
EEO Strategic Plan	NO	Plan under revision - FY 2025 Goal
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	YES	

EEOC FORM 715-01 PART E	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
WHS DoD	For period covering October 1, 2023, to September 30, 2024	
EXECUTIVE SUMMARY		
Part E.1 – Executive Summary: Mission		
<p>AGENCY MISSION</p> <p>WHS is the essential services provider for OSD, Joint Staff, select Defense Agencies/DoD Field Activities, and other DoD offices in the National Capital Region. WHS provides a wide range of centralized capabilities to DoD headquarters, OSD, and DoD components, enabling economies of scale to deliver essential administrative services to fulfill the mission of the Department. WHS is under the authority, direction, and control of the Performance Improvement Officer and Director of Administration and Management.</p> <p>WHS services are organized into several directorates and specialty offices. These teams support the mission of our DoD customers by managing DoD-wide Programs and operations for the Pentagon Reservation (Pentagon, Mark Center, and Raven Rock Mountain Complex) and DoD-leased facilities in the National Capital Region. The WHS vision is to remain a creative, results-driven capabilities provider, recognized for excellence: responsible, reliable, resourceful, and relevant.</p> <p>WHS delivers essential administrative services to assist these components and offices in fulfilling the DoD’s mission. Under Director, Regina F. Meiners’ leadership, WHS supports establishing a model EEO Program, as required by the U.S. EEOC, under MD-715. This Report covers WHS, and WHS-served Components.</p> <p>EEO PROGRAM MISSION</p> <p>The mission of the Office of EEOP is to foster a respectful workplace environment that allows all personnel to succeed as they support the defense of our Nation.</p> <p>EEOP is responsible for implementing the Civilian EEO process, information, and referral services for the Military Equal Opportunity process, AEP, ADR Program, and Engagement initiatives. The staff comprises of an EEOP Director, 2 Branch Chiefs, 12 EEO Specialists, and 1 EEO Assistant.</p>		

Part E.2 – Executive Summary: Essential Element 1 – 6

MAJOR ACTIVITIES AND ACCOMPLISHMENTS³

The following six essential elements of a Model EEO Program compose the Agency's EEO Program and several noteworthy accomplishments in FY 2024.

ELEMENT 1: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP:

EEO Policies and Procedures Communicated to the Workforce: The WHS disseminated five Agency-wide EEO policy statements during EEO and Engagement training: EEO and Engagement, Prevention of Harassment, Employment and Retention of People with Disabilities, Federal Employee Anti-discrimination, and Retaliation Act (No FEAR Act), and ADR. These policies were reissued and distributed to the workforce during EEO, Anti-Harassment, and Engagement Training. DARPA disseminated EEO policy statements and posted them on the Agency Portal: Equal Opportunity Policy Statement, Federal Workplace Violence Prevention and Response Program Policy Statement, and Harassment Prevention Policy Statement. In addition, each new employee receives training on appropriate conduct in the workplace.

Awards Program: WHS received the 2024 Component Awards for outstanding contribution to the Workforce Recruitment Program (WRP). WHS Awards Programs portfolio contains a recognition award given to an employee demonstrating superior accomplishments in EEO or Engagement. The award recognizes employees for the merit of their service to mission and requirements.

PFPA Mentoring Program: In FY 2024, the PFPA Chief of Staff spearheaded and facilitated a transformative 6-month coaching and mentoring initiative. From the overwhelming response, 60 employees were selected to participate in 2 cohort sessions. This pilot Program, designed to foster professional growth and personal development, featured monthly 1-hour sessions. Utilizing the Gallup StrengthsFinder assessment, participants received tailored coaching, including personalized one-on-one sessions. The success of this initiative has paved the way for its integration into a comprehensive, Agency-wide mentoring and Coaching Program.

Leadership in Police Organizations (LPO) and the International Association of Chiefs of Police presents an intensive 3-week LPO course that explores leadership at different organizational levels: leading individuals, leading groups, and leading organizations. The course teaches students about these levels of leadership using applied learning, theory translation into practice, and practical leadership strategies. Students met in person 1 week per month for 3 consecutive months. Acceptance into this Program was competitive based, and 20 employees attended in FY 2024.

ELEMENT 2. INTEGRATION INTO AGENCY'S STRATEGIC MISSION:

EEO Director Involvement: The WHS EEOP Director reports directly to the WHS Director; she meets weekly and advises the WHS Director and senior leaders on strategies that promote an environment free of discrimination. The EEOP Director attended weekly WHS Leadership Staff Meetings and kept members

³ The accomplishments and initiatives were based upon the prior Directives of EEOC. Going forward, the President's Executive Order will be adhered to.

apprised of EEO trends, progress, and concerns. Additionally, the EEOP Director participated in various forums such as: the Human Resource Directorate (HRD) Customer Focus Forum, Senior Administrative Officer Forum, and the WHS Quarterly Facility Access Task Force, creating close working relationships within the Agency. The EEOP Director also attended the Mark Center Building Council meetings to maintain awareness of facilities' logistics related to architectural barriers.

State of the Agency Brief: The WHS EEOP Director, Chief, AEP/ADR, and MD-715 Program Manager presented the annual State of the Agency briefing to the WHS Director and senior officials. The presentation provided an overall assessment of the Agency's performance from the 6 essential elements and EEOP FY 2024 Women's Working Group (WWG)⁴ initiative to gain leadership buy-in and support.

Exit Survey Questions Revision: In FY 2024, 741 employees were separated from the Agency, and 173 surveys were completed, representing a 23% response rate. Twenty-four percent of survey respondents were promoters who would recommend their organization to others as a place to work. **Stay Interview:** In June 2024, WHS/HRD released a Stay Interview guide and corresponding iCompass training. The Stay Interview is essential for strengthening communication between supervisors and employees to understand why employees are leaving the organization. It enables organizations to receive timely feedback on what policy, process, and workplace changes may improve the employee experience, resulting in increased organizational performance and employee retention.

The following are Recruitment and Outreach accomplishments from WHS and WHS-serviced Components:

- **WHS/HRD** participated in the Defense Civilian Personnel Advisory Services Virtual Career Fair for recent graduates or candidates who learned of employment opportunities, internship programs, and an opportunity to register for OSD Hiring Event. The virtual event attracted over 1,895 candidates. Thirty-five participating DoD components and Military Departments attended the event.
- HRD attended a recruiting event sponsored by the Veterans Affairs Employment Commission and Germanna College. The recruiting event focused on vocational and wage-grade talent pools.
- HRD supported the Facilities Services Directorate at the Society of American Military Engineers Conference, obtaining several engineer leads and collaborating on pipeline deployment. HRD connected with the National Center for Construction Education and Research (NCCER) to further enhance the engineering talent pipeline, using NCCER's "Hard Hat Heroes" and Build Your Future Programs to assist Veterans in transitioning to the construction workforce.
- HRD participated in the Pentagon's annual Bring Your Child to Work Day. HRD met with over 100 civilians, military, and aspiring young individuals to share the WHS mission and job opportunities. Over 60% were interested in internship opportunities.
- HRD hosted an information session at American University to share DoD and WHS job opportunities.
- HRD attended the Deaf Nation Expo to provide general employment opportunities and seek American Sign Language interpreters.
- **DARPA** continued during FY 2024 to utilize and expand **DARPAConnect** by hosting 50 pop-up events, webinars, and workshops designed to educate, motivate, and inspire nontraditional performers and academic organizations, including Institutions, Colleges, and Universities, to engage with DARPA to grow the national security innovation ecosystem.

⁴ WWG was directed based on a noted deficiency by EEOC in its Technical Assistance Letter. However, it is currently on pause based on the Presidential Memorandum and Executive Order.

- **DAU:** In FY 2024, outreach includes targeting the student population through social media, working with their university career counseling office, and conducting site visits. Additionally, DAU/Human Capital Initiatives (HCI) hosts webinars open to the public to address barriers when applying for Federal internships, such as using USAJobs, creating a federal resume, and understanding the defense acquisition workforce and how it supports national security. HCI continues to build relationships and seek forums to speak with students about opportunities at DAU. In FY 2024, approximately 2,400 applications were received for the DoD College Acquisition Internship Program. Applicants came from across the United States, with 12.58% from Hispanic Serving Institutions, 7.77% from Historically Black Colleges and Universities, and 5.32% from community colleges.
- In FY 2024, **Cost Assessment and Program Evaluation (CAPE)** participated in the DoD Science, Mathematics, and Research for Transformation Scholarship Program, WHS Volunteer Student Internship Program, John S. McCain Strategic Defense Fellows Program, and the Partnership for Public Service Rosenthal Fellowship Program. CAPE participated in several outreach events to increase the highly qualified candidate pool, including DoD-sponsored career fairs, as well as events at the University of Maryland Baltimore County, and Johns Hopkins University.

ELEMENT 3. MANAGEMENT AND PROGRAM ACCOUNTABILITY

Creating Inclusive Workforce Engagement Activities:

- **DARPA** hosted DARPAedia trainings/workshops incorporating Employee Assistance Program seminars to foster more engagement and facilitate deeper conversations about these Programs. DARPA continued Agency-wide social events to encourage camaraderie and promote team building among all staff members. Employees shared experiences and strengthened connections outside the workplace. These gatherings allowed employees to bond and collaborate in a relaxed setting. Additionally, Town Halls were held quarterly to discuss topics driven by employee-generated questions and areas of focus identified Government-wide.
- In FY 2025, CAPE seeks to increase applicants for permanent employment and developmental opportunities. CAPE plans to hold virtual and in-person information sessions at local universities. CAPE also seeks to partner with George Mason University to collaborate with students pursuing mathematics degrees to learn possible career paths in Government.

RA and Personal Assistance Services (PAS): In FY 2024, the WHS RA Office received 392 requests, of which 10 cases are still active. The RA Program continued to provide guidance and training to enable Persons with Disabilities (PwDs) to apply for jobs, perform job functions, and access equal benefits to advance the Agency. WHS actively promoted RA awareness to supervisors and the workforce during customer-focused forums, town halls, leadership meetings, and EEO training. Additionally, RA continued to provide mandatory disability training to managers, supervisors, and HRD/Labor Management and Employee Relations (LMER) as requested, and one-on-one consultation support to managers and employees. DAU processed 23 RA requests, which were approved. To enhance efficiency of the RA process, DAU implemented key improvements, including a modified request form integrating the supervisor's role in the interactive process and a comprehensive medical questionnaire to provide healthcare providers, significantly reducing processing time.

WHS Pentagon Scooter Program offers DoD civilian personnel, service members, and contractors at the Pentagon access to mobility scooters for up to 90 days per year. These scooters help individuals with mobility challenges navigate the Pentagon. The Program is available for short-term use. Civilian personnel

requiring long-term scooter usage engage with their RA Program. Service members requiring long-term scooter usage can consult with their supervisor, while contractors utilize their company's RA Program for assistance. In FY 2024, the WHS Scooter Program supported approximately 102 employees.

American Sign Language (ASL) Interpreting Program (ASLIP): WHS ASLIP team offers both ASL interpreting and reader support services to employees for workplace meetings, training, phone calls, workshops, and special events. In FY 2024, WHS provided RA services for 11 employees (8 deaf and hard-of-hearing employees and 3 blind and low-vision employees). WHS received 2,596 ASLIP service requests and 382 requests for reader services. The average processing time for each request was less than 60 minutes. In addition to providing RAs, the ASLIP team designs and provides lessons on ASL and best practices regarding using interpreters in the workplace, co-taught by deaf WHS employees.

ELEMENT 4. PROACTIVE PREVENTION

AHP: In FY 2024, the AHP received 29 harassment cases. Nine complaints have been investigated and closed out. The inquiries were not initiated within the recommended 10-day timeframe. Four complaints were withdrawn and resolved by the supervisory chain. The other cases remain open pending the assignment of an inquiry officer or a climate assessment to evaluate the workplace environment after the employee's departure. The AHP Administrative Instruction (AI) has been reviewed by WHS EEOP and LMER but is pending review by the Policy and Administrative Support Division. DAU addressed an unacceptable communication harassment practice. Following an investigation, the employee received a Letter of Counseling, was instructed to improve communication with colleagues, and required to complete conflict resolution training.

WHS FY 2025 Planned Activities:

- Finalize the AHP AI.
- Continue to educate our customer serviced population regarding AHP Policies and Procedures.
- Devise a method for receiving anonymous complaints.
- Update AHP on the SharePoint site.
- Devise methods for reducing the timeframe for conducting harassment complaint inquiries.

Disability Working Group (DWG): In FY 2024, WHS EEOP and HRD continued to improve areas in recruitment and outreach, career development and training, data analysis, and communication. The Group continues to build its infrastructure and internal practices and benchmarking with other agencies.

WWG:⁵ In FY 2024, EEOP established its WWG to address actual and perceived barriers impacting women (specifically Whites and Hispanics) in the organization. The Group consisted of a Champion, Co-Chairs, and 17 enthusiastic female and male volunteers eager to identify and address the root causes of the low representation of women in the Agency. The Group, open to women and men, will examine recruitment and outreach, career development, and retention.

EEO Annual Training for Supervisors and Employees: In FY 2024, WHS continued to provide EEO and Prevention of Harassment training for all supervisors and employees on the Complaints process, Prevention of Harassment, ADR, and EEO laws and guidance. The breakdown is as follows:

⁵ As noted above, the WWG was established to address the deficiencies in the 2023 EEOC's Technical Assistance Letter and is currently on pause, based on the Presidential Memorandum and Executive Order.

Training	Attendees
EEO and Anti-Harassment for Supervisors	482
EEO and Anti-Harassment for Non-Supervisors	2,036
Basics of Conflict Management for Supervisors	72
No FEAR Act (online) Training	3,621
Total	6,211

In FY 2024, DAU's South Region completed the annual EEO training for supervisors and non-supervisors, with 58 participants across 2 sessions. DAU will continue to provide mandatory EEO training, ensuring that all personnel are up to date with updated policies, guidance, and regulations.

ELEMENT 5. EFFICIENCY

Complaints Program (EEO Counseling, investigations, acceptance/dismissal decisions, final agency decisions, and final actions):

Complaints (Status and Update): During FY 2024, 61 pre-complaints resulted in 46 individuals filing formal complaints. There was 1 settlement during pre-complaint and 24 pre-complaints that either withdrew or did not file a formal complaint. In FY 2024, there were 13 settlements, compared to 8 in FY 2023. The Agency continued to utilize the Tyler Technologies iComplaints software to track and process complaints, in accordance with regulatory timelines. EEOP has transitioned to Tyler's Entellitrek in FY 2025.

ADR Program: The ADR Program provides essential services that contribute to the WHS mission by providing management and employees with various methods to resolve disputes, address workplace concerns, and manage conflict when it arises. Additionally, the ADR Program provides managers with services to assess the workplace to address issues early. In FY 2024, the ADR Program office conducted 10 mediations to address EEO complaints of alleged discrimination and 9 sessions to address non-EEO workplace issues. Additionally, the ADR Program facilitated 30 climate surveys, 1 group facilitation, 6 focus groups for 1 organization, and 24 sensing sessions for 11 organizations. Other activities included conducting seven training sessions titled "Basics of Conflict Management." EEOP also hosted its annual ADR and Conflict Management Symposium during the third quarter of FY 2024. The "Shaping the ADR and Conflict Management Future: "Trends and Insights for Tomorrow" event was held for 2-days and featured speakers from various DoD Components and other Federal Agencies and non-Governmental organizations. The Chief for Complaints and Adjudication and EEO Specialists actively encourage the use of ADR at each stage of the complaint process, providing positive information on ADR and its benefits in EEO-related matters. This information is also provided during EEO and Anti-Harassment training.

ELEMENT 6. RESPONSIVENESS AND LEGAL COMPLIANCE

Compliance with EEOC: WHS fully complied with all laws, including EEOC Regulations, Orders, Decisions, and Settlement Agreements. All documents requiring legal sufficiency review were coordinated with the WHS and PFPA Office of General Counsel (OGC). EEOP posted all required No FEAR Act information, provided required training, and filed the MD-715, EEOC Form 462 Reports, and other reports required by EEOC and the Office of Personnel Management (OPM). WHS timely implements corrective actions, such as facility postings, trainings, and renders disciplinary actions, as appropriate.

WHS and PFPA OGC: EEOP maintained a cooperative relationship with WHS and PFPA OGC, and consulted on legal issues, matters of mutual interest, and sought advice and expertise when dealing with unique situations.

EEO Investigations: Investigations were completed by the DoD, Defense Human Resources Activity, Defense Services Support Center, Investigations and Resolutions Directorate (IRD). EEOP does not control the timeframes for investigations but expects IRD to adhere to the 180 calendar-day timeframe allowed for such investigations. EEOP took proactive steps to ensure that IRD was notified of requests for investigations in a timely manner, submitted case files prior to IRD's request for documents, and responded to requests in a timely manner.

Part E.3 – Executive Summary: Workforce Analyses

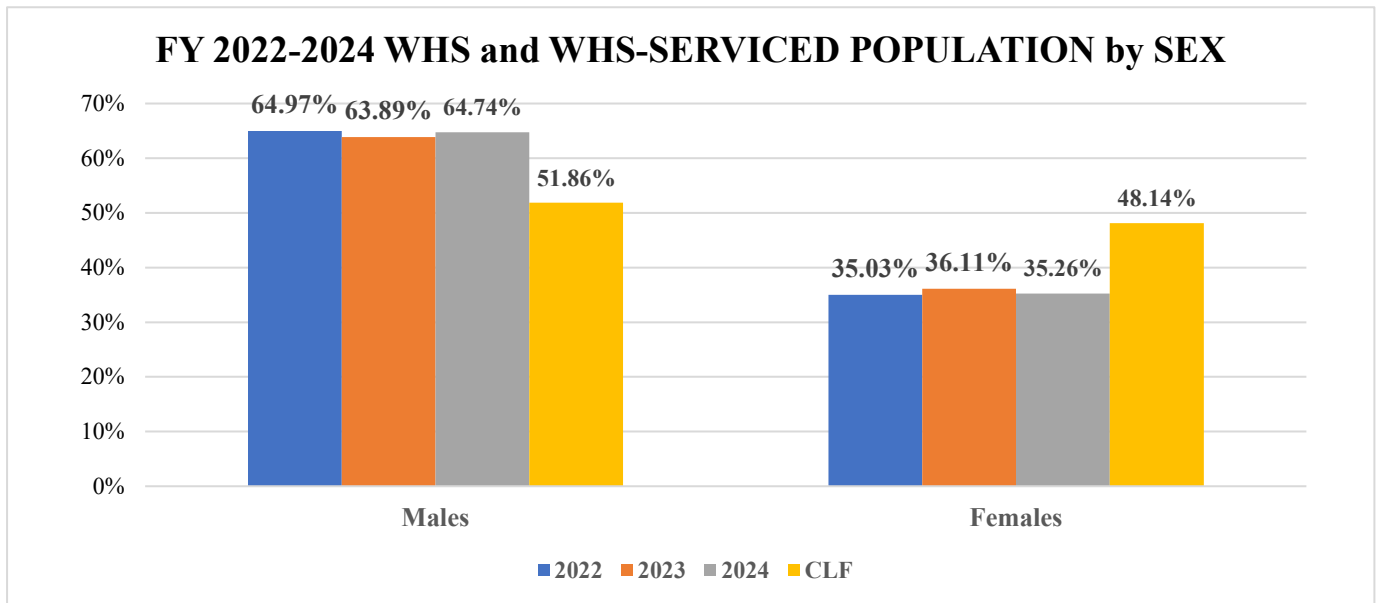
WORKFORCE ANALYSIS

Overall Workforce: At the end of FY 2024, WHS and WHS-serviced Components total (permanent and temporary) workforce consisted of 8,251 full-time and part-time employees, a net increase of 38.37% from FY 2023.⁶ Of the 8,251 employees, 5,342 (64.74%) were males, and 2,909 (35.26%) were females. Compared to the U.S. Census Bureau 2010 Civilian Labor Force (CLF),⁷ WHS has a smaller population of females and a larger population of males. Demographic data was extracted from the Business Objects Enterprise Reporting Service, and the census data was used as a benchmark.

⁶ The previously reported data did not include the workforce data for DARPA, JS, and DAU. Although, EEOP previously serviced DARPA and JS, as they receive their HR servicing from another source, we did not previously have access to their data; therefore, it was not included.

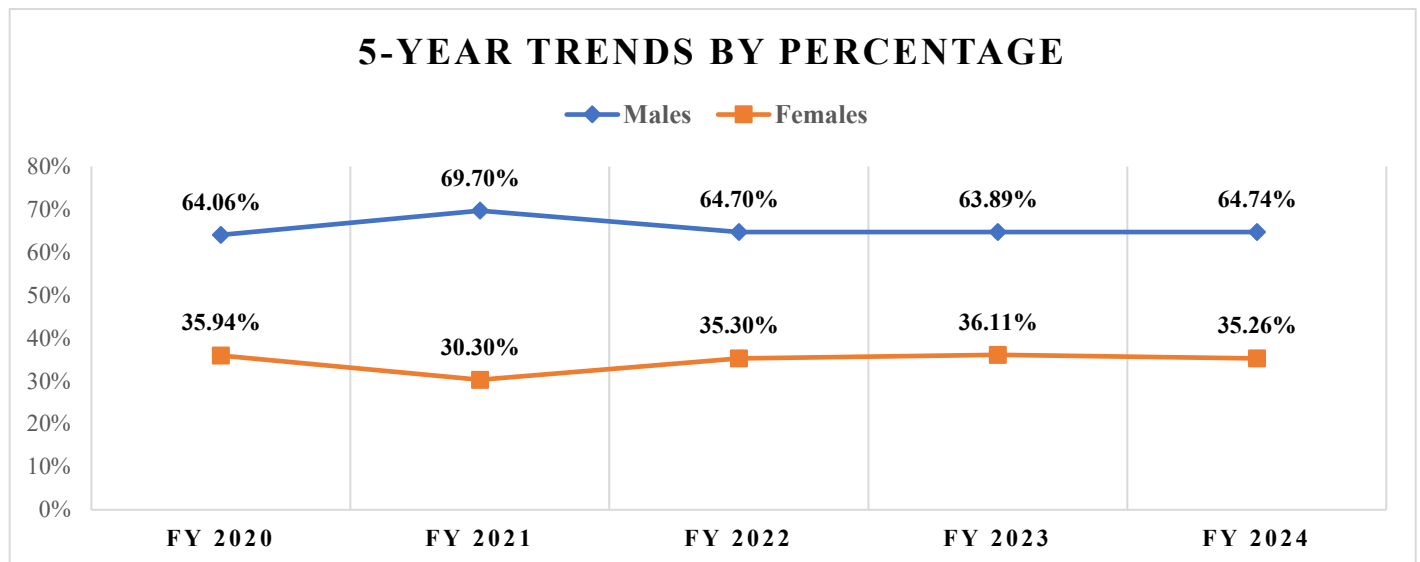
⁷ The CLF is derived from the United States Census and reflects persons 16 years of age or older who were employed or seeking employment, excluding those in the Armed Services. CLF data used in this Report is based on the 2010 Census.

WHS and WHS-serviced Components by Sex



In FY 2024, the male workforce slightly increased, while the female workforce slightly decreased from FY 2023.

WHS and WHS-serviced Components 5-Year Workforce Trends by Percentage

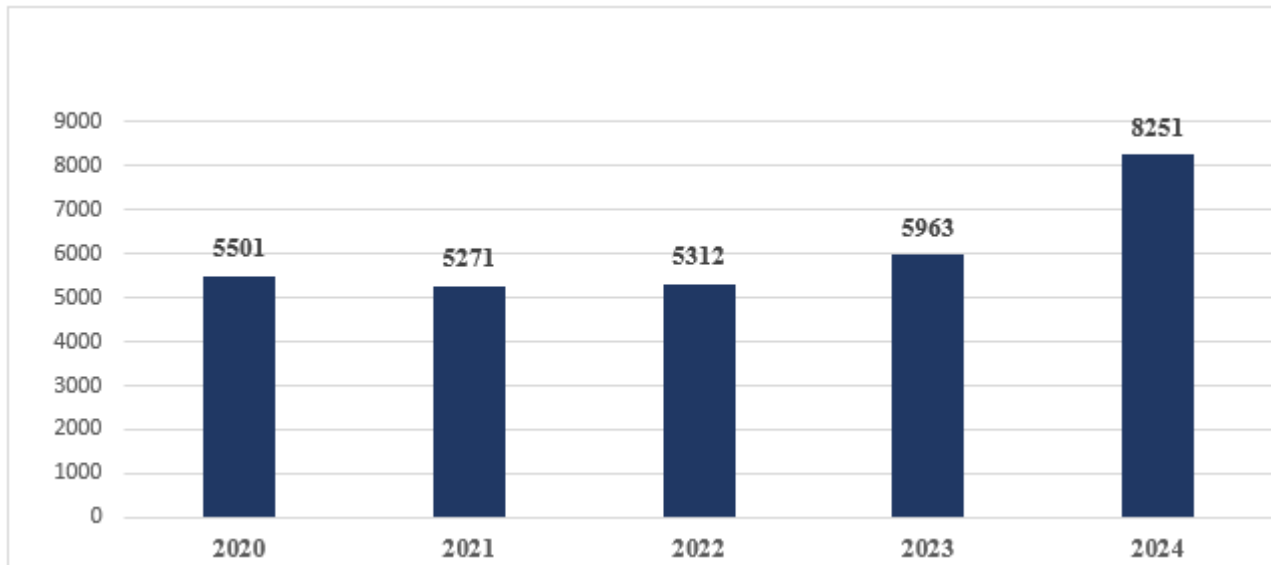


WHS and WHS-serviced components female workforce are consistently below their CLF of 48.14%, while males are consistently above their CLF of 51.86%.

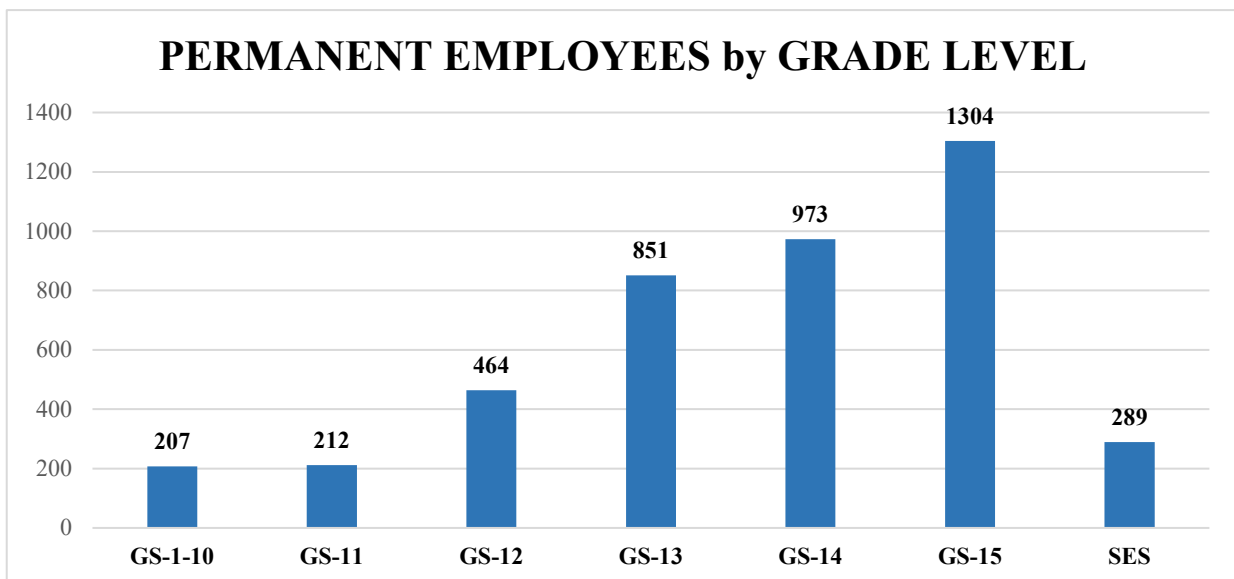
WHS and WHS-serviced Components 5-Year Trends

Over the 5 years, the workforce has fluctuated, with the highest to lowest years in FY 2024 (data includes DAU, DARPA, and JS), FY 2023, FY 2020, FY 2022, and FY 2021.

5-YEAR WORKFORCE TRENDS



WHS and WHS-serviced Components by Grade



Most of WHS and WHS-serviced Components' permanent workforce are between grade levels GS-13 to GS-15. A total of 289 employees are in the senior pay plan.

Section 501 of the Rehabilitation Act Disability Goals: DoD adopted the Federal goal of 12% for hiring PwDs and 2% for hiring persons with targeted disabilities (PwTDs). In 2024, PwDs represented 11.83%

compared to 10.16% in FY 2023; PwTDs represented 1.94% of the workforce compared to 1.83% in FY 2023 (*Table B1*).

When compared to the Federal goals for employment of PwDs and PwTDs:

- PwDs⁸ – 11.83% versus the Federal goal of 12%
- PwTDs⁹ – 1.94% versus the Federal goal of 2%

Agency’s Female Workforce Analysis Summary – The data identified the following triggers:

- Hispanic females were 2.10%, which is below the CLF of 6.16%
- White females were 20.39%, which is below the CLF of 35.64%
- Black females were 9.25%, which is above the CLF of 6.61%
- Asian females were 2.57%, which is slightly above the CLF of 2.18%
- Native Hawaiian females were 0.21%, which is below the CLF of 0.31%
- American Indian females were 0.34%, which is above the CLF of 0.08%
- Two or More Races’ females were 0.41%, which is below the CLF of 1.05%

Agency’s Hispanic Workforce Analysis Summary – The data identified the following triggers:

- Hispanic males were 3.95%, which is below the CLF of 6.82%
- Hispanic females were 2.10%, which is below the CLF of 6.16%

Representation of Hispanic males and females increased slightly during FY 2024, but remained below the CLF, -2.87%, and -4.06%, respectfully.

The Agency breakdown by WHS and WHS-serviced Components by the permanent workforce is as follows:

WHS-serviced Components	Males	Females	Total Workforce	%
*Armed Forces Retirement Home	--	--	--	
DARPA	55	52	107	0.16%
DAU	69	85	154	0.23%
DLSA	88	75	163	0.25%
DPAA	198	118	316	0.48%
DTRMC	18	5	23	0.03%
DTSA	91	38	129	0.19%
OLDCC	28	25	53	0.08%

⁸A reportable disability is a physical or mental impairment that substantially limits one or more major life activities (*e.g.*, caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, or learning) or a record of such impairment.

⁹PwTDs are a subset of those with a reportable disability. The criteria EEOC used to select “targeted disabilities” includes the severity of the disability, the feasibility of recruitment, and the availability of workforce data for this group. OPM modified the definition in 2010 and again in 2016. Targeted disabilities are listed on Table B1-20.

OCJCS and JS	563	253	816	1.25%
OSD	1,268	968	2,236	3.34%
PFPA	910	172	1,082	1.66%
WHS	864	543	1,407	2.16%
USCAAF	15	11	26	0.03%

*Data was not available for this Agency.

The following WHS-serviced Components either did not meet, met, or exceeded the goals of 12% for PwDs and 2% for PwTDs:

WHS-serviced Components	12% Goal	2 % Goal
OSD	10.29%	1.74%
DTRMC	8.70%	8.70%
DLSA	10.43%	1.23%
OLDCC	7.55%	0.00%
PFPA	7.12%	1.20%
USCAAF	3.85%	0.00%
DPAA	15.82%	0.95%
DTSA	9.30%	0.78%
DARPA	11.21%	1.87%
JS	15.44%	1.96%
WHS	15.64%	3.55%

*Characters in red font indicate a failure to meet specified goals

WHS exceeded the goals of 12% for PwDs and 2% for PwTDs from FY 2020 to FY 2024:

FY	PwDs (12%)	PwTDs (2%)
FY 2020	13.83%	2.95%
FY 2021	14.19%	3.30%
FY 2022	14.53%	3.27%
FY 2023	15.43%	3.38%
FY 2024	15.64%	3.55%

FY 2024 PwDs and PwTDs Disability Population

PwTDs	Disability Codes	Population 160	Total % 1.94%
Developmental Disability	02	5	0.06%
Traumatic Brain Injury	03	23	0.28%
Deaf or Serious Difficulty Hearing	19	39	0.47%
Blind or Serious Difficulty Seeing	20	15	0.18%
Missing Extremities	31	1	0.01%
Significant Mobility Impairment	40	7	0.08%
Partial or Complete Paralysis	60	14	0.17%
Epilepsy or Other Seizure Disorders	82	12	0.15%
Intellectual Disability	90	4	0.05%
Significant Psychiatric Disorder	91	39	0.47%
Dwarfism	92	0	0.00%
Significant Disfigurement	93	1	0.01%
PwDs	02-03, 06-99	976	11.83%
Not Identified	01	1225	14.85%
No Disability	05	6050	73.32%

Federal goals require agencies to ensure 12% PwDs and 2% PwTDs. In FY 2024, WHS and WHS-serviced Components did not meet the targeted goal but is committed to ensuring these goals are met (*Table B1*).

Senior Executive Service (SES) and other Senior Grade Levels

SES: For permanent employees in the SES, there was a low representation of Hispanic males and females, Black males and females, and Two or More Races' females. The representation of White males and females and Asian males and females were above their respective CLF.

GS-15 Grades: For permanent GS-15 employees, there was low representation of Hispanic males and females, Black males and females, Native Hawaiian males and females, American Indian or Alaska Native males and females, and Two or More Races' males and females. White males, Asian males, and females were above their respective CLF.

GS-14 Grades: For permanent GS-14 employees, there was a low representation of Hispanic males and females, White females, and Two or More Races' females. White males, Black males and females, Asian males and females, Native Hawaiian males and females, and American Indian or Alaska Native males and females were above their respective CLF.

GS-13 Grades: For permanent GS-13 employees, White males, Black males and females, Asian males and females, and American Indian or Alaska Native males and females were above their respective CLF. All other groups were below their respective CLF (*Table A4P*).

PwDs and PwTDs at SES and other Senior Levels

SES: For permanent employees in the SES, 6.23% identified as PwDs, and 0.35% identified as PwTDs.

GS-15 Grades: For permanent GS-15 employees, 0.11% identified as PwDs, and 0.02% identified as PwTDs.

GS-14 Grades: For permanent GS-14 employees, 0.13% identified as PwDs, and 0.02% identified as PwDs.

GS-13 Grades: For permanent GS-13 employees, 0.20% identified as PwDs, and 0.02% identified as PwTDs (*Table B4P*).

Mission Critical and Most Populous Occupations

WHS-serviced Components have seven major occupation groups: Security Administration (0080), Police (0083), Foreign Affairs (0130), Miscellaneous Administration and Programs (0301), Management and Program Analysis (0343), Contracting (1102), and Information Technology Management (2210).

In FY 2024, there were 6,512 permanent employees. The following is a breakdown of permanent employees and percentages by mission-critical occupations:

Major Occupations	Employees	%
0080 - Security Specialists	210	0.32%
0083 - Police Officers	710	1.09%
0130 - Foreign Affairs Specialists	261	0.41%
0301 - Miscellaneous Administration and Programs Specialists	1014	15.57%
0343 - Management and Program Analysts	668	1.02%
1102 - Contracting Specialists	51	0.07%
2210 - Information Technology Specialists	147	0.22%

Hispanic males were underrepresented in major occupations 0080, 0083, 1102, and 2210, while the representation of Hispanic, White, and Asian females was below the CLF in occupations series 0080, 0083, 0301, 0343, and 2210. White males were underrepresented in occupational series 0083, 0343, 1102, and 2210 (*Table A6*).

Applicant Flow Data (AFD)

In FY 2024, WHS and WHS-serviced Components received AFD from OPM and analyzed the Agency's mission-critical occupations. The table below shows the recruitment results by sex.

Internal Competitive Promotion by Sex

	Males Applied	Males Qualified	Males Selected	Females Applied	Females Qualified	Females Selected
0080	157	96	5	38	17	0
0083	204	139	15	12	11	0
0130	18	13	1	5	4	0
0301	803	438	30	396	209	11

0343	670	376	14	380	184	14
1102	478	202	15	320	176	18
2210	316	126	10	51	21	4

There were zero selection of females in the Internal Competitive Promotion occupational series of 0080, 0083, and 0130.

New Hires by Sex

	Males Applied	Males Qualified	Males Selected	Females Applied	Females Qualified	Females Selected
0080	76	34	1	18	10	0
0083	306	198	20	40	16	4
0301	108	40	15	143	76	0
0343	101	76	1	118	96	2
1102	123	57	10	79	27	9
2210	522	298	11	145	77	1

There were zero selection of females in the New Hires occupational series of 0080 and 0301.

PwDs and PwTDs for the following mission critical occupations.

Major Occupations	2%	12%
0080 - Security Specialists	2.38%	17.14%
0083 - Police Officers	0.42%	3.38%
0130 - Foreign Affairs Specialists	0.38%	4.60%
0301 - Miscellaneous Administration and Programs Specialists	2.07%	14.99%
0343 - Management and Program Analysts	3.59%	16.32%
1102 - Contracting Specialists	0.00%	4.00%
2210 - Information Technology Specialists	2.72%	12.93%

Series 0083, 0130, and 1102 neither meet nor exceed the goal of 12% for PwDs and 2% PwTDs.

AFD for New Hires Management Positions.

- **Managers** received 132 applications for 6 New Hires postings with 1 selection. Of the 132 applicants, 88 were qualified (66 males and 22 females). The one selection was a White male.
- **Supervisors** received 83 applications for 15 New Hires posting with 5 selections. Of the 83 applicants, 48 were qualified (28 males and 20 females). Of the five selections, two were White males, one White female and two were Black males (*Table A18*).

AFD for Internal Promotion Management Positions.

- **Executives** received applications for 12 Internal Promotion postings with 3 selections. Of the 258 applicants, 161 were qualified (109 males and 52 females). Of the three selections, two were White males and one White females.
- **Managers** received 359 applications for 29 Internal Promotion postings with 10 selections. Of the 359 applicants, 186 were qualified (136 males and 50 females). Of the 10 selections, 5 were White males, 2 were White females, 1 Black male, and 1 Black female.
- **Supervisors** received 121 applications for 28 Internal Promotion postings with 12 selections. Of the 121 applicants, 68 were qualified (50 males and 18 females). Of the 12 selections, 6 were White males, 1 White female, 1 Black male and 1 Black female, and 1 Two or More Races male (*Table A19*).

New Hires – WHS and WHS-serviced Components hired 672 permanent and 427 temporary employees in FY 2024. Overall, females were hired for permanent positions (35.58%) at a lower rate than males (64.42%). White males (45.13%) were hired at almost twice the rate of Black males (9.46%); Asian males were hired at 6.37%. White (22.38%) females were hired at lower than the CLF. A total of 5 Hispanic females were hired at a rate of 1.36%. There were 60 permanent and 41 temporary PwDs and 9 permanent and 7 temporary PwTDs hired in FY 2024 (*See Tables A8 and B8*).

Employee Recognition and Awards – A review of *Table A13* reflects males and females received time-off awards (1-9 hours). Males received 56.22% of the awards and females 43.78%. Hispanic males (4.15%) and females (4.15%), White males (33.18%) and females (19.35%), and Black males (15.67%) and females (17.51%) are all below the workforce representation for time-off awards. No time-off awards were given to Native Hawaiian or Other Pacific Islander females nor American Indian or Alaska Native males.

On average, in the category of **cash awards \$500 and under**, males received higher cash awards than females (\$438 versus \$420). *Table B13*, depicts the average cash award for PwDs with all employees was \$417; however, the average cash award for PwTDs was slightly higher at \$421. For **cash awards of \$2,000 - \$2,999**, males received 61.45%, with an average of \$2,378, while females received 38.55% an average of \$2,312. Cash awards of \$2,000 - \$2,999 for PwDs averaged \$2,384 and \$2,366 for PwTDs.

On average, in the category of **cash awards of \$5000 and more**, males received higher cash awards than females (\$1,545 versus \$803). *Table B13*, depicts the average cash award for PwDs was commensurate with all employees (\$8,145); however, the average cash award for PwTDs was higher at \$7,254. For **cash awards of \$5,000 or more**, males received 65.80%, an average of \$8,680, while females received 34.20% with an average of \$8,813. Cash awards of \$5,000 or more for PwDs averaged \$8,145 and \$7,254 for PwTDs.

Three hundred and fifty-two **Quality Step Increases (QSIs)** were given in FY 2024 based on the FY 2023 performance cycle. Of those, 60.51% were males, and 39.49% were females. Five QSI awards were given to Native Hawaiian or Other Pacific Islander, two males and three female employees; four QSI awards were given to American Indian or Alaska Natives, three males and two females. There were 34 (9.66%) PwDs and 3 (0.85%) PwTDs who received awards in this category (*See Tables A13 and B13*).

Employee Separations – In FY 2024, 780 employees separated from the Agency. Males separated at 62.31% (486) and females separated at 37.69% (294), while females represent 35.26% of the workforce. Of the 780 separations, 7 were removals, 234 were resignations, 256 were retirements, and 283 were other

separations. Of the seven removals, three were males and four females. In FY 2024, 69 (13.64%) PwDs and 10 (1.98%) PwTDs permanent employees separated from the Agency (*Tables A14 and B14*).

Part E.5 – Executive Summary: Planned Activities

The following planned activities correspond to deficiencies identified as part of our annual review of EEOC Part G Checklist:

Element B: Integration of EEO in the Agency’s Strategic Mission

B.6.a – Are senior managers involved in the implementation of SEP?

B.6.b – Do senior managers participate in the barrier analysis process?

- Conduct data analysis; identify triggers and possible barriers by developing a spreadsheet.
- Establish Working Groups to address actual or perceived barriers.
- Conduct introductory workshops with key barrier analysis partners.

Element C: Management and Accountability

C.2.c.1 – WHS has not posted its procedures for processing RA and PAS requests on its public website.

- Finalize coordination of the RA/PAS procedures.
- Post procedures for processing PAS/RA requests for on the WHS public website, and cross-link to WHS’s RAs and “Disability-People” pages.

EEOC FORM 715-01 PART F	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
CERTIFICATION of ESTABLISHMENT of CONTINUING EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS		
<p>I, Pamela R. Sullivan, am the Director, Office of Equal Employment Opportunity Programs (EEOP)</p>		
Principal EEO Director/Official For	WHS and WHS serviced components.	
<p>The Agency has conducted an annual self-assessment of Section 717 and Section 501 Programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and, as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program are included with this Federal Agency Annual EEO Program Status Report.</p> <p>The Agency has also analyzed its workforce profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure, or practice is operating to disadvantage any group based on race, national origin, gender, or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.</p> <p>I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.</p>		
SULLIVAN.PAMELA.REN EE.1047227050	Digitally signed by SULLIVAN.PAMELA.REN;EE.1047227050 Date: 2025.03.21 09:33:57 -04'00'	Date
Pamela R. Sullivan Director, EEOP (Signature of Principal EEO Director/Official Certifies that this Federal Agency Annual EEOP is in Compliance with EEO MD-715.)	Date	
MEINERS.REGINA.FAC CHINA.1232122524	Digitally signed by MEINERS.REGINA.FACCHINA.1232122524 Date: 2025.05.05 13:09:14 -04'00'	May 5, 2025
Regina F. Meiners Director, WHS (Signature of Agency Head or Agency Head Designee)	Date	

EEOC FORM 715-01 PART G	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
WHS DOD	For period covering October 1, 2023 to September 30, 2024	

AGENCY SELF-ASSESSMENT CHECKLIST MEASURING ESSENTIAL ELEMENTS

Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP

This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.

Measures	Compliance Indicator: A.1 – The agency issues an effective, up to date EEO policy statement	Measure Met? (YES, NO, N/A)	Comments
A.1.a	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency’s commitment to EEO for all employees and applicants? If “yes,” please provide the annual issuance date in the comments column. [see MD-715, II(A)]	YES	January 2025
A.1.b	Does the EEO policy statement address all protected bases (age, color, disability, and sex), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 C.F.R. § 1614.101(a)]	N/A	Per Presidential Memorandum and Executive Order.

Measures	Compliance Indicator: A.2 – The agency has communicated EEO policies and procedures to all employees.	Measure Met? (YES, NO, N/A)	Comments
A.2.a	Does the agency disseminate the following policies and procedures to all employees:		
A.2.a.1	Anti-Harassment policy? [see MD 715, II(A)]	YES	
A.2.a.2	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	YES	
A.2.b	Does the agency prominently post the following information throughout the workplace and on its public website:	YES	

Measures	Compliance Indicator: A.2 – The agency has communicated EEO policies and procedures to all employees.	Measure Met? (YES, NO, N/A)	Comments
A.2.b.1	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]	YES	
A.2.b.2	Written materials concerning the EEO Program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	YES	
A.2.b.3	RA procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column. https://whs.sp.pentagon.mil/HRD/DDR/SitePages/Disability.aspx	YES	
A.2.c	Does the agency inform its employees about the following topics:		
A.2.c.1	EEO complaint process? [see 29 C.F.R §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes,” please provide how often.	YES	During EEO Monthly Training.
A.2.c.2	ADR process? [see MD-110, Change (Ch.) 3(II)(C)] If “yes,” please provide how often.	YES	During EEO Monthly Training.
A.2.c.3	RA Program? [see 29 C.F.R § 1614.203(d)(7)(ii)(C)] If “yes,” please provide how often.	YES	During EEO Monthly Training.
A.2.c.4	AHP? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes,” please provide how often.	YES	
A.2.c.5	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 C.F.R § 2635.101(b)] If “yes,” please provide how often.	YES	

Measures	Compliance Indicator: A.3 – The agency assesses and ensures EEO principles are part of its culture.	Measure Met? (YES, NO, N/A)	Comments
A.3.a	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 C.F.R § 1614.102(a) (9)] If “yes,” provide one or two examples in the comments section.	YES	

Measures	Compliance Indicator: A.3 – The agency assesses and ensures EEO principles are part of its culture.	Measure Met? (YES, NO, N/A)	Comments
A.3.b	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 C.F.R Part 250]	YES	

Essential Element B: INTEGRATION OF EEO INTO THE AGENCY’S STRATEGIC MISSION

This element requires that the agency’s EEO Programs are structured to maintain a workplace that is free from discrimination and support the agency’s strategic mission.

Measures	Compliance Indicator: B.1 – The reporting structure for the EEO Program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO Program.	Measure Met? (YES, NO, N/A)	Comments
B.1.a	Is the agency head the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office? [see 29 C.F.R §1614.102(b)(4)]	YES	
B.1.a.1	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If “yes,” please provide the title of the agency head designee in the comments.	N/A	
B.1.a.2	Does the agency’s organizational chart clearly define the reporting structure for the EEO office? [see 29 C.F.R §1614.102(b)(4)]	YES	
B.1.b	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency’s EEO Program? [see 29 C.F.R § 1614.102(c)(1); MD-715 Instructions, Sec. I]	YES	
B.1.c	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the “State of the agency” briefing covering the six essential elements of the model EEO Program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I)] If “yes,” please provide the date of the briefing in the comments column.	YES	
B.1.d	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]	YES	

Measures	Compliance Indicator: B.2 – The EEO Director controls all aspects of the EEO Programs.	Measure Met? (YES, NO, N/A)	Comments
B.2.a	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 C.F.R § 1614.102(c)]	YES	

Measures	Compliance Indicator: B.2 – The EEO Director controls all aspects of the EEO Programs.	Measure Met? (YES, NO, N/A)	Comments
B.2.b	Is the EEO Director responsible for overseeing the completion of EEO counseling? [see 29 C.F.R §1614.102(c)(4)]	YES	
B.2.c	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 C.F.R §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	YES	
B.2.d	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 C.F.R §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	YES	
B.2.e	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 C.F.R §§ 1614.102(e); 1614.502]	YES	
B.2.f	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 C.F.R §1614.102(c)(2)]	YES	
B.2.g	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 C.F.R §§ 1614.102(c)(2) and (c)(3)]	YES	

Measures	Compliance Indicator: B.3 – The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.	Measure Met? (YES, NO, N/A)	Comments
B.3.a	Do EEO Program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]	YES	
B.3.b	Does the agency’s current strategic plan? [see MD-715, II(B)] If “yes,” please identify the EEO principles in the strategic plan in the comments column.	N/A	Per Presidential Memorandum and Executive Order

Measures	Compliance Indicator: B.4 – The agency has sufficient budget and staffing to support the success of its EEO Program.	Measure Met? (YES, NO, N/A)	Comments
B.4.a	Pursuant to 29 C.F.R. §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO Program, for the following areas:		
B.4.a.1	to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	YES	
B.4.a.2	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	YES	
B.4.a.3	to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 C.F.R. § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	YES	
B.4.a.4	to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	YES	
B.4.a.5	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 C.F.R. §1614.102(c)(2)]	YES	
B.4.a.6	to publish and distribute EEO materials (e.g., harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	YES	
B.4.a.7	to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	YES	
B.4.a.8	to effectively administer its Special Emphasis Programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 U.S.C. § 7201; 38 U.S.C. § 4214; 5 C.F.R. § 720.204; 5 C.F.R. § 213.3102(t) and (u); 5 C.F.R. § 315.709]	YES	Going forward will comply with Presidential Memorandum and Executive Order.

Measures	Compliance Indicator: B.4 – The agency has sufficient budget and staffing to support the success of its EEO Program.	Measure Met? (YES, NO, N/A)	Comments
B.4.a.9	to effectively manage its anti-harassment program? [see MD-715 Instructions, Section (Sec.) I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	YES	
B.4.a.10	to effectively manage its reasonable accommodation program? [see 29 C.F.R. § 1614.203(d)(4)(ii)]	YES	
B.4.a.11	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	YES	
B.4.b	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 C.F.R. § 1614.102(a)(1)]	YES	
B.4.c	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	YES	
B.4.d	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?	YES	
B.4.e	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	YES	

Measures	Compliance Indicator: B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.	Measure Met? (YES, NO, N/A)	Comments
B.5.a	Pursuant to 29 C.F.R. § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO Program:		
B.5.a.1	EEO Complaint Process? [see MD-715(II)(B)]	YES	
B.5.a.2	Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]	YES	
B.5.a.3	Anti-Harassment Policy? [see MD-715(II)(B)]	YES	
B.5.a.4	Supervisory, managerial, communication and interpersonal skills in order to supervise most effectively in a workplace and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	N/A	Per Presidential Memorandum and Executive Order.

Measures	Compliance Indicator: B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.	Measure Met? (YES, NO, N/A)	Comments
B.5.a.5	ADR, with emphasis on the Federal Government’s interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	YES	

Measures	Compliance Indicator: B.6 – The agency involves managers in the implementation of its EEO Program.	Measure Met? (YES, No, N/A)	Comments
B.6.a	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	NO	See PART H-1
B.6.b	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	NO	See PART H-1
B.6.c	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	YES	
B.6.d	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 C.F.R. § 1614.102(a)(5)]	YES	

Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY

This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency’s EEO Program and Plan.

Measures	Compliance Indicator: C.1 – The agency conducts regular internal audits of its component and field offices.	Measure Met? (YES, NO, N/A)	Comments
C.1.a	Does the agency regularly assess its component and field offices for possible EEO Program deficiencies? [see 29 C.F.R. §1614.102(c)(2)] If “yes,” please provide the schedule for conducting audits in the comments section.	N/A	
C.1.b	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 C.F.R. §1614.102(c)(2)] If “yes,” please provide the schedule for conducting audits in the comments section.	N/A	
C.1.c	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	N/A	

Measures	Compliance Indicator: C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (YES, NO, N/A)	Comments
C.2.a	Has the agency established comprehensive Anti-Harassment policy and procedures that comply with EEOC’s enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	YES	
C.2.a.1	Does the Anti-Harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	YES	
C.2.a.2	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	YES	
C.2.a.3	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	YES	
C.2.a.4	Does the agency ensure that the EEO office informs the AHP of all EEO counseling activity alleging harassment? [see Enforcement Guidance, V.C.]	YES	
C.2.a.5	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <u>Complainant v. Department of Veterans Affairs</u> , EEOC Appeal No. 0120123232 (May 21, 2015); <u>Complainant v. Department of Defense (Defense Commissary Agency)</u> , EEOC Appeal No. 0120130331 (May 29, 2015)] If “no,” please provide the percentage of timely-processed inquiries in the comment’s column.	YES	
C.2.a.6	Do the agency’s training materials on its Anti-Harassment policy include examples of disability-based harassment? [see 29 C.F.R. 1614.203(d)(2)]	YES	

Measures	Compliance Indicator: C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (YES, NO, N/A)	Comments
C.2.b	Has the agency established disability reasonable accommodation procedures that comply with EEOC’s regulations and guidance? [see 29 C.F.R. 1614.203(d)(3)]	YES	
C.2.b.1	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 C.F.R. 1614.203(d)(3)(D)]	YES	
C.2.b.2	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	YES	
C.2.b.3	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 C.F.R. 1614.203(d)(1)(ii)(B)]	YES	
C.2.b.4	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action Plan? [see 29 C.F.R. 1614.203(d)(3)(i)(M)]	YES	
C.2.b.5	Does the agency process all accommodation requests within the timeframe set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no,” please provide the percentage of timely processed requests in the comments column.	YES	
C.2.c	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC’s regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 C.F.R. 1614.203(d)(6)]	YES	
C.2.c.1	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 C.F.R. § 1614.203(d)(5)(v)] If “yes,” please provide the internet address in the comments column.	NO	See Part H-2

Measures	Compliance Indicator: C.3 – The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	Measure Met? (YES, NO, N/A)	Comments
C.3.a	Pursuant to 29 C.F.R. §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO Program?	YES	
C.3.b	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:		
C.3.b.1	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]	YES	
C.3.b.2	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 C.F.R. §1614.102(b)(6)]	YES	
C.3.b.3	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	YES	
C.3.b.4	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace? [see MD-715 Instructions, Sec. I]	N/A	Per Presidential Memorandum and Executive Order.
C.3.b.5	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 C.F.R. §1614.102(a)(7)]	YES	
C.3.b.6	Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 C.F.R. §1614.102(a)(8)]	YES	
C.3.b.7	Support the EEO Program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]	YES	
C.3.b.8	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]	YES	
C.3.b.9	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	YES	

Measures	Compliance Indicator: C.3 – The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	Measure Met? (YES, NO, N/A)	Comments
C.3.c	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 C.F.R. §1614.102(c)(2)]	YES	
C.3.d	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 C.F.R. §1614.102(c)(2)]	YES	

Measures	Compliance Indicator: C.4 – The agency ensures effective coordination between its EEO Programs and Human Resources (HR) Program.	Measure Met? (YES, NO, N/A)	Comments
C.4.a	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 C.F.R. §1614.102(a)(2)]	YES	
C.4.b	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the Program by all EEO groups? [see MD-715 Instructions, Sec. I]	YES	
C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 C.F.R. §1614.601(a)]	YES	
C.4.d	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	YES	
C.4.e	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:		
C.4.e.1	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 C.F.R. §1614.203(d); MD-715, II(C)]	YES	

Measures	Compliance Indicator: C.4 – The agency ensures effective coordination between its EEO Programs and Human Resources (HR) Program.	Measure Met? (YES, NO, N/A)	Comments
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	YES	
C.4.e.3	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	YES	
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	YES	
C.4.e.5	Assist in preparing the MD-715 report? [see MD-715, II(C)]	YES	

Measures	Compliance Indicator: C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.	Measure Met? (YES, No, N/A)	Comments
C.5.a	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 C.F.R. § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)]	YES	
C.5.b	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 C.F.R. §1614.102(a)(6)] If “yes,” please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	YES	
C.5.c	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [see MD-715, II(C)]	YES	

Measures	Compliance Indicator: C.6 – The EEO office advises managers/supervisors on EEO matters.	Measure Met? (YES, NO, N/A)	Comments
C.6.a	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If “yes,” please identify the frequency of the EEO updates in the comments column.	YES	

Measures	Compliance Indicator: C.6 – The EEO office advises managers/supervisors on EEO matters.	Measure Met? (YES, NO, N/A)	Comments
C.6.b	Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I]	YES	

Essential Element D: PROACTIVE PREVENTION

This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.

Measures	Compliance Indicator: D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.	Measure Met? (YES, NO, N/A)	Comments
D.1.a	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	YES	
D.1.b	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; Special Emphasis Programs; reasonable accommodation Program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] ¹⁰	YES	Going forward will comply with Presidential Memorandum and Executive Order.
D.1.c	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities? [see 29 C.F.R. 1614.203(d)(1)(iii)(C)]	N/A	The Exit and Stay surveys inquired into retention, reason for leaving, and to where. They did not inquire into recruitment, hiring, inclusion, or advancement of IwDs.

¹⁰ Per OPM Memorandum, effective February 5, 2025, Programs, workforce data, and complaints/grievance data must continue as regulatory and statutory requirements. As well as agency heads retain the discretion to allow employees to host affinity group lunches, engage in mentorship programs, and otherwise gather for social and cultural events.

Measures	Compliance Indicator: D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Measure Met? (YES, NO, N/A)	Comments
D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	YES	
D.2.b	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 C.F.R. §1614.102(a)(3)]	YES	
D.2.c	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 C.F.R. §1614.102(a)(3)]	YES	
D.2.d	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, Special Emphasis Programs, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] If “yes,” please identify the data sources in the comments column.	YES	Going forward will comply with Presidential Memorandum and Executive Order (see footnote 9).

Measures	Compliance Indicator: D.3 – The agency establishes appropriate action plans to remove identified barriers.	Measure Met? (YES, NO, N/A)	Comments
D.3.a.	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 C.F.R. §1614.102(a)(3)]	YES	
D.3.b	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	YES	
D.3.c	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	YES	

Measures	Compliance Indicator: D.4 – The agency has an Affirmative Action Plan for PwDs, including PwTDs.	Measure Met? (YES, NO, N/A)	Comments
D.4.a	Does the agency post its Affirmative Action Plan on its public website? [see 29 C.F.R. 1614.203(d)(4)]; Please provide the internet address in the comments.	YES	
D.4.b	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 C.F.R. 1614.203(d)(1)(i)]	YES	
D.4.c	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 C.F.R. 1614.203(d)(1)(ii)(A)]	YES	
D.4.d	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 C.F.R. 1614.203(d)(7)(ii)]	YES	Conducted special recruiting efforts: WRP, Wounded Warrior Program.

Essential Element E: EFFICIENCY

This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency’s EEO Programs and an efficient and fair dispute resolution process.

Measures	Compliance Indicator: E.1 – The agency maintains an efficient, fair, and impartial complaint resolution process.	Measure Met? (YES, NO, N/A)	Comments
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 C.F.R. §1614.105?	YES	
E.1.b	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 C.F.R. §1614.105(b)(1)?	YES	
E.1.c	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?	YES	
E.1.d	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments.	YES	
E.1.e	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel	YES	

Measures	Compliance Indicator: E.1 – The agency maintains an efficient, fair, and impartial complaint resolution process.	Measure Met? (YES, NO, N/A)	Comments
	in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 C.F.R. §1614.102(b)(6)?		
E.1.f	Does the agency timely complete investigations, pursuant to 29 C.F.R. §1614.108?	YES	
E.1.g	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 C.F.R. §1614.108(g)?	YES	
E.1.h	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 C.F.R. §1614.110(b)?	YES	
E.1.i	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge’s decision, pursuant to 29 C.F.R. §1614.110(a)?	YES	
E.1.j	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If “yes,” please describe how in the comments column.	N/A	
E.1.k	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	YES	
E.1.l	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 C.F.R. § 1614.403(g)]	YES	

Measures	Compliance Indicator: E.2 – The agency has a neutral EEO process.	Measure Met? (YES, NO, N/A)	Comments
E.2.a	Has the agency established a clear separation between its EEO Complaint Program and its defensive function? [see MD-110, Ch. 1(IV)(D)]	YES	
E.2.b	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If “yes,” please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.	YES	
E.2.c	If the EEO office relies on the agency’s defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]	YES	
E.2.d	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	YES	
E.2.e	If applicable, are processing time frames incorporated for the legal counsel’s sufficiency review for timely processing of complaints? [see EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)]	YES	

Measures	Compliance Indicator: E.3 – The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Measure Met? (YES, NO, N/A)	Comments
E.3.a	Has the agency established an ADR Program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 C.F.R. §1614.102(b)(2)]	YES	
E.3.b	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	YES	
E.3.c	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	YES	
E.3.d	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	YES	
E.3.e	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	YES	

Measures	Compliance Indicator: E.3 – The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Measure Met? (YES, NO, N/A)	Comments
E.3.f	Does the agency annually evaluate the effectiveness of its ADR Program? [see MD-110, Ch. 3(II)(D)]	YES	

Measures	Compliance Indicator: E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO Program.	Measure Met? (YES, NO, N/A)	Comments
E.4.a	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:		
E.4.a.1	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	YES	
E.4.a.2	The race, national origin, sex, and disability status of agency employees? [see 29 C.F.R. §1614.601(a)]	YES	
E.4.a.3	Recruitment activities? [see MD-715, II(E)]	YES	
E.4.a.4	External and internal applicant flow data concerning the applicants’ race, national origin, sex, and disability status? [see MD-715, II(E)]	YES	
E.4.a.5	The processing of requests form Reasonable accommodation? [29 C.F.R. §1614.203(d)(4)]	YES	
E.4.a.6	The processing of complaints for the Anti-Harassment Program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	YES	
E.4.b	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	YES	

Measures	Compliance Indicator: E.5 – The agency identifies and disseminates significant trends and best practices in its EEO Program.	Measure Met? (YES, NO, N/A)	Comments
E.5.a	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes,” provide an example in the comments.	YES	
E.5.b	Does the agency review other agencies’ best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If “yes,” provide an example in the comments.	YES	

Measures	Compliance Indicator: E.5 – The agency identifies and disseminates significant trends and best practices in its EEO Program.	Measure Met? (YES, NO, N/A)	Comments
E.5.c	Does the agency compare its performance in the EEO process to other Federal agencies of similar size? [see MD-715, II(E)]	YES	

Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE

This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.

Measures	Compliance Indicator: F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.	Measure Met? (YES, NO, N/A)	Comments
F.1.a	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 C.F.R. §1614.102(e); MD-715, II(F)]	YES	
F.1.b	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	YES	
F.1.c	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	YES	
F.1.d	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	YES	
F.1.e	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	YES	

Measures	Compliance Indicator: F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Measure Met? (YES, NO, N/A)	Comments
F.2.a	Does the agency timely respond and fully comply with EEOC orders? [see 29 C.F.R. §1614.502; MD-715, II(E)]	YES	
F.2.a.1	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 C.F.R. §1614.108(g)]	YES	

Measures	Compliance Indicator: F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Measure Met? (YES, NO, N/A)	Comments
F.2.a.2	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 C.F.R. §1614.501]	YES	
F.2.a.3	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 C.F.R. §1614.403(e)]	YES	
F.2.a.4	Pursuant to 29 C.F.R. §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	YES	

Measures	Compliance Indicator: F.3 – The agency reports to EEOC its Program efforts and accomplishments.	Measure Met? (YES, NO, N/A)	Comments
F.3.a	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	YES	
F.3.b	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 C.F.R. §1614.703(d)]	YES	

MD-715 – Part H – 1

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

Please describe the status of each plan that the agency has implemented to correct deficiencies in the EEO program. If the agency did not address any deficiencies during the reporting period, please check the box.

Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element B B.6.a	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]
Element B B.6.b	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]

Objective(s) and Dates for EEO Plan

Date Initiated	Objective	Target Date	Modified Date	Date Completed
09/30/2021	Ensure senior managers are involved in the implementation and attendance of Special Emphasis Programs.	09/30/2023	12/31/2025	
11/01/2021	Establish Champions to actively engage in the barrier analysis process.	06/30/2022		10/31/2024

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (YES or NO)
Director, EEOP	Pamela R. Sullivan	NO
Chief Human Resources Officer/HRD	Christine N. Nalli	NO

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Funding and Staffing? (YES or NO)	Modified Date	Completion Date
9/30/2022	Conduct data analysis; identify triggers and possible barriers by developing a spreadsheet.	YES		10/30/2024
01/15/2023	Conduct introductory workshops with key barrier analysis partners.	YES		10/20/2024

Report of Accomplishments

FY	Accomplishments
2024	<p>In FY 2024, WHS EEOP and HRD continued to improve areas in recruitment and outreach, career development and training, data analysis, and communication. The group developed a disability action plan, standard operating procedures, a schedule A fact sheet, and a list of external partnerships with organizations, such as the Department of Aging and Rehabilitative Services and the Virginia Department of the Blind and Vision Impaired. A list of colleges and universities were identified and provided to the WHS Recruitment Team; the list includes:</p> <ol style="list-style-type: none"> 1. Gallaudet University, Washington D. C. 2. RIT/NTID Co-op/Job Postings National Technical Institute for the Deaf RIT 3. NOVA – Northern Virginia 4. Austin Community College 5. University of Texas 6. California State University, Northridge 7. Southwest Collegiate Institute of the Deaf, Texas <p>In FY 2024, EEOP established its WWG to address actual and perceived barriers impacting women in the Agency. The group consists of a Champion, 2 Co-Chairs, 2 technical experts for EEOP and HRD, and 20 enthusiastic volunteers eager to identify and address the root causes of the low representation of women in the Agency. The group will examine the Agency’s recruitment and outreach, career development, and Retention Programs.</p>
2023	<p>In FY 2023, WHS EEOP and HRD established the DWG. The DWG is comprised of an SES Champion, a facilitator, and eight volunteers. The DWG examined the following areas: recruitment and outreach, career development and training, data analysis, and communication. The group built its infrastructure and sought volunteers to assess internal practices and benchmarking with other agencies.</p>

	<p>Also, in FY 2023, WHS EEOP developed an action plan to address the barriers to the female workforce, specifically Women in STEM occupations. EEOP sought to establish a working group to explore root causes and connections between the triggers, its workforce statistics, and any policies, procedures, or practices that might be causing the discrepancies.</p> <p>EEOP held collaborative meetings with HRD to discuss HR/EEO-related activities and explore initiatives to attract, hire, and promote a workforce, including Veterans and disability-employment-focused events. In addition, HRD and EEOP discussed outreach opportunities and hiring strategies and identified and mitigated barriers to promote successful Employment Programs.</p> <p>EEOP continued to analyze the workforce data, which identifies various triggers within WHS' permanent and disability workforce, including triggers for new hires, separations, mission-critical occupations, and awards.</p>
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MD-715 – Part H – 2

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

Please describe the status of each plan that the agency has implemented to correct deficiencies in the EEO Program. If the agency did not address any deficiencies during the reporting period, please check the box.

Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Management and Program Accountability C.2.c.1	WHS has not posted its procedures for processing PAS requests on its public website.
Management and Program Accountability	WHS has not issued compliant reasonable accommodation procedures.

Objective(s) and Dates for EEO Plan

Date Initiated	Objective	Target Date	Modified Date	Date Completed
10/01/2023	Post procedures for processing PAS requests on the WHS public website.	12/30/2023	12/30/2025	
10/01/2024	Finalize the coordination of the RA procedures.	12/30/2025		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (YES or NO)
Chief Human Resources Officer/HRD	Christine N. Nalli	NO
Reasonable Accommodations PM	Tara D. Howard-Bennett	NO

Planned Activities toward Completion of Objective

Target Date	Planned Activities	Sufficient Funding and Staffing? (YES or NO)	Modified Date	Completion Date
09/30/2023	Finalize coordination of the RA/PAS procedures.	YES	12/31/2025	
10/01/2023	Post procedures for processing PAS/RA requests for on the WHS public website, and cross-link to WHS' RAs and "Disability-People" Pages.	YES	12/31/2025	

Report of Accomplishments

FY	Accomplishments
2024	<p>In FY 2024, the new RA and PAS procedures (Administrative Instruction (AI)-114, "Reasonable Accommodations for Individuals with Disabilities," dated October 24, 2013, as amended) were developed to highlight the roles and responsibilities of various stakeholders throughout the RA process. This procedure is currently in formal coordination for approval.</p> <p>The Disability Program Manager developed the Agency PAS procedures. This procedure is currently in formal coordination for approval.</p> <p>RA FY 2025 New Plans</p> <p>RA will provide new forms that allow us to manage cases more effectively and will provide relevant information necessary to assist with deciding the accommodations provided.</p> <ul style="list-style-type: none"> • New training and education for every manager and supervisor with updated information. • Virtually/In Person • New tracking process. • New separate PAS Guidelines published. • New brochures for RA and other programs offered under RA.
2023	<p>In FY 2023, the EEOP collaborated with the RA staff to review all aspects of the RA Programs. The team reviewed and submitted a request for an updated SD Form-827, currently in the coordination process. Additionally, they are developing new updated training and workbooks to maintain documented RA cases, which identify types of accommodations, number of cases, the departments, and occupations of the requesters. In the first quarter of FY 2023, the selected RA PM joined and began serving the needs of the Agency.</p> <p>The new RA and PAS procedures (AI-114) were developed to highlight the roles and responsibilities of various stakeholders throughout the RA process. It is currently in formal coordination for approval.</p>

	Additionally, RA continued to provide mandatory disability training to managers, supervisors, and LMER, as requested, and one-on-one consultation support to managers and employees.
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MD-715 – Part I

Agency EEO Plan to Eliminate Identified Barrier

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

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

FEMALE WORKFORCE

Statement of Condition that was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Female Workforce	Tables A1, A3, A8, and A16	<p>WHS and WHS-serviced Components Total Workforce: WHS and WHS-serviced Components permanent workforce data (Table A1), reflects a low representation of females 2909 (35.26%) compared to the CLF of (48.21%). The Agency's female workforce remains significantly below the 48.21% CLF. Specifically, Hispanic females 173 (2.10%), White females 1,682 (20.39%), Native Hawaiian or Other Pacific Islander 17 (0.21%) and Two or More Races 38 (0.46%) are below their respective CLFs.</p> <p>Permanent workforce for FY 2024 consisted of 6,512 individuals, a 7.61% increase in compared with FY 2023. The female workforce consisted of 2,345 (36.01%), a 581 increase in comparison with FY 2023, but still remained significantly lower than the 48.21% CLF. The Permanent workforce female representation (36.01%) is broken down as follows: Executives (43.60%), Supervisors (35.03%, Professionals (38.81%), and Administrative Workers (57.43%).</p> <p>New Hires in the Total Workforce: The Agency hired 1,099 new employees, 391 (35.58%) females, which falls below the CLF of 48.21%. New Hire representation is broken down as follows: Hispanic (1.36%); White (22.38%); Black (8.10%); Asian (2.73%); Native Hawaiian and Pacific Islander (0.36%); American Indian and Alaska Native (0.45%); and Two or More Races (0.18%).</p> <p>Total Workforce Separation: Seven hundred and eighty employees separated from the Agency in FY 2024. Two Hundred and ninety-four (37.69%) females separated, which was higher than the total workforce of 35.26% and below the CLF of 48.16% of the overall WHS workforce. The WHS female workforce remained significantly underrepresented in comparison with their perspective CLFs.</p>

<p>Female Workforce GS-14 thru SES</p>	<p>Table A4</p>	<p>In comparison to the permanent workforce, female representation was 36.01%. The following are areas of concern: The GS-15 female participation rate was 465 (35.66%). In FY 2024, the total representation for Hispanic females was 2.19% compared to the permanent workforce of 2.13%; Black females were 4.83% compared to the permanent workforce of 10.50%.</p> <p>The Agency has 289 SES professionals. The female workforce representation is as follows: Female SES population 119 (41.18%). Hispanic females were 2 (0.69%), White females were 92 (31.83%), Black females 7 (2.42%), Asian females were 14 (4.84%), Native Hawaiian were 2 (0.69%), and American Indian or Alaska Native were 2 (0.69%).</p> <p>Senior-grade level female representation was GS-14, 393 (40.39%), an increase of 6.20% compared with FY 2023. GS-15, 465 (35.66%), an increase of 7.95% compared with FY 2023, and SES 119 (41.18%), an increase of 9.32% compared with FY 2023.</p>
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EEO Group(s) Affected by Trigger

EEO Group
All Women
Hispanic or Latino Females
White Females
Asian Females
Native Hawaiian or Other Pacific Islander Females
American Indian or Alaska Native Females
Two or More Races Females

Barrier Analysis Process

Sources of Data	Source Reviewed? (YES or NO)	Identify Information Collected
Workforce Data Tables	YES	Examined the workforce data
Complaint Data (Trends)	YES	In FY 2024, 26 Formal Complaints were filed by females, of which 12 claimed sex; 7 claimed disability and race; 11 claimed age; color 2; National Origin 4; and reprisal 13.
Grievance Data (Trends)	YES	In FY 2024, 32 females filed, of which 15 were Black, 7 were White, 2 were Asian, and 3 were 2 Two or More Races compared to FY 2023, which were 19 females, 9 were White, 8 were Black, and 2 were Two or More Races.
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	YES	In FY 2024, there were 29 Anti-Harassment claims, of which 18 were women, 1 Hispanic, 4 White, 7 Black, 1 Asian, 1 Two or More Races, and 4 Race or National Origin (RNO) were not identified.
Climate Assessment Survey (e.g., FEVS)	YES	In FY 2024, EEOP facilitated 30 Climate Assessment Surveys. Data will be captured and analyzed in FY 2025.
Exit Interview Data	NO	The exit survey questions were revised in FY 2024; to date, 173 employees have taken the survey. Data will be captured and analyzed in FY 2025.
Focus Groups	YES	
Interviews	NO	
Reports (e.g., Congress, EEOC, MSPB, Government	NO	

Sources of Data	Source Reviewed? (YES or NO)	Identify Information Collected
Accountability Office (GAO), OPM)		
Other (Please Describe)	NO	

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (YES or NO)	Barrier(s) Identified? (YES or NO)
NO	YES

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
WHS needs to determine why females have a low representation in WHS's total workforce and why females separated the Agency at 35.26%.

Objective(s) and Dates for EEO Plan¹¹

Objective	Date Initiated	Target Date	Sufficient Funding and Staffing? (YES or NO)	Modified Date	Date Completed
Collaborate with HRD's Recruitment Team on events and efforts for females.	10/01/2021	10/01/24	YES	10/01/26	

¹¹ This plan is required and relevant to deficiencies noted by EEOC. However, the Agency will comply with the Presidential Memorandum and Executive Order.

Objective	Date Initiated	Target Date	Sufficient Funding and Staffing? (YES or NO)	Modified Date	Date Completed
Collaborate with HRD to develop a Recruitment and Outreach Plan identifying undergraduate, graduate schools and universities, summer internships and associations for Women.	10/01/2021	10/01/22	YES	10/01/25	
Examine the Applicant Flow Data to determine whether women are applying and/or being selected.	10/01/2021	10/12/23	YES	12/31/24	10/31/24

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (YES or NO)
Director, EEOP	Pamela R. Sullivan	YES
Chief Human Resources Officer/HRD	Christine N. Nalli	NO

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Modified Date	Completion Date
02/15/2023	Collaborate with HRD's Recruitment Team on events and efforts for females.	10/15/2025	
03/02/2023	Examine the Applicant Flow Data to determine whether women are applying and/or being selected.	05/25/2023	07/15/2023
03/13/2023	Develop a Recruitment and Outreach Plan identifying undergraduate, graduate schools and universities, summer internships and associations for women.	12/13/2025	
05/15/2023	Participate in HRD's Recruitment discussion and provide input.		05/15/2024
08/30/2023	Examine exit survey data to determine why females are leaving the Agency.	08/30/2024	09/30/2024
09/01/2023	Develop partnerships with colleges, universities that have a high percentage of women with mission critical skillsets.	09/01/2025	

Report of Accomplishments

FY	Accomplishments
2024	<p>In FY 2024, EEOP established its WWG to address actual and perceived barriers impacting women in the Agency. The group consists of a Champion, 2 Co-Chairs, 2 technical experts for EEOP and HRD, and 20 enthusiastic volunteers eager to identify and address the root causes of the low representation of women in the Agency. The group examined the Agency's recruitment and outreach, career development, and Retention Programs.</p>
2023	<p>HRD Exit Survey Workgroup continued collaborating with EEOP on updates to the WHS employee exit interview. The survey was completed and administered to the workforce via MilSuite. To date, 50 employees have utilized the survey to provide feedback and reasons for leaving the Agency. Data from the exit survey will be captured and evaluated annually.</p> <p>EEOP held collaborative meetings with HRD to discuss HR/EEO-related activities, outreach opportunities and hiring strategies for the female workforce.</p> <p>EEOP continued to analyze the workforce data, which identifies various triggers within WHS, including triggers for new hires, separations, mission-critical occupations, and awards.</p> <p>EEOP developed a list of undergraduate, graduate schools and universities, summer internships, and associations. These schools and institutions will be included in HRD's recruitment and outreach efforts for FY 2024.</p>

MD-715 – Part I

Agency EEO Plan to Eliminate Identified Barrier

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

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

HISPANIC WORKFORCE

Statement of Condition that was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Hispanic Workforce	Table A1, A8 and A16	<p>Overall, the Agency Hispanic total workforce representation in FY 2024 for males was 326 (3.95%), an increase of 0.60% compared to FY 2023, and females was 173 (2.10%) with an increase of 0.08% compared to FY 2023. The representation of the Hispanic males and females is significantly lower than their respective CLFs of males 6.82%, and females 6.16%.</p> <p>The permanent Hispanic workforce in FY 2024 consisted of 245 (3.76%) for males and 139 (2.13%) for females. The permanent workforce Occupational categories for Hispanic males was broken down as follows: Executives 6 (2.84%); Supervisors 20 (3.50%); Professionals 53 (3.08%); Technicians 3 (3.57%); and Administrative Workers 0 (0.00%). The permanent workforce Hispanic females are broken down as follows: Executives 2 (0.95%); Supervisors 7 (1.23%); Professionals 35 (2.03%); Technicians 1 (1.19%); and Administrative Workers 0 (0.00%).</p> <p>New Hires: The Agency's permanent workforce hired 672 employees, 14 (2.08%), a decrease of 1.72% compared to FY 2023. The Hispanic male's permanent workforce was 14 (2.08%), a decrease of 1.72% compared to FY 2023. The Hispanic female's permanent workforce was 10 (1.49%), a decrease of 1.40% compared to FY 2023. Both Hispanic males below the CLF of 6.82% and Hispanic females below the CLF of 6.16%.</p> <p>Separation: Forty Hispanics separated in FY 2024. Separation of Hispanic males was at 27 (3.46%), below the CLF of 6.82%. Of the 294 females who separated from the Agency, 13 (1.67%) were Hispanics, which was below the CLF of 6.16%. Both males and females are below the respective CLF.</p>
Senior Executive Service	Table A4	<p>The participation rate of Hispanic males in the SES was 9 (3.11%), and Hispanic females 2 (0.69%).</p> <p>Senior-grade level Hispanic participation rates were as follows: Males GS-14, 33 (3.39%), a decrease of 0.29% compared to FY 2023.</p>

		<p>GS-15, 39 (2.99%), an increase of 0.07% compared to FY 2023. SES, 9 (3.11%), an increase of 0.55% compared to FY 2023.</p> <p>Hispanic Females GS-14, 27 (2.77%), a decrease of 0.30% compared to FY 2023. GS-15, 19 (1.46%), a decrease of 0.56% compared to FY 2023. SES, 2 (0.69%) Hispanic female representation in the SES workforce.</p> <p>The Hispanic male workforce shows there are 4 (3.74%) Hispanic Males in GS-09, 0 (0.00%) at GS-10, and 8 (3.77%) in the GS-11 positions. The Hispanic Female workforce shows there are 3 (2.80%), at the GS-9, 0 (0.00%) at GS-10, and 6 (2.83%) at GS-11 positions.</p> <p>The Hispanic males 130 (3.24%) and 100 Hispanic males were in the GS-13 to GS-15 grades level, placing them in the SES pipeline. During FY 2023, there was a 0.49% increase in Hispanic male representation within GS-13 to GS-15 positions.</p> <p>A majority of Hispanic female 88 (2.19%) of the 69 permanent Hispanic females were in the GS-13 and GS-15 grade levels, placing them in the SES pipeline.</p>
Major Occupation	Table A6	Hispanic males are well below the Occupational Civilian Labor Force (OCLF) of all major occupations. Hispanic females are below major occupations except for 0343 (Management and Program Analysis) and 2210 (Information Technology).

EEO Group(s) Affected by Trigger

EEO Group
Hispanic or Latino Males
Hispanic or Latino Females

Barrier Analysis Process

Sources of Data	Source Reviewed? (YES or NO)	Identify Information Collected
Workforce Data Tables	YES	Examined the FY 2024 workforce data.
Complaint Data (Trends)	YES	Of the 46 formal complaints filed, 2 were Hispanic.
Grievance Data (Trends)	YES	In FY 2024, 101 grievances were filed, of which 1 was Hispanic male. Compared to FY 2023, out of 23 grievances filed, 6 were Hispanic males.
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	YES	In FY 2024, there were 29 Anti-Harassment claims, of which 1 was Hispanic female.
Climate Assessment Survey (e.g., FEVS)	YES	In FY 2024, EEOP facilitated 19 Climate Assessment Surveys.
Exit Interview Data	NO	173 surveys were completed, representing a 23% percent response rate. No RNO data was captured and analyzed in FY 2024.
Focus Groups	NO	
Interviews	NO	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	NO	
Other (Please Describe)	NO	

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (YES or NO)	Barrier(s) Identified? (YES or NO)
NO	NO

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice

The Agency will work to increase the low representation of Hispanics.¹² In FY 2025, EEOP, with the support of HRD, will work to identify potential barriers to their representation in the OCLF.

Objective(s) and Dates for EEO Plan

Objective	Date Initiated	Target Date	Sufficient Funding and Staffing? (YES or NO)	Modified Date	Date Completed
Identify and address potential barriers within the Hispanic workforce.	10/01/2022	10/01/2024	YES	12/10/2025	
Develop an outreach/recruitment plan to identify strategies to improve for Hispanic representation.	05/01/2022	05/01/2024	YES	10/30/2024	12/31/2024
Utilize DefenseReady as a mechanism to track information on Agency vacancies, to include recruitment as available.	07/01/2022	07/01/2024	YES	12/30/2025	
Analyze separation data to evaluate and explore the correlation between length of service and separation.	10/01/2022	10/01/2024	YES	12/30/2025	

¹² This plan is required and relevant to deficiencies noted by EEOC. However, the Agency will comply with the Presidential Memorandum and Executive Order.

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (YES or NO)
Director, EEOP	Pamela R. Sullivan	NO
Chief/HRD	Christine N. Nalli	NO

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Modified Date	Completion Date
07/01/2022	Utilize DefenseReady as a mechanism to track information of Agency vacancies to include recruitment as available.		05/15/2023
05/01/2022	Develop and implement a recruitment plan and monitor results such as applicant flow data.	12/31/2025	
10/01/2022	Continue to analyze separation data and explore correlation between length of service and separation.		09/30/2024
12/31/2022	Obtain Nature of Action Code for separation and review to determine why Hispanics are leaving the Agency.	12/31/2025	

Report of Accomplishments

	Accomplishments
FY 2024	<p>PFPA activities involving Hispanics: All Heritage and Awareness events were planned by a team of employees, and attendance was open to all employees.</p> <p>Strategic activities or actions the Agency is implementing, or will implement, to address the low representation and retention include collecting applicant flow data to identify and address barriers to employment and promotion.</p> <p>PFPA/Human Capital Management Division (HCPMD) and Recruiting Medical Fitness Division (RMFD) began building relationships with universities, professional organizations, and communities for targeted recruiting efforts.</p> <p>In FY 2024, PFPA/RMFD focused on targeting colleges and Law Enforcement Organization Annual training events and seminars for recruiting efforts.</p>
FY 2023	<p>PFPA/HCPMD and RMFD built relationships with universities, professional organizations, and communities for targeted recruiting efforts.</p> <p>WHS planned to participate in upcoming virtual conferences and career expos.</p>

MD-715 – Part J

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

To capture agencies' Affirmative Action Plan for PwDs and PwTDs, EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

Section I: Efforts to Reach Regulatory Goals

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

1. Using the goal of 12% 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 (PwDs) Yes No ☒
 - b. Cluster GS-11 to SES (PwDs) Yes No ☒

The percentage of PwDs in the GS-1 to GS-10 cluster was 17.39%, and the rate of PwDs in the GS-11 to SES was 14.34%, which exceeds the goal of 12%.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PwTDs 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 (PwTDs) Yes No ☒
 - b. Cluster GS-11 to SES (PwTDs) Yes No ☒

The percentage of PwTDs in the GS-1 to GS-10 cluster was 2.42%, and the PwTDs in the GS-11 to SES was 2.55%, exceeding the goal of 2%.

Grade Level Cluster (GS or Alternate Pay Plan B)	Total Number	Reportable Disability #	Reportable Disability %	Targeted Disability #	Targeted Disability %
Numerical Goal		12%	12%	2%	2%
Grades GS-1 to GS 10	207	36	17.39	5	2.42
Grades GS-11 to SES	3804	546	14.35	97	2.55

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

WHS utilized various methods, including training (HR and Leadership for New Supervisors; annual EEO and Engagement Training), quarterly newsletters, quarterly leadership meetings, and the annual policy.

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 AND COMPETENT STAFFING FOR THE DISABILITY PROGRAM

- Has the agency designated sufficient qualified personnel to implement its Disability Program during the reporting period? If “no,” describe the agency’s plan to improve the staffing for the upcoming year.

Yes No ☒ X

The Agency hired a new PM who will oversee the Disability Program.

- Identify all staff responsible for implementing the agency’s Disability Employment Program by the office, staff employment status, and responsible official.

Number of FTE Staff by Employment Status

Disability Program Task	Full Time	Part Time	Collateral Duty	Responsible Official (Name, Title, Office, Email)
Processing applications from PwDs and PwTDs	0	0	2	Marie V. Palisoc, HR Specialist Disability Recruitment marie.v.palisoc.civ@mail.mil
Answering questions from the public about hiring authorities that take disability into account	0	0	2	Marie V. Palisoc, HR Specialist Disability Recruitment marie.v.palisoc.civ@mail.mil
Processing reasonable accommodation requests from applicants and employees	2	0	2	Tara D. Bennett-Howard RA Program Manager tara.d.bennett-howard.civ@mail.mil
Section 508 Compliance	1	0	4	Tapan M. Suthar, Section 508 Program Manager tapan.m.suthar.civ@mail.mil

Disability Program Task	Full Time	Part Time	Collateral Duty	Responsible Official (Name, Title, Office, Email)
Architectural Barriers Act Compliance	1	0	0	WHS.Accessibility@mail.mil
Special Emphasis Program for PwDs and PwTDs	3	0	3	Marie V. Palisoc, HR Specialist Disability Recruitment marie.v.palisoc.civ@mail.mil

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.

Yes No X

Currently, the Agency does not provide disability training. In FY 2025, the Agency will satisfy this requirement.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

1. Has the Agency provided sufficient funding and other resources to successfully implement the Disability Program during the reporting period? If “no,” describe the agency’s plan to ensure all aspects of the Disability Program have sufficient *funding* and other *resources*.

Yes No X

Currently, the Program is using alternate resources to provide the information necessary to supplement funding. In FY 2025, HRD will review funding requirements.

Section III: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

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

To assist job applicants with disabilities and targeted disabilities, WHS engaged in various outreach activities. In addition to extensive Outreach Programs, WHS also sought out PwDs and PwTDs through various Programs (i.e., WRP, Schedule A, and Operation Warfighter) and hiring events. These Programs’ information has been spotlighted in HRD newsletters for Defense Agencies and DoD Field Activities and OSD organizations.

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 PwDs and PwTDs for positions in the permanent workforce.

Specific statement in vacancy announcements related to Special Appointing Authorities, to include Veterans with a disability rating of 30% or more, with links to informative webpages that further explain and clarify those appointment types. Continue the utilization of special hiring authorities and job Development Programs for Veterans, including Veterans with a disability rating of 30% or more. To this end, HRD will continue to educate hiring managers on special appointing authority for 30% or more disabled Veterans. Additionally, WHS will seek to include Veteran employees with disabilities as recruitment and outreach consultants.

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.

1) The assigned HR Specialist will determine if the individual is eligible for appointment under Schedule A, 5 C.F.R. 213.3102(u) by reviewing documentation of the disability. This documentation is obtained from a medical professional, a licensed vocational rehabilitation specialist, or a Federal/State agency that issues or provides disability benefits. 2) Careful consideration is taken when forwarding the individual's application to the relevant hiring official. A discussion with the hiring official is held to educate them on the use and ease of the Schedule A hiring authority. Job announcements also include PwDs as an area of consideration and if qualified, are referred. There are instances when hiring managers will come to us with an ideal candidate who is eligible for the Schedule A hiring authority. In this situation, we review the applicant's resume and disability documentation and process a personnel action to onboard the person.

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

Yes ☒ No ☐ N/A ☐

WHS utilized various of methods to include Training (HR and Leadership for New Supervisors; annual EEO Training), a quarterly newsletter, and a quarterly Leadership meeting. SEP provides information on hiring authority to hiring managers during the Strategic Recruitment discussion.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

The Agency SEP employees maintained virtual relationships with vocational rehabilitation offices, state employment offices, Veterans' organizations, colleges/universities, and other facilities to obtain applications from disabled Veterans. They participated in a DoD-wide recruiter's consortium to share ideas and information to improve recruitment efforts.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

a. New Hires for Permanent Workforce (PwDs)	Yes	X	No
b. New Hires for Permanent Workforce (PwTDs)	Yes	X	No

In FY 2024, the Agency hired 60 employees who reported having a disability and 9 who reported having a targeted disability. PwTDs comprised 1.34% of the workforce of WHS and serviced Components. Employees with reportable disabilities were 8.93% of the total workforce, compared to 6.95% at the end of FY 2023. WHS continues to work closely with Gallaudet University, other major local universities, and disability interest institutions in the National Capital Region. WHS attends prioritized events focused on disabled Veterans and people with targeted disabilities, including the Hiring Our Heroes career event.

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

a. New Hires for MCO (PwDs)	Yes	X	No
b. New Hires for MCO (PwTDs)	Yes	X	No

Using the qualified applicant pool as a benchmark trigger existed for PwDs and PwTDs new hires in the following most populous MCOs:

Series 0080: PwDs 11.36%; PwTDs 2.27%
Series 0083: PwDs 4.21%; PwTDs 1.87%
Series 0301: PwDs 3.20%; PwTDs 2.59%
Series 0343: PwDs 6.98%; PwTDs 2.33%
Series 1102: PwDs 10.00%, PwTDs 3.57%
Series 2210: PwDs 6.40%; PwTDs 1.60% (*Table B6*)

3. Using the relevant applicant pool as the benchmark, do triggers exist for PwDs and/or PwTDs among the qualified *internal* applicants for any of the MCO? If “yes,” please describe the triggers below.

a. Qualified Applicants for MCO (PwDs)	Yes	X	No
b. Qualified Applicants for MCO (PwTDs)	Yes	X	No

Using the qualified applicant pool as a benchmark trigger existed for PwDs and PwTDs internal competitive promotion in the following most populous MCOs:

- Series 0080: PwDs 10.26%; PwTDs 7.96%
- Series 0083: PwDs 7.33%; PwTDs 4.00%
- Series 0130: PwDs 5.88%, PwTDs 0.00%
- Series 0301: PwDs 9.12%, PwTDs 4.95%
- Series 0343: PwDs 8.04%, PwTDs 5.71.
- Series 1102: PwDs 8.99%, PwTDs 5.41%
- Series 2210: PwDs 7.48%, PwTDs 6.12% (*Table B6*)

4. Using the qualified applicant pool as the benchmark, do triggers exist for PwDs and/or PwTDs among employees promoted to any of the MCO? If “yes,” please describe the triggers below.

- | | | |
|-------------------------------|-------|----|
| a. Promotions for MCO (PwDs) | Yes X | No |
| b. Promotions for MCO (PwTDs) | Yes X | No |

In comparison to the benchmarks, triggers exist among the selections for promotion involving the following positions in FY 2024.

0080 – Security: PwDs (0.00%) and PwTDs (0.00%)

0083 – Police Officer: PwDs (6.67%) and PwTDs (0.00%)

0130 – Foreign Affairs: PwDs (0.00%) and PwTDs (0.00%)

0301 – Miscellaneous Administration and Program: PwDs (4.88%) and PwTDs (4.88%)

0343 – Management and Program Analyst: PwDs (3.57%) and PwTDs (0.00%)

1102 – Contracting: PwDs (3.03%) and PwTDs (0.00%)

2210 – Information Technology: PwDs (0.00%) and PwTDs (0.00%) *Table B6*

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

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

A. ADVANCEMENT PROGRAM PLAN

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

The SEP endeavors to place PwDs and PwTDs employees in billets that have promotion potential, when possible. Managers are encouraged to provide PwDs and PwTDs employees training for promotion to the next highest grade. HRD works with the Section 508 coordinator to ensure that PwDs and PwTDs employees are provided with appropriate accessible technology to enable them to perform the essential functions of their jobs and participate in training and development opportunities.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

WHS has a standard training budget that allows employees to explore opportunities within or to stretch outside their functional area. Additionally, over 4,000 online courses are available through iCompass. Detail opportunities are encouraged. WHS also offers Competitive Leader Development Programs, including assessment tools, leadership development workshops (Leading at the Speed of Trust), assessment tools (Myers Briggs, StrengthsFinder, and Benchmark 360 surveys), executive coaching, and Competitive Leader Development Programs. These include the Executive Leadership Development Program, White House Leadership Program, WHS Aspiring Leader Program, and the Key Executive Leadership Certificate Program, among others. WHS informs employees of OPM-negotiated tuition reduction partnerships with post-secondary institutions.

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 Applicants(#)	Total Participants Selectees (#)	PwDs Applicants (%)	PwDs Selectees (%)	PwTDs Applicants (%)	PwTDs Selectees (%)
Internship Programs						
Fellowship Programs						
Mentoring Programs						
Coaching Programs	40	40				
Training Programs						
Detail Programs						
Other Career Development Programs						

3. Do triggers exist for PwDs among the applicants and/or selectees for any of the Career Development Programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees). If “yes”, describe the trigger(s) in the text box.
- a. Applicants (PwDs) Yes X No N/A
- b. Selections (PwDs) Yes X No N/A

In FY 2024, triggers may exist for PwDs in all Career Development Programs.

4. Do triggers exist for PwTDs among the applicants and/or selectees for any of the Career Development Programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.
- a. Applicants (PwTDs) Yes X No N/A
- b. Selections (PwTDs) Yes X No N/A

In FY 2024, triggers may exist for PwTD in all Career Development Programs.

C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PwDs and/or PwTDs 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, and Incentives (PwDs) | Yes | X | No |
| b. Awards, Bonuses, and Incentives (PwTDs) | Yes | X | No |

Triggers were identified for the following awards:

- **Cash awards \$3,000 and \$3,999:** The average award amount for PwDs (11.16%) and PwTDs (1.09%) is lower than that for all recipients.
- **Cash awards greater than \$5,000:** The average award amount for PwDs (10.22%) and PwTDs (1.40%) is lower than the average for all recipients. (*Table B13*)

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

- | | | | |
|--------------------------|-----|----|----|
| a. Pay Increases (PwDs) | Yes | No | X |
| b. Pay Increases (PwTDs) | Yes | X | No |

Triggers were identified for the following QSIs:

- Thirty-four (9.66%) PwDs and 3 (0.85%) PwTDs received QSIs. PwDs and PwTDs are significantly lower than the average award amount for all recipients.

Triggers were identified for the following performance-based pay increases:

- Sixty-four (9.07%) PwDs and 8 (1.13%) PwTDs received performance-based pay increases: PwDs and PwTDs are significantly lower than the average award amount for all recipients. (*Table B13*).

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

- | | | | | |
|---------------------------------------|-----|----|-----|---|
| a. Other Types of Recognition (PwDs) | Yes | No | N/A | X |
| b. Other Types of Recognition (PwTDs) | Yes | No | N/A | X |

WHS did not have any other types of Recognition Programs during FY 2024.

D. PROMOTIONS

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

- a. SES

- | | | | |
|---|-----|---|----|
| i. Qualified Internal Applicants (PwDs) | Yes | X | No |
| ii. Internal Selections (PwDs) | Yes | X | No |

- b. Grade GS-15

- | | | | |
|---|-----|---|----|
| i. Qualified Internal Applicants (PwDs) | Yes | X | No |
| ii. Internal Selections (PwDs) | Yes | X | No |

- c. Grade GS-14

- | | | | |
|---|-----|---|----|
| i. Qualified Internal Applicants (PwDs) | Yes | X | No |
| ii. Internal Selections (PwDs) | Yes | X | No |

- d. Grade GS-13

- | | | | | |
|---|-----|--|----|---|
| i. Qualified Internal Applicants (PwDs) | Yes | | No | X |
| ii. Internal Selections (PwDs) | Yes | | No | X |

Relevant applicant pool data is not available. PwDs Qualified Internal Applicants by Senior Grade are as follows:

SES – 0.00%
 GS-15 – 10.43%
 GS-14 – 9.12%
 GS-13 – 6.67% (*Table B11*)

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

a. SES

i. Qualified Internal Applicants (PwTDs)	Yes	X	No
ii. Internal Selections (PwTDs)	Yes	X	No

b. Grade GS-15

i. Qualified Internal Applicants (PwTDs)	Yes	No	X
ii. Internal Selections (PwTDs)	Yes	No	X

c. Grade GS-14

i. Qualified Internal Applicants (PwTDs)	Yes	No	X
ii. Internal Selections (PwTDs)	Yes	No	X

d. Grade GS-13

i. Qualified Internal Applicants (PwTDs)	Yes	No	X
ii. Internal Selections (PwTDs)	Yes	No	X

Relevant applicant pool data is not available. PwTDs Qualified Internal Applicants by Senior Grade as follows:

SES – 0.00%
 GS-15 – 6.75%
 GS-14 – 5.82%
 GS-13 – 4.64%

Triggers were identified for selections of PwTDs within the SES, GS-15, and GS-14 levels.

SES – 0.00%
 GS-15 – 0.00%
 GS-14 – 0.00%
 GS-13 – 6.67% (*Table B11*)

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

a. New Hires to SES (PwDs)	Yes X	No
b. New Hires to GS-15 (PwDs)	Yes X	No
c. New Hires to GS-14 (PwDs)	Yes X	No
d. New Hires to GS-13 (PwDs)	Yes X	No

Based on a review of MD-715 B-15 Senior Grade Level (New Hires), WHS identified triggers for PwDs new hires at the SES level when compared to the qualified applicant pool.

SES – 0.00%
 GS-15 – 0.00%
 GS-14 – 4.83%
 GS-13 – 11.89%

Triggers were identified for selections of PwDs within the SES, GS-15, and GS-14 levels.

SES – 0.00%
 GS-15 – 0.00%
 GS-14 – 0.00%
 GS-13 – 25.00% (*Table B15*)

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

a. New Hires to SES (PwTDs)	Yes X	No
b. New Hires to GS-15 (PwTDs)	Yes X	No
c. New Hires to GS-14 (PwTDs)	Yes X	No
d. New Hires to GS-13 (PwTDs)	Yes X	No

Based on a review of MD-715 B-15 Senior Grade Level (New Hires), WHS identified triggers for PwTDs new hires at the SES level when compared to the qualified applicant pool.

SES – 0.00%
 GS-15 – 0.00%
 GS-14 – 1.38%
 GS-13 – 4.90%

Triggers were identified for selections of PwDs within the SES, GS-15, GS-14, and GS-13 levels.

SES – 0.00%
 GS-15 – 0.00%
 GS-14 – 0.00%
 GS-13 – 0.00% (*Table B15*)

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

a. Executives

i. Qualified Internal Applicants (PwDs)	Yes	X	No
ii. Internal Selections (PwDs)	Yes	X	No

b. Managers

i. Qualified Internal Applicants (PwDs)	Yes	X	No
ii. Internal Selections (PwDs)	Yes	X	No

c. Supervisors

i. Qualified Internal Applicants (PwDs)	Yes	X	No
ii. Internal Selections (PwDs)	Yes	X	No

When reviewing the internal qualified applicants and selections, triggers were identified for PwDs in the Executive, Manager, and Supervisor categories.

PwDs Executive Qualified Applicant: 10.56%	Selections: 0.00%
PwDs Manager Qualified Applicant: 10.75%	Selections: 10.00%
PwDs Supervisor Qualified Applicant: 11.76%	Selections: 0.00% (<i>Table B19</i>)

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

a. Executives

- | | | | |
|--|-----|----|----|
| i. Qualified Internal Applicants (PwTDs) | Yes | No | X |
| ii. Internal Selections (PwTDs) | Yes | X | No |

b. Managers

- | | | | |
|--|-----|----|----|
| i. Qualified Internal Applicants (PwTDs) | Yes | No | X |
| ii. Internal Selections (PwTDs) | Yes | X | No |

c. Supervisors

- | | | | |
|--|-----|----|----|
| i. Qualified Internal Applicants (PwTDs) | Yes | No | X |
| ii. Internal Selections (PwTDs) | Yes | X | No |

When reviewing the internal qualified applicants and selections, triggers were identified for PwTDs in the Executives, Managers, and Supervisors categories.

PwTDs Executive Qualified Applicant:	6.83%	Selections:	0.00%
PwTDs Manager Qualified Applicant:	5.91%	Selections:	0.00%
PwTDs Supervisor Qualified Applicant:	8.82%	Selections:	0.00% (<i>Table B19</i>)

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

- | | | | |
|-------------------------------------|-----|---|----|
| a. New Hires for Executives (PwDs) | Yes | X | No |
| b. New Hires for Managers (PwDs) | Yes | X | No |
| c. New Hires for Supervisors (PwDs) | Yes | X | No |

When reviewing the selections for PwDs compared to the qualified applicant pool benchmark, triggers were identified for PwDs in the categories of Executives, Managers, and Supervisors.

PwDs Executive Qualified External Applicants:	10.47%	Selections:	0.00%
PwDs Manager Qualified External Applicants:	5.68%	Selections:	0.00%
PwDs Supervisor Qualified External Applicants:	2.08%	Selections:	0.00% (<i>Table B18</i>)

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PwTDs among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box.
 - a. New Hires for Executives (PwTDs) Yes ☒ No
 - b. New Hires for Managers (PwTDs) Yes ☒ No
 - c. New Hires for Supervisors (PwTDs) Yes ☒ No

When reviewing the selections for PwTDs compared to the qualified applicant pool benchmark, triggers were identified for PwTDs in the Executives, Managers, and Supervisors categories.

PwTDs Executive Qualified External Applicants: 8.14% Selections: 0.00%
 PwTDs Manager Qualified External Applicants: 2.27% Selections: 0.00%
 PwTDs Supervisor Qualified External Applicants: 2.08% Selections: 0.00% (*Table B18*)

Section V: Plan to Improve Retention of Persons with Disabilities

To be a model employer for PwDs 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 RA Program and workplace personal assistance services.

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after 2 years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If “no,” please explain why the agency did not convert all eligible Schedule A employees.

Yes No ☒ N/A

There were 3 Schedule A employees hired in FY 2024. None have been converted to competitive service, and all remain in excepted service.

2. Using the inclusion rate as the benchmark, did the percentage of PwDs among voluntary and involuntary separations exceed that of persons without disabilities? If “yes,” describe the trigger below.
 - a. Voluntary Separations (PwDs) Yes ☒ No
 - b. Involuntary Separations (PwDs) Yes ☒ No

In FY 2024, 11.67% of PwDs separated the Agency. For PwDs, there were 42.86% removal, 4.70% resignation, and 17.19% retirement (*Table B16*).

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

a. Voluntary Separations (PwTDs)	Yes	No X
b. Involuntary Separations (PwTDs)	Yes X	No

The Agency had 2.18% of PwTDs separated from the Agency. For PwTDs, there were 0.85% resignations and 1.95% retirement. (*Table B16*)

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

The Agency exit interview results do not explain why PwDs and PwTDs separated the Agency in FY 2024. In FY 2024, we have hired 17 Schedule A employees hired-to-date.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

For information about Section 508: <http://dodcio.defense.gov/DODSection508.aspx>. Complaints should be addressed to the DoD Office for Civil Rights and Equal Opportunity Policy – <http://diversity.defense.gov>.

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.

Individuals may visit <https://www.whs.mil/About-WHS/Offices/Equal-Employment-Opportunity-Programs-EEOP/EEO-Laws-and-Regulations/> for specific rights under the Architectural Barriers Act. Employees, contractors, and visitors may find information about filing a complaint at <https://www.whs.mil/Disclaimers/Facilities-Accessibility/>

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

Facility improvements include installing of new power-assisted doors in public corridors, both high and low water fountains in buildings, and improving of curb cuts at pedestrian crossings in parking lots. For digital technology accessibility, WHS has established a Section 508 Program and designated a team, including 2 Certified Trusted Testers. To increase compliance, section 508 consultations, training, testing, and resources are provided to WHS programs. Also, a Section 508 SharePoint site has been developed with resources, tools, and training to assist with WHS stakeholders' digital content remediation efforts.

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 timeframe 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.)

The average processing time and implementation of accommodation requests in FY 2024 was 7-15 days, which included receipt and review of medical documentation. Training of employees and supervisors has returned to full operations after the Coronavirus-19 pandemic. The RA Program is currently under the management of the LMER Division. However, the RAPM, the Assistant Director, LMER, and the ER team members are fully available to advise managers before, during, and following the RA process to ensure the effectiveness of an accommodation.

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.

WHS processes RA requests and approves accommodations within 30 days of receipt. RA training for managers and supervisors is integral to the following training: HR and Leadership for New Employee, and EEO and Engagement for Supervisors. The RAPM regularly monitors accommodation requests and advises leadership of any trends.

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

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

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing

approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

WHS has drafted a PAS policy as part of AI 114, currently in review. To date, WHS has processed no requests for PAS. Reasonable Accommodation Policy and Procedures, which included information on PAS policy and procedures, remain published and posted on the internal website as a resource to all managers and supervisors.

Section VI: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last FY, did a higher percentage of PwDs file a formal EEO complaint alleging harassment, as compared to the Government-wide average?

Yes No ☒ N/A

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

Yes No ☒ N/A

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

In FY 2024, there were no findings of discrimination due to harassment based on disability status.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last FY, did a higher percentage of PwDs file a formal EEO complaint alleging failure to provide a RA, as compared to the Government-wide average?

Yes No ☒ N/A

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

Yes No ☒ N/A

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

In FY 2024, there were no complaints alleging harassment based on disability status that resulted in a finding of discrimination or a settlement agreement.

Section VII: Identification and Removal of Barriers

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

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

Yes ☒ No

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

Yes ☒ No ☐ N/A ☐

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

Trigger 1	<p>Lower than expected representation of PwDs and PwTDs into Managerial Positions</p> <p>Table B3: Occupational Categories by Disability</p> <p>Trigger(s): Executive/Senior Level is below the goal of 12% for PwDs 14 (6.64%).</p> <p>Trigger(s): Executive/Senior Level is below the goal of 2% for PwTDs 1 (0.47%).</p> <p>Trigger(s): Out of 8 occupational categories, 4 are below the goal of 12% for PwDs.</p> <p>Professionals (10.75%), Technicians (11.90%), Craft Workers (5.95%), and Service Workers (4.10%).</p> <p>Five of the eight occupational categories are below the 2% goal for PwTDs. Professionals (1.74%), Technicians (1.19%), Craft Workers (1.19%), Operatives (1.43%) and Service Workers (0.87%).</p>
Trigger 2	<p>Table B4: General Schedule (GS) Grades by Disability</p> <p>Trigger(s): GS-14 cluster (123 employees) is below the PwDs 12% goal at 0.13%.</p> <p>Trigger(s): GS-15 cluster (139 employees) is below the PwDs 12% goal at 0.11%.</p> <p>Trigger(s): SES cluster (18 employees) is below the PwDs 12% goal at 6.23%.</p> <p>Trigger(s): GS-14 cluster (20 employees) is below the PwTDs 2% goal at 0.02%.</p> <p>Trigger(s): SES cluster (one employee) is below the PwTDs 2% goal at 0.35%.</p>
Trigger 3	<p>Table B6: Mission-Critical Occupations by Disability</p>

	Trigger(s): PwDs is below the 12% goal in the 0083, 0130, and 1102 series. Trigger(s): PwTDs is below the 2% goal in the 0083, 0130, and 1102 series.	
Trigger 4	There are triggers regarding New Hires for PwDs and PwTDs at the senior grade level.	
Barrier(s)	No barrier has been identified.	
Objective(s)	Increase outreach and recruitment efforts for PwDs and PwTDs in the senior grade levels.	
Responsible Official(s)	Performance Standards Address the Plan? (YES or NO)	
Pamela R. Sullivan, Director, EEOP	NO	
Marie V. Palisoc, Supervisor SEP Branch, HRD	NO	
Barrier Analysis Process Completed? (YES or NO)	Barrier(s) Identified? (YES or NO)	
NO	YES	
Sources of Data	Sources Reviewed? (YES or NO)	Identify Information Collected
Workforce Data Tables	YES	Table B3: Occupational Categories by Disability; Table B4: GS Grades by Disability, Table B6: Mission Critical Occupations by Disability
Complaint Data (Trends)	YES	Of 46 formal complaints filed, 14 were PwDs and 0 PwTDs.
Grievance Data (Trends)	YES	In FY 2024, 101 grievances were filed, with 11 employees identified as having a disability. There were two with a PwTDs.
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	YES	In FY 2024, there were 101 Anti-Harassment claims, of which 12 were PwDs and 2 with PwTDs.
Climate Assessment Survey (e.g., FEVS)	YES	
Exit Interview Data	NO	There were 173 completed FY 2024; No RNO data was captured.
Focus Groups	NO	
Interviews	NO	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	NO	
Other (Please Describe)	NO	

Target Date	Planned Activities	Sufficient Staffing and Funding (YES or NO)	Modified Date	Completion Date
09/30/2022	Review PAS instructions for WHS agency	YES		09/30/2022
05/31/2023	Establish Disability Working Group	YES		05/31/2023
06/01/2023	Update the EEO external website to include 504/508 complaint information in the Disability Outreach section.	YES		09/15/2024
08/30/2023	Collaborate with HRD to identify whether triggers exist within the Career Development Program for PwDs and PwTDs.	YES	11/27/2025	
9/30/2023	Collaborate with HRD on Disability Newsletter for WHS Agency	YES		09/30/2024
9/30/2023	Collaborate with HRD to create a drive for WHS employees to update their SF 256	YES		12/31/2023

FY	Accomplishments
2024	<p>WHS has drafted a PAS policy as part of AI 114, currently in review. To date, WHS has processed no requests for PAS. RA Policy and Procedures, which included information on PAS policy and procedures, remain published and posted on the internal website as a resource to all managers and supervisors.</p> <p>The DWG continued to make great strides in the Recruitment and Outreach Group. The Group has developed a Schedule A fact sheet to provide applicants with information regarding Schedule A. A list of resources was also developed to establish partnership with DARS and the Virginia Department of the Blind and Vision Impaired.</p> <p>Also, a list of the following schools, colleges and universities were identified for FY 2025:</p> <ol style="list-style-type: none"> 1. Gallaudet University, Washington D. C. 2. <u>Co-op/Job Postings National Technical Institute for the Deaf/RIT</u> 3. NOVA – Northern Virginia 4. Austin Community College 5. University of Texas 6. California State University, Northridge 7. Southwest Collegiate Institute of the Deaf 8. National Association for the Deaf – <u>Current home</u>. <p>PFPA/HCPMD and RMFD will begin building relationships with Hispanic universities, professional organizations, and communities for targeted recruiting efforts.</p>

<p>2023</p>	<p>In FY 2023, WHS established a DWG. An SES Champion leads the group and there are 10 volunteers. The group has incorporated EEOC's recommendation as its FY 2024 Strategic Goals and Objectives. The following four goals are also the working group focus:</p> <ol style="list-style-type: none"> 1. Recruitment and Outreach 2. Career Development 3. Marketing and Communication 4. Data Analysis <p>EEOP continued its collaboration with HRD and WHS-serviced Components on the benefits and value of SEPs and OPM resources (i.e., Feds Hire Vets website and the Bender list information) to recruit, hire, and retain disabled Veterans and underrepresented groups. HRD engaged with hiring managers, Customer Account Managers, and WHS-serviced Components to provide guidance, training, and awareness of special hiring authorities, including Veterans Recruitment Appointment, Veterans Employment Opportunities Act, Schedule A, and other competitive hiring authorities. In FY 2024, SEP continued to promote Schedule A Hiring Authority and the WRP to their customers. SEP on boarded six WRP students.</p> <p>The RA Coordinator continued to provide RA guidance and training to allow PwDs to apply for jobs, perform job functions, and enjoy equal access to benefits to advance within the Agency. WHS actively promoted RA awareness to supervisors and the workforce during customer-focus forums, town halls, leadership meetings, EEO trainings, and SEDS.</p> <p>In addition, the RA continued to provide mandatory disability training to managers, supervisors, and LMER, as requested, and one-on-one consultation support to managers and employees.</p>
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4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

Lack of personnel and resources.

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

The Agency has not had sufficient time to assess the impact of the planned activities.

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

The Agency has not had sufficient time to assess the impact of the planned activities.