

# Management Directive 715 (MD-715)

## FY 2022 Status Report and FY 2023 Plan



**WASHINGTON HEADQUARTERS SERVICES**

4800 Mark Center Drive  Alexandria VA 22350-3400

**EEOC MANAGEMENT DIRECTIVE 715:  
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

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Washington Headquarters Services (WHS) and WHS-Serviced Components

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**For period covering October 1, 2021 to September 30, 2022**

**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	4,609	703	5,312

**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

**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 Equal Employment Opportunity (EEO) Director/Official	Pamela R. Sullivan	EEO Director	GS-260	15	571-372-2222	pamela.r.sullivan2.civ@mail.mil
Affirmative Employment Program (AEP) Manager	James Parker	AEP Manager	GS-260	14	571-372-0844	james.a.parker290.civ@mail.mil
Complaint Processing Program Manager	Patrick Anderson	Complaints Manager	GS-260	14	571-372-0846	patrick.anderson8.civ@mail.mil
Diversity and Inclusion (D&I) Officer	James Parker	D&I Officer	GS-260	14	571-372-0844	james.a.parker290.civ@mail.mil

<b>EEOP Staff</b>	<b>Name</b>	<b>Title</b>	<b>Series</b>	<b>Pay Plan and Grade</b>	<b>Phone Number</b>	<b>Email Address</b>
Disability Program Manager	Dr. Edna Johnson	Disability Program Manager	GS-201	13	571-372-4034	edna.e.johnson6.civ@mail.mil
Special Placement Program Coordinator (Individuals with Disabilities (IwDs))	Ericka Deas-Johnson	Special Employment Program (SEP) Branch, Supervisor	GS-201	14	571-372-4092	ericka.deas.johnson.civ@mail.mil
Reasonable Accommodation (RA) Program Manager	Dr. Edna Johnson	Disability Program Manager	GS-201	13	571-372-4034	edna.e.johnson6.civ@mail.mil
Anti-Harassment Program (AHP) Manager	Adria Bullock	AHP Manager	GS-201	12	703-380-0718	adria.n.bullock.civ@mail.mil
Alternative Dispute Resolution (ADR) Program Manager	James Parker	ADR Program Manager	GS-260	14	571-372-0844	james.a.parker290.civ@mail.mil
Compliance Manager	Patrick Anderson	Compliance Manager	GS-260	14	571-372-0839	patrick.anderson8.civ@mail.mil
Principal MD-715 Preparer	Denise Lewis	EEO Specialist	GS-260	13	571-372-0846	denise.a.lewis12.civ@mail.mil

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

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

<b>Subordinate Component</b>	<b>City</b>	<b>State</b>	<b>Agency Code</b>	<b>FIPS Codes</b>
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	Arlington	VA	DD23	8840

Subordinate Component	City	State	Agency Code	FIPS Codes
(OLDCC)				
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	DD58	8840
Pentagon Force Protection Agency (PFPA)	Arlington	VA	DD65	8840
Defense Test Resources Management Center (DTRMC)	Arlington	VA	DD68	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	
Reasonable Accommodation Procedures	YES	
Personal Assistance Services Procedures	YES	
Alternative Dispute Resolution Procedures	YES	

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

Did the agency submit the following optional documents?	Please respond Yes or No	Comments
Federal Equal Opportunity Recruitment Program (FEORP) Report	YES	
Disabled Veterans Affirmative Action Program (DVAAP) Report	YES	
Operational Plan for Increasing Employment of Individuals with Disabilities under Executive Order 13548	NO	
Diversity and Inclusion Plan under Executive Order 13583	NO	

<b>Did the agency submit the following mandatory documents?</b>	<b>Please respond Yes or No</b>	<b>Comments</b>
Diversity Policy Statement	YES	
Human Capital Strategic Plan	NO	
EEO Strategic Plan	NO	
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	YES	

**EXECUTIVE SUMMARY**

**Part E.1 - Executive Summary: Mission**

**AGENCY MISSION**

WHS is the essential services provider for the OSD, Department of Defense (DoD) agencies, and 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 for delivering essential administrative services to fulfill the mission of the Department. In 2021, WHS was aligned under the day-to-day direction of the re-established Director of Administration and Management (DA&M).

WHS services are organized into several directorates and specialty offices. These teams support the mission of our Defense Department 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.

WHS delivers essential administrative services to assist these components and offices in fulfilling the DoD's mission. Under the leadership of Director, Regina F. Meiners, WHS supports the establishment of a model equal employment opportunity (EEO) Program, as required by the U.S. EEOC, under MD-715. This Report covers WHS and Components serviced by WHS.

**EQUAL EMPLOYMENT OPPORTUNITY PROGRAM MISSION**

The mission of the Office of Equal Employment Opportunity Programs (EEOP) is to foster an inclusive and respectful workplace environment that allows all personnel to succeed as they support the defense of our Nation. Our goals complement the strategic goals of our organization.

EEOP is responsible for the implementation of the Civilian EEO Process, information and referral services for the Military Equal Opportunity process, AEP, ADR Program, and D&I initiatives. The current staff consists of an EEOP Director, 2 Program Managers, 11 EEO specialists, and 2 EEO Assistant.

## Part E.2 - Executive Summary: Essential Element A - F

### MAJOR ACTIVITIES AND ACCOMPLISHMENTS

The following six essential elements of a Model Equal Employment Opportunity Program compose the Agency's EEO program and several noteworthy accomplishments in Fiscal Year 2022 (FY 2022).

#### **ELEMENT 1: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP:**

**EEO Policies and Procedures Communicated to the Workforce:** The WHS disseminated five Agency-wide EEO policy statements: EEO and Diversity, Prevention of Harassment, Employment and Retention of People with Disabilities, Federal Employee Anti-discrimination and Retaliation Act (No FEAR Act), and ADR policies were timely reissued and distributed to the workforce during EEO, Anti-Harassment, and Diversity Training. The DARPA disseminated Agency-wide EEO policy statements and posted on 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 Appropriate Conduct in the Workplace training.

**Diversity, Equity, Inclusion and Accessibility (DEIA):** PFPA created a diverse DEIA Working Group (WG), comprised of PFPA employees at all levels; PFPA Ombudsman; WHS Labor Management and Employee Relations (LMER) representatives; Aspiring Leaders Program/Leading Police Organization's graduates; and representatives from the Office of General Counsel and Equal Employment Opportunity Program to assess and improve the inclusivity of the workforce. The DEIA WG engaged our Division Directors and ensured that our data and workforce analysts had access to all available data for review, trend classification, and identification of potential gaps. The assessment reflects the work of many and incorporates data from a variety of sources. Leveraging the diversity of our workforce and ensuring access and equity for all will promote creativity and innovation. DARPA has partnered with the National Center for Women and Information Technology (NCWIT) to study D&I recruitment and retention efforts.

#### **ELEMENT 2. INTEGRATION INTO AGENCY'S STRATEGIC MISSION:**

**EEO Director Involvement:** The WHS EEOP Director reports directly to the WHS Director, with whom she met with on a weekly basis in FY 2022. Additionally, she advised the WHS Director and senior leaders on strategies that promote an environment free of discrimination. The EEOP Director attended monthly WHS Leadership staff meetings and kept members apprised of EEO trends, progress, and concerns. In addition, the EEOP Director participated in various forums, such as the Human Resource Directorate (HRD) Customer Focus Forum, Senior Administrative Officers Forum, Defense Diversity Working Group, 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 and the AEP 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 each of the six essential elements and EEOP FY 2022 initiatives to gain Leadership buy-in and support.

**PFPA C.A.R.E.S:** In FY 2022, PFPA launched **PFPA C.A.R.E.S.** (creating a Culture of Alliances, Respect, and Equity, where all feel Safe). **PFPA C.A.R.E.S.** encouraged employee engagement and

facilitated opportunities for employees to ask questions and address their concerns. These opportunities took the form of the Federal Employee Viewpoint Survey (FEVS), the PFPA Climate Survey, component-level focus groups, senior staff meetings, and the Director's Feedback Line (an anonymous email platform sent to the Agency Director for response). Additionally, **PFPA C.A.R.E.S.** launched the Agency's first Employee Engagement Group, which focused on women's issues and offered learning and development assistance to help foster an inclusive workplace, and to strengthen all underrepresented communities by providing support and resources to address needs.

**Exit Survey Questions Revision:** WHS HRD established a working group to update the WHS employee exit interview. The purpose is to ensure the Agency receives feedback regarding recruitment, hiring, inclusion, and the advancement of individuals with disabilities (IwDs), as directed by EEOC. The information will be used to improve service in these areas. The survey will be administered via MilSuite and tentatively available to the workforce in the 3rd quarter of FY 2023. DARPA's Agency Director, Deputy Director, and Strategic Resources Director conducted exit interviews to assess overall employee experience and identify opportunities to improve Agency culture, recruitment, retention, and engagement.

**Recruitment:** DARPA continues to promote the use of workplace flexibilities and available benefits and resources (e.g., recruitment incentives, telework, health and wellness programs, leave credit for non-Federal service, student loan repayment, tuition assistance) to attract highly qualified employees in a competitive job market. DARPA held six regional events at research and development universities Nationwide to connect DARPA leaders with new communities of diverse talent and backgrounds. The National Center for Women and Information Technology (NCWIT) will be conducting a two-phase, 6-month study of our recruiting efforts to provide the Office of the Director (DIRO) and Technical Offices in DARPA customized recommendations for tapping into diverse pipelines for recruiting.

DARPA continues to employ, train, and promote veterans with disabilities as opportunities arise. Public announcements are open for veterans to apply. Strategic recruitment discussions incorporate available hiring authorities to provide the broadest opportunity for qualified candidates to apply for DARPA vacancies. DARPA uses the Schedule A Hiring Authority when applicable. Currently, 7% of the DARPA workforce are IwDs.

### **ELEMENT 3. MANAGEMENT AND PROGRAM ACCOUNTABILITY**

**Reasonable Accommodations (RA) and Personal Assistance Services (PAS):** WHS ensured all new employees with disabilities were aware of the RA Program and assistive technologies available to modify their workspace and/or effectively help with their acclimation to the workplace. All requests for RA were processed within the 30-day timeframe are required by Administrative Instruction 114 (AI 114).

**American Sign Language (ASL) Interpreting Program (ASLIP):** WHS ASLIP team offers both ASL interpreting and reader support services to employees with disabilities for workplace meetings, trainings, phone calls, workshops, and special events. In FY 2022, WHS provided RA services for 12 employees (9 deaf and hard-of-hearing employees and 3 blind and low-vision employees). WHS received 3,206 ASLIP service requests and 527 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 the use of interpreters in the workplace, co-taught by deaf WHS employees.

#### **ELEMENT 4. PROACTIVE PREVENTION**

**Anti-Harassment Program:** In FY 2022, the WHS HRD selected an Anti-Harassment Coordinator to develop the Agency’s AHP. The AHP operates independently from the EEO Complaint Process (29 C.F.R. § 1614). The purpose of the Agency’s AHP is to maintain a work environment free from harassment, assist Managers and Supervisors in conducting fact-finding allegations of harassment, and facilitate the resolution process. The AHP Procedures were revised, in accordance with EEOC’s requirements, to promptly and effectively address allegations of workplace harassment within the WHS workforce.

**WHS Facility Accessibility Task Force (FATF):** WHS Facilities Services Directorate (FSD) FATF advocates and provides a voice for Persons with Disabilities (PwDs) in buildings owned and operated by WHS. The WHS Accessibility Working Group includes WHS customers, facility management, and accessibility advocates dedicated to addressing and resolving the accessibility concerns brought forward by the WHS FATF. This group met quarterly to discuss facility accessibility issues and to resolve and address concerns such as:

- Installation of Plexiglas barriers throughout the Pentagon in response to COVID-19.
- Automatic door openers with Architectural Barriers Act requirements throughout the Mark Center.
- Proposal to add water fountains throughout Mark Center with both high and low fountain heights.
- Continue installation of automatic sliding doors along the first floor of A&E Drive at the Pentagon.

**Demographic Dashboards:** EEOP provides each WHS component with a demographic analysis of the component’s populations to inform workforce planning, including recruiting and succession planning (upon request). The demographic dashboard includes the following analysis: overall race, gender, national origin (RGNO); senior grades by RGNO and disability status; major occupations by RGNO and disability status; the onboard ratio of individuals with targeted and reportable disabilities; Veterans; generations; and retirement eligibility. In addition, WHS provides PFPA leadership with demographic dashboard reports and analysis of workforce populations. This information informed workforce planning, which includes recruiting and succession planning. The demographic dashboard consisted of the following analysis: overall race, gender, national origin (RGNO); senior grades by RGNO and disability status; major occupations by RGNO and disability status; the onboard ratio of individuals with targeted and reportable disabilities; Veterans; generations; and retirement eligibility.

**EEO Annual Training for Supervisors and Employees:** In FY 2022, WHS continued to provide EEO training for all supervisors and employees. The training included the Complaints process, Anti-Harassment process, ADR, and EEO laws and guidance. The following breakdown is as follows:

<b>Training</b>	<b>Attendees</b>
EEO and Anti-Harassment for Supervisors	414
EEO and Anti-Harassment for Non-Supervisors	2,054
Basics of Conflict Management for Supervisors	169
Diversity in the Workplace for Non-Supervisors	86
Diversity in the Workplace for Supervisors	19
No FEAR Act (online) Training	4,375
<b>Total</b>	<b>7,117</b>

DARPA conducted No FEAR Act Training for Managers and Employees to reaffirm DARPA's commitment to a productive environment free from discrimination, harassment, and reprisal. There was 100% (198) employee participation in No FEAR Act Training.

#### **ELEMENT 5. EFFICIENCY**

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

**Complaints (Status and Update):** During FY 2022, WHS filed 44 complaints. There were eight settlements and three withdrawals (no complaints filed). In FY 2022, there were eight settlements, compared to FY 2021, with four successful settlements. Most of the formal EEO complaints were based on claims of race, disability, reprisal, sex, and/or age discrimination. ADR was offered 25 times (reflecting approximately a 56% offer rate) and 20 individuals (80%) accepted ADR. The Agency continued to utilize the MicroPact iComplaints software to track and process complaints, in accordance with regulatory timelines. DARPA had no formal EEO complaints filed; one conflict issue was addressed and resolved through ADR.

**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 environment so that issues can be addressed early. In FY 2022, the ADR Program office conducted 26 mediations to address EEO complaints of alleged discrimination and six sessions to address non-EEO workplace issues. The Program also supported the DoD Shared Neutral Program by facilitating five mediations outside its serviced population. Additionally, the Program facilitated 17 climate surveys, 1 group facilitation, 23 focus groups for 1 organization, and 39 sensing sessions for 7 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 first quarter of FY 2022. The event, titled "The Changing Landscape of ADR and Conflict Management," was held virtually for two half-days and featured speakers from various DoD Components and other Federal Agencies and non-governmental organizations. The EEO Complaints Manager 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, Office of General Counsel (OGC). EEOP posted all required No FEAR Act information, provided required training, and timely filed the MD-715, EEOC Form 462 reports, and other reports required by EEOC and the OPM. WHS timely implements corrective actions, such as facility postings, trainings, and reviews disciplinary actions, as appropriate.

**Office of General Counsel:** EEOP continued to maintain a cooperative relationship with WHS OGC and consults on legal issues, matters of mutual interest, and sought advice and expertise when dealing with unique situations.

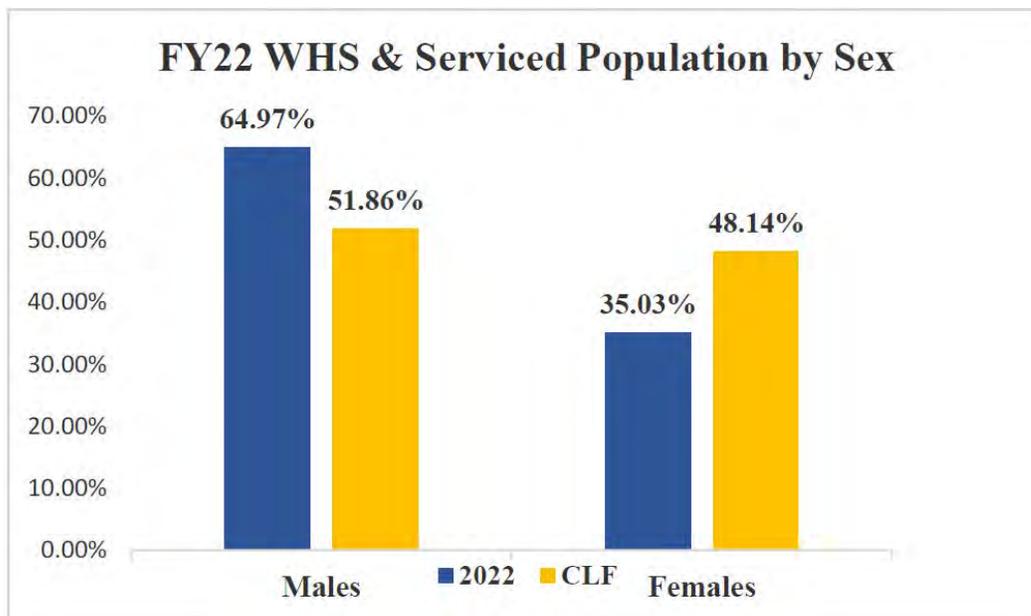
**EEO Investigations:** Investigations were completed by the DoD, Defense Human Resources Activity, Diversity Management Operations Center, and Investigations and Resolutions Directorate (IRD). EEOP does not control the timeframes for investigations but expects IRD to adhere to the 180 calendar-day timeframe allowed for such investigations. EEOP took proactive steps to ensure that IRD was timely notified of requests for investigations, 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

In FY 2022, workforce analysis provides information regarding the current composition of the WHS and Serviced Component workforce and trends impacting the workforce. Demographic data was extracted from the Business Objects Enterprise Reporting Service, and the U.S. Census Bureau 2010 National Civilian Labor Force (NCLF)<sup>1</sup> census data was used as a benchmark.

At the end of FY 2022, the total workforce (permanent and temporary) of WHS and Serviced Components increased from 5,271 to 5,312, representing a net increase of .78%. The overall workforce consists of 3449 (64.93%) males and 1,863 (35.07%) females, representing a net increase of -.35 and – 2.93, respectively. <sup>2</sup>The DARPA total workforce was 198; males 131 (66.16%) and females 67 (33.84%).



Additionally, Hispanics (males and females), White females and American Indian/Alaska Native males and females have low participation rates when compared to the appropriate benchmarks (*Table A-1*):

<sup>1</sup> The NCLF 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. NCLF data used in this Report is based on the 2010 Census.

<sup>2</sup> DARPA’s data was not included in the Agencies total workforce data.

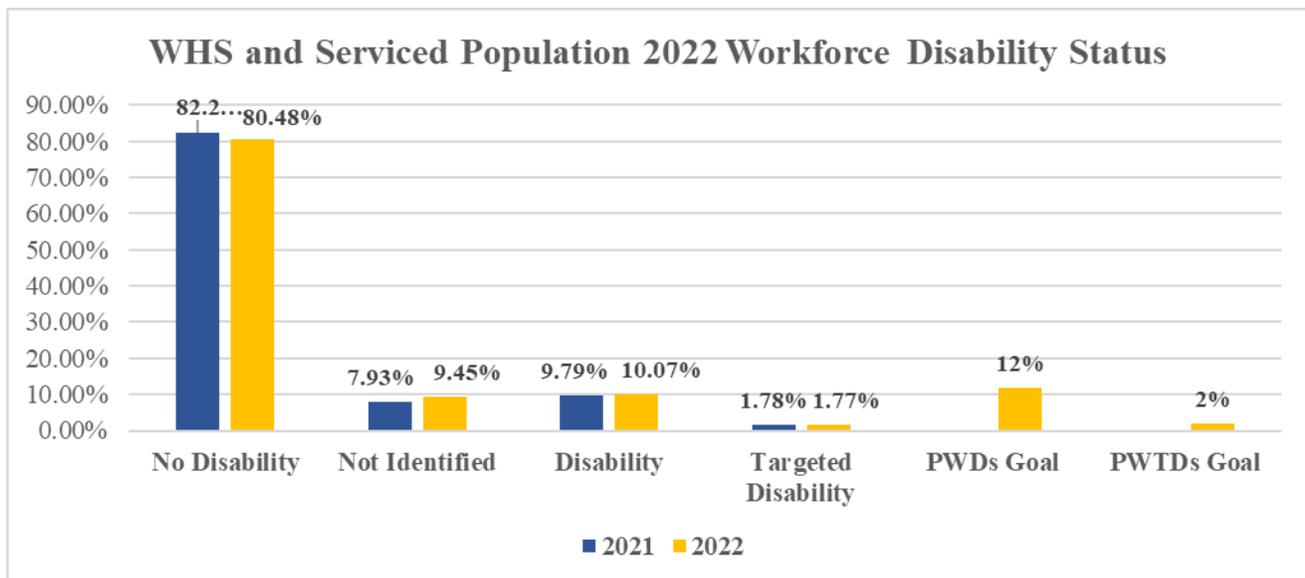
- White females – 19.71% versus CLF of 31.82%
- Hispanic males – 3.43% versus CLF of 6.82%
- Hispanic females – 1.68% versus CLF of 6.16%
- American Indian/Alaska Native males – 0.19% versus CLF of 0.31%
- American Indian/Alaska Native females – 0.09% versus CLF of 0.31%

Hispanic representation increased in FY 2022, but remains below the CLF; male representation was 3.43% below the CLF of 6.82%; while Hispanic female representation was 1.68% below the CLF for their respective CLF of 6.16%. Representation of White females increased in FY 2022 to 19.71% from 18.86% in FY 2021. In FY 2022, the data reflects a lower representation of American Indian/Alaska Native employees when compared to the CLF of 0.31%. The DARPA Hispanic workforce representation consisted of 4 males (2.02%) and 1 female (0.51%), which are below their respective CLF of 6.82% for males and 6.16% for females (*Table A-1*).

DoD adopted the Federal goal of 12% for hiring PwDs and 2% for hiring persons with targeted disabilities (PwTDs). In FY 2022, 10 temporary employees (1.42%) reported having a targeted disability; overall, PwDs represented 10.07% and PwTDs represented 1.77% of the workforce compared to PwDs at 9.79% and PwTDs at 1.78% in FY 2021 (*Table B1*).

When compared to the Federal goals for employment of people with disabilities:

- PwD<sup>3</sup> – 10.07% versus Federal goal of 12%
- PwTDs<sup>4</sup> – 1.77% versus Federal goal of 2%



<sup>3</sup>A reportable disability is a physical or mental impairment that substantially limits one or more major life activities (*e.g.* caring for one’s self, performing manual tasks, walking, seeing, hearing, speaking, breathing or learning) or a record of such impairment.

<sup>4</sup>PwTDs are a subset of those who have a reportable disability. The criteria EEOC used to select “targeted disabilities” included 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.

The Agency breakdown by Components is as follows:

WHS Serviced Components	Males	Females	Total Workforce
*AFRH	--	--	--
DARPA	131	67	198
DLSA	74	62	136
DPAA	175	108	283
DTRMC	17	3	20
DTSA	82	40	122
OLDCC	17	18	35
*OCJCS and JS	--	--	--
OSD	989	661	1650
PFPA	918	168	1086
WHS	753	500	1253 <sup>5</sup>
USCAAF	12	12	24

\*Data for OCJCS and AFRH will be reflected in FY 2023 MD-715 report.

Also, the following WHS Serviced Component did not meet, met, or exceeded the goals of 12% for IwDs and 2% for IwTDs:

WHS Serviced Components	2% Goal	12% Goal
OSD	1.82%	9.39%
DTRMC	5.00%	5.00%
DLSA	0.74%	9.56%
OLDCC	0.00%	2.86%
PFPA	0.74%	6.72%
USCAAF	0.00%	0.00%
DPAA	0.68%	14.84%
DTSA	0.82%	6.56%
DARPA	0.51%	4.55%
WHS	3.27%	14.53%

WHS has exceeded the goals of 12% for IwDs and 2% for IwTDs in from FY 2019 to FY 2022:

Fiscal Year (FY)	IwDs (12%)	IwTDs (2%)
FY 2019	14.04%	2.51%
FY 2020	13.83%	2.95%
FY 2021	14.19%	3.30%
FY 2022	14.53%	3.27%

<sup>5</sup> In FY 2024, reporting data demographics for the OCJCS and the JS, and AFRH will be included.

**Mission Critical Occupations:** WHS has 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 2022, there were 4,609 permanent employees. Of these permanent employees, there were 179 Security Specialists, 699 Police Officers, 209 Foreign Affairs Specialists, 694 Miscellaneous Administration and Programs Specialists, 577 Management and Program Analysts, 179 Contracting Specialists, and 78 Information Technology Specialists.

The participation rate for males in the Management and Program Analyst, and Contracting series was below the occupational CLF rate, while female representation was below the CLF for the Security Administration, Police, Foreign Affairs, Security Administration, Miscellaneous Administration, and Information Technology Management occupations. Hispanics males were underrepresented in major occupations 0083, 1102, and 2210, while representation of Hispanic, Black, and Asian females was below the CLF in occupations series 0080, 0083, 0130, and 2210. White males were underrepresented in occupational series 0080, 0343, 1102, and 2210 (*Table A6*).

**Applicant Flow Data - Internal Competitive Promotions**

**0080 - Security Administration** - In FY 2022, WHS received 413 applications for competitive promotions. Of the 413 individuals, 152 qualified for the promotion – 96 males and 22 females. Of those selected for the promotion, three were males and one was female.

**A further demographic breakdown of candidates who applied for internal promotions is as follows:**

EEO Group	Applications Received	Qualified for Competitive Promotion	Promoted
Hispanic	46	19	1 male
White	126	40	2 males
Black	130	47	1 female
Asian	10	4	0
Native Hawaiian/Other Pacific Islander	2	0	0
American Indian/Alaska Native	0	0	0
People with Disabilities	25	6	0
People with Targeted Disabilities	15	4	0

**0301 - Miscellaneous Administration and Program** - In FY 2022, WHS received 827 applications for competitive promotions. Of the 827 individuals, 293 qualified for the promotion – 133 males and 87 females. Of those selected for the promotion, two were males and four were females.

**A further demographic breakdown of candidates who applied for internal promotions are as follows:**

EEO Group	Applications Received	Qualified for Competitive Promotion	Promoted
Hispanic	76	25	0
White	260	101	1 female
Black	228	70	5 (3 females and 2 males)
Asian	42	9	0
Native Hawaiian/Other Pacific Islander	3	1	0
American Indian/Alaska Native	3	1	0
Two or More Races	8	4	0
People with Disabilities	55	20	0
People with Targeted Disabilities	41	16	0

**0343 - Management and Program Analysis** - In FY 2022, WHS received 913 applications for competitive promotions. Of the 913 individuals, 213 qualified for the promotion – 94 males and 61 females. Of those selected for the promotion, seven were males and seven were females.

**A further demographic breakdown of candidates who applied for internal promotions are as follows:**

EEO Group	Applications Received	Qualified for Competitive Promotion	Promoted
Hispanic	77	15	2 (1 male and 1 female)
White	241	58	6 (2 males and 4 females)
Black	309	68	5 (3 males and 2 females)
Asian	56	6	1 female
Native Hawaiian/Other Pacific Islander	3	0	0
American Indian/Alaska Native	12	1	0
Two or More Races	19	5	0
People with Disabilities	61	16	1 PwD
People with Targeted Disabilities	52	0	0

**1102 – Contracting** - In FY 2022, WHS received 138 applications for competitive promotions. Of the 138 individuals, 46 qualified for the promotion – 17 males and 17 females. Of those selected for the promotion, zero were males and three were females.

**A further demographic breakdown of candidates who applied for internal promotions are as follows:**

EEO Group	Applications Received	Qualified for Competitive Promotion	Promoted
Hispanic	16	5	0
White	45	13	2 females
Black	32	11	1 female
Asian	9	2	0
Native Hawaiian/Other Pacific Islander	1	0	0
American Indian/Alaska Native	1	1	0
Two or More Races	0	0	0
People with Disabilities	9	2	0
People with Targeted Disabilities	5	3	0

**New Hires** - WHS and Serviced Components hired 315 permanent and 217 temporary employees in FY 2022. Overall, females were hired for permanent positions (34.60%) at a lower rate than males (65.40%). White males (40.00%) hired were almost three times the rate of Black/African Americans males (12.70%); Asian males were hired at 5.71%. White and Asian females were hired at rates slightly lower than the CLF. A total of 9 Hispanic females were hired at a rate of 2.86%. There were 31 permanent and 13 temporary PwDs and 5 permanent and 2 temporary PwTDs hired in FY 2022. In FY 2022, DARPA hired 52 employees, 17 permanent and 35 temporaries. Total males 35 (67.31%) and females 17 (32.69%). There were no IwDs or IwTDs. (See Table A8 and B8).

**Employee Recognition and Awards** - A review of Table A13 reflects that males and females received time-off awards (1-9 hours). Males received 75.36% of the awards and females 24.64%. Hispanic males (1.45%) and females (0.00%), White males (42.03%) and White females (7.25%), and Black males (20.29%) and Black females (11.59%) are below the workforce participation rates for time-off awards. No time-off awards were given to either Native Hawaiian or Other Pacific Islander males or females.

On average, in the category of cash awards \$500 and under, males received higher cash awards than females (\$283 versus \$150). Table B13 depicts the average cash award for PwDs was commensurate with all employees (\$433); however, the average cash award for PwTDs was \$395. For cash awards of \$2,000 - \$2,999, males received 65.72%, with an average of \$2,392, while females received a slightly higher average of \$2,416. Cash awards of \$2,000 - \$2,999 for PwDs averaged \$2,359 and \$2,350 for PwTDs.

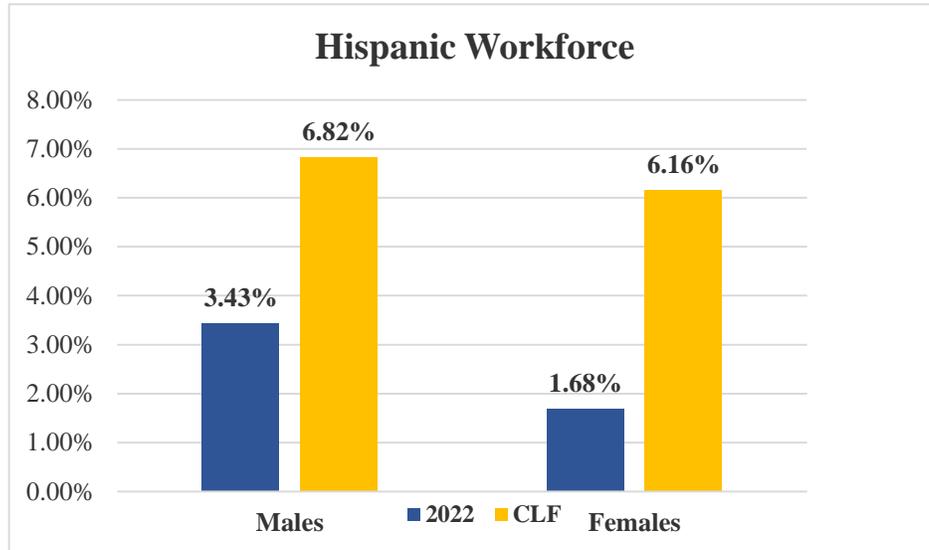
Three hundred and twelve Quality Step Increases (QSIs) were given in FY 2022 based on the FY 2021 performance cycle. Of those, 61% were males, and 38% were females. No or minimal QSI awards were given to American Indian or Alaska Native and Native Hawaiian or Other Pacific Islander employees. There were 35 (11.22%) PwDs and 5 (1.60%) PwTDs who received awards in this category (See Tables A13 and B13).

**Employee Separations** – In FY 2022, 609 employees separated from the Agency. Males separated at 64.70% (394) and females separated at 35.30% (215) while representing 35.07% of the female workforce. Of the 609 separations, 8 were removals, 168 were resignations, 201 were retirements, and the remaining 232 were other separations. Of the eight removals, six were males and two were females. In FY 2022, 55 PwDs and 12 PwTDs separated from the Agency. A total of 34 employees separated from the DARPA

workforce. Males separated at 76.47% (26) and females separated at 23.53% (8). Of the 34 separations, 13 resigned, 5 retired and 11 were other separations. There were no separations of IwDs or IwTDs (*Tables A14 and B14*).

**Agency’s Hispanic Workforce Analysis Summary** - The following triggers were identified:

- Hispanic males – 3.43% versus CLF of 6.82%
- Hispanic females – 1.68% versus CLF of 6.16%



Representation of Hispanic males has steadily increased while female representation slightly decreased during this period but remains below the CLF; for their respective demographics, males are -3.39% below the CLF and females are -4.48% below the CLF.

## **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 Special Emphasis Programs?

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

### **Element C: Management and Accountability**

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?

<b>EEOC FORM 715-01 PART F</b>	<b>U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>	
<b>CERTIFICATION of ESTABLISHMENT of CONTINUING EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS</b>		
I, Pamela R. Sullivan, am the Director, Office of Equal, Employment Opportunity Programs (EEOP)		
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.RENEE .1047227050	Digitally signed by SULLIVAN.PAMELA.RENEE.1047227050 Date: 2023.03.17 13:32:18 -0400/	Date
Pamela R. Sullivan Director, EEO (Signature of Principal EEO Director/Official Certifies that this Federal Agency Annual EEO is in Compliance with EEO MD-715.)	Digitally signed by MEINERS.REGINA.FACC HINA.1232122524 Date: 2023.03.20 13:58:55 -0400/	
Regina F. Meiners Director, WHS (Signature of Agency Head or Agency Head Designee)	Date	

EEOC FORM 715-01 PART E	<b>U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>
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WASHINGTON HEADQUARTERS SERVICES DOD	For period covering October 1, 2021 to September 30, 2022
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**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

Compliance Indicator	A.1 – The agency issues an effective, up-to-date EEO policy statement.	Measure Met? (Yes/No/NA)	Comments
Measures			
<b>A.1.a</b>	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)]	Y	October 12, 2022
<b>A.1.b</b>	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]	Y	OCJCS and JS - As part of the OCJCS EEO Programs’ recent transition under WHS, OCJCS, and JS Policy Statements will align and distributed with WHS Policy Statements.
Compliance Indicator	A.2 – The agency has communicated EEO policies and procedures to all employees.	Measure Met? (Yes/No/NA)	Comments
Measures			
<b>A.2.a</b>	Does the agency disseminate the following policies and procedures to all employees:		
<b>A.2.a.1</b>	Anti-harassment policy? [see MD 715, II(A)]	Y	
<b>A.2.a.2</b>	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	Y	
<b>A.2.b</b>	Does the agency prominently post the following information throughout the workplace and on its public website:	Y	
<b>A.2.b.1</b>	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)]	Y	
<b>A.2.b.2</b>	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)]	Y	

<b>A.2.b.3</b>	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column. <a href="https://whs.sp.pentagon.mil/HRD/DDR/SitePages/Disability.aspx">https://whs.sp.pentagon.mil/HRD/DDR/SitePages/Disability.aspx</a>	Y	
<b>A.2.c</b>	Does the agency inform its employees about the following topics:		
<b>A.2.c.1</b>	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often.	Y	During EEO Monthly Training
<b>A.2.c.2</b>	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Y	During EEO Monthly Training
<b>A.2.c.3</b>	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Y	During EEO Monthly Training
<b>A.2.c.4</b>	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.	Y	
<b>A.2.c.5</b>	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If “yes”, please provide how often.	Y	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>A.3 – The agency assesses and ensures EEO principles are part of its culture.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>A.3.a</b>	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.	Y	Both WHS and OCJCS are active participants supporting the Office Under Secretary of Defense for Personnel and Readiness Recognition and Awards Program for employees, supervisors, and managers.
<b>A.3.b</b>	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Y	
<b>Essential Element B: INTEGRATION OF EEO INTO THE AGENCY’S STRATEGIC MISSION</b>			
<b>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.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>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.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.1.a</b>	Is the agency head the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]	Y	
<b>B.1.a.1</b>	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	N/A	

	the title of the agency head designee in the comments.		
<b>B.1.a.2</b>	Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Y	
<b>B.1.b</b>	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	Y	
<b>B.1.c</b>	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.	Y	
<b>B.1.d</b>	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]	Y	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.2 – The EEO Director controls all aspects of the EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.2.a</b>	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]	Y	
<b>B.2.b</b>	Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)]	Y	
<b>B.2.c</b>	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Y	
<b>B.2.d</b>	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Y	
<b>B.2.e</b>	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Y	
<b>B.2.f</b>	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]	Y	
<b>B.2.g</b>	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2) and (c)(3)]	Y	

 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.</b>	<b>Measure Met?</b> <b>(Yes/No/NA)</b>	<b>Comments</b>
<b>B.3.a</b>	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)]	Y	
<b>B.3.b</b>	Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.	Y	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.</b>	<b>Measure Met?</b> <b>(Yes/No/NA)</b>	<b>Comments</b>
<b>B.4.a</b>	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:		
<b>B.4.a.1</b>	to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	Y	
<b>B.4.a.2</b>	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	Y	
<b>B.4.a.3</b>	to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	Y	
<b>B.4.a.4</b>	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.	Y	
<b>B.4.a.5</b>	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]	Y	
<b>B.4.a.6</b>	to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	Y	
<b>B.4.a.7</b>	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.	Y	OJCS - Applicant Flow Data will be collected and analyzed along with WHS' Applicant Flow Data. WHS will continue to utilize the DoD

			Advana Analytics Data platform to gain access to evaluate all WHS/OJCS' internal and external Applicant Flow Data concerning applicants' race, national origin, sex, and disability status.
<b>B.4.a.8</b>	to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]	Y	
<b>B.4.a.9</b>	to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Y	
<b>B.4.a.10</b>	to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]	Y	
<b>B.4.a.11</b>	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Y	
<b>B.4.b</b>	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	Y	
<b>B.4.c</b>	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Y	
<b>B.4.d</b>	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?	Y	
<b>B.4.e</b>	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?	Y	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.5.a</b>	Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:		
<b>B.5.a.1</b>	EEO Complaint Process? [see MD-715(II)(B)]	Y	
<b>B.5.a.2</b>	Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]	Y	
<b>B.5.a.3</b>	Anti-Harassment Policy? [see MD-715(II)(B)]	Y	
<b>B.5.a.4</b>	Supervisory, managerial, communication and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	Y	

<b>B.5.a.5</b>	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)]	Y	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.6 – The agency involves managers in the implementation of its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.6.a</b>	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	N	<b>PART H-1</b> WHS will ensure the OJCS workforce is invited to and aware of all Special Emphasis Programs (SEP) events sponsored by the Defense Management Operations Center (DMOC) and the Pentagon.
<b>B.6.b</b>	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	N	<b>PART H-1</b> WHS will ensure OJCS’s Senior Managers are involved in the WHS barrier analysis process. OJCS’s will be invited to become Champions when conducting barrier analysis
<b>B.6.c</b>	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]	Y	
<b>B.6.d</b>	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR § 1614.102(a)(5)]	Y	
<b>Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY</b>			
<b>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.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.1 – The agency conducts regular internal audits of its component and field offices.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.1.a</b>	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If “yes”, please provide the schedule for conducting audits in the comments section.	N/A	
<b>C.1.b</b>	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If “yes”, please provide the schedule for	N/A	

	conducting audits in the comments section.		
<b>C.1.c</b>	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	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.2 – The agency has established procedures to prevent all forms of EEO discrimination.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.2.a</b>	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)]	Y	
<b>C.2.a.1</b>	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]	N	<b>Part H-2</b>
<b>C.2.a.2</b>	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)]	Y	
<b>C.2.a.3</b>	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)]	Y	
<b>C.2.a.4</b>	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [see Enforcement Guidance, V.C.]	Y	
<b>C.2.a.5</b>	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 comments column.	Y	
<b>C.2.a.6</b>	Do the agency’s training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR 1614.203(d)(2)]	Y	
<b>C.2.b</b>	Has the agency established disability reasonable accommodation procedures that comply with EEOC’s regulations and guidance? [see 29 CFR 1614.203(d)(3)]	Y	
<b>C.2.b.1</b>	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR	Y	

	1614.203(d)(3)(D)]		
<b>C.2.b.2</b>	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	Y	
<b>C.2.b.3</b>	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]	Y	
<b>C.2.b.4</b>	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]	Y	
<b>C.2.b.5</b>	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.	Y	
<b>C.2.c</b>	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC’s regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	Y	
<b>C.2.c.1</b>	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comments column.	Y	The RA Form (AI114) is currently in coordination to include PAS policy. The issuance will be posted to the public website upon completion.
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.3 – The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.3.a</b>	Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	Y	
<b>C.3.b</b>	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:		
<b>C.3.b.1</b>	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]	Y	
<b>C.3.b.2</b>	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	Y	
<b>C.3.b.3</b>	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	Y	
<b>C.3.b.4</b>	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	Y	

<b>C.3.b.5</b>	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	Y	
<b>C.3.b.6</b>	Provide disability accommodations when such accommodations do not cause an undue hardship? [ see 29 CFR §1614.102(a)(8)]	Y	
<b>C.3.b.7</b>	Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]	Y	
<b>C.3.b.8</b>	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]	Y	
<b>C.3.b.9</b>	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)]	Y	
<b>C.3.c</b>	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	Y	
<b>C.3.d</b>	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	Y	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.4.a</b>	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	Y	
<b>C.4.b</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]	Y	<b>PART H-3 Closed</b>
<b>C.4.c</b>	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 CFR §1614.601(a)]	Y	
<b>C.4.d</b>	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)]	Y	
<b>C.4.e</b>	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:		
<b>C.4.e.1</b>	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	Y	
<b>C.4.e.2</b>	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	Y	

C.4.e.3	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Y	
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	Y	
C.4.e.5	Assist in preparing the MD-715 report? [see MD-715, II(C)]	Y	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
C.5.a	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)]	Y	
C.5.b	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Y	
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)]	Y	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.6 – The EEO office advises managers/supervisors on EEO matters.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
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.	Y	
C.6.b	Are EEO officials readily available to answer managers’ and supervisors’ questions or concerns? [see MD-715 Instructions, Sec. I]	Y	
<b>Essential Element D: PROACTIVE PREVENTION</b>			
<b>This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
D.1.a	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	Y	
D.1.b	Does the agency regularly use the following sources of	Y	Focus Groups will be

	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]		reestablished to correct this deficiency in FY 2022.
<b>D.1.c</b>	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]	Y	WHS HRD recently established an Exit Survey Working Group. EEOP is participating as a member of the working group to ensure exit survey questions regarding recruitment, hiring, inclusion, retention, and advancement of PWDs are addressed in compliance with EEOC guidance.
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.2.a</b>	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	Y	
<b>D.2.b</b>	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	Y	
<b>D.2.c</b>	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	Y	
<b>D.2.d</b>	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.	Y	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.3 – The agency establishes appropriate action plans to remove identified barriers.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.3.a.</b>	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices?	Y	

	[see 29 CFR §1614.102(a)(3)]		
<b>D.3.b</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)]	Y	
<b>D.3.c</b>	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	Y	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.4.a</b>	Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d)(4)]; Please provide the internet address in the comments.	Y	
<b>D.4.b</b>	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]	Y	
<b>D.4.c</b>	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]	Y	
<b>D.4.d</b>	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)]	Y	Conducted special recruiting efforts: WRP, Wounded Warrior Program.
<b>Essential Element E: EFFICIENCY</b>			
<b>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.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.1.a</b>	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Y	
<b>E.1.b</b>	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Y	
<b>E.1.c</b>	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?	Y	
<b>E.1.d</b>	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.	Y	
<b>E.1.e</b>	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	Y	
<b>E.1.f</b>	Does the agency timely complete investigations, pursuant to 29	Y	<b>Part H-4</b>

	CFR §1614.108?		<b>Closed</b>
<b>E.1.g</b>	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	Y	
<b>E.1.h</b>	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	Y	
<b>E.1.i</b>	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge’s decision, pursuant to 29 CFR §1614.110(a)?	Y	
<b>E.1.j</b>	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	
<b>E.1.k</b>	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)]	Y	
<b>E.1.l</b>	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Y	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.2 – The agency has a neutral EEO process.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.2.a</b>	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)]	Y	
<b>E.2.b</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.	Y	Ms. Jenifer Schall, Chief of Labor and Employment Law.
<b>E.2.c</b>	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)]	Y	
<b>E.2.d</b>	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)]	Y	
<b>E.2.e</b>	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)]	Y	

 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.3 – The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
E.3.a	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	Y	
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)]	Y	
E.3.c	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	Y	
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)]	Y	
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)]	Y	
E.3.f	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Y	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
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)]	Y	
E.4.a.2	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	Y	
E.4.a.3	Recruitment activities? [see MD-715, II(E)]	Y	
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)]	Y	
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]	Y	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
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	Y	

	example in the comments.		
<b>E.5.b</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.	Y	Department of Veterans Affairs, method of annotating acceptance of HWE incidents and then specifying accepted discrete.
<b>E.5.c</b>	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Y	
<b>Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE</b>			
<b>This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>F.1.a</b>	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	Y	
<b>F.1.b</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)]	Y	
<b>F.1.c</b>	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Y	
<b>F.1.d</b>	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Y	
<b>F.1.e</b>	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)]	Y	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>F.2.a</b>	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	Y	
<b>F.2.a.1</b>	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]	Y	
<b>F.2.a.2</b>	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	Y	
<b>F.2.a.3</b>	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR §1614.403(e)]	Y	
<b>F.2.a.4</b>	Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing	Y	

	compliance?		
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.3 – The agency reports to EEOC its program efforts and accomplishments.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>F.3.a</b>	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	Y	
<b>F.3.b</b>	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	Y	

## 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
<b>B.6.a</b>	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]
<b>B.6.b</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		
11/01/2021	Establish Champions for Special Emphasis Programs to actively engage in the barrier analysis process.	06/30/2023		

#### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Director, Office of Equal Employment Opportunity Programs	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		06/30/2022
01/15/2023	Invite Senior leaders to participate in Special Emphasis Programs.	YES		
03/15/2023	Conduct introductory workshops with key barrier	YES		

Target Date	Planned Activities	Sufficient Funding and Staffing? (Yes or No)	Modified Date	Completion Date
	analysis partners.			

**Report of Accomplishments**

FY	Accomplishments
<b>FY 2022</b>	<p>WHS ensured its workforce and servicing components were aware of all Special Emphasis Programs, including program updates, observances, events, etc. In FY 2023, EEOP plans to inform Senior Leaders of all observances and special events at Senior Level meetings and discussions.</p> <p>EEOP held collaborative meetings with HRD to discuss HR/EEO-related activities to explore initiatives to attract, hire and promote a diverse workforce, including Veterans and disability-employment-focused events. In addition, HRD/EEOP discussed outreach opportunities and hiring strategies and identified and mitigated barriers to promote successful employment programs.</p> <p>EEOP continues to analyze the workforce data, which identifies various triggers within WHS’s permanent and disability workforce, including triggers for new hires, separations, mission-critical occupations, and awards.</p>

## MD-715 – Part H - 2

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

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

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

#### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
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]

#### Objective(s) and Dates for EEO Plan

Date Initiated	Objective	Target Date	Modified Date	Date Completed
10/01/2021	Create an effective Anti-Harassment (AH) Program in compliance with EEOC guidance and communicate the Anti-Harassment Policy to prevent and eliminate all types of harassment.	12/30/2023		

#### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Chief Human Resources Officer/HRD	Christine N. Nalli	NO
Director, Office of Equal Employment Opportunity Programs	Pamela R. Sullivan	NO

#### Planned Activities toward Completion of Objective

Target Date	Planned Activities	Sufficient Funding and Staffing? (Yes or No)	Modified Date	Completion Date
10/01/2021	Develop a standard operating procedure to explain the Anti-Harassment process to supervisors and employees.	YES		10/2022
12/02/2021	Ensure all inquiries for allegation of harassment are addressed within 10 days of notification and track harassment inquiries and investigations.	YES		10/2022
03/01/2022	Establish an effective Anti-Harassment process/procedures and ensure there is a protection against	YES		10/2022

Target Date	Planned Activities	Sufficient Funding and Staffing? (Yes or No)	Modified Date	Completion Date
	retaliation.			

**Report of Accomplishments**

FY	Accomplishments
FY 2022	<p>The AHP, located in HRD, was recently established to maintain a harassment-free work environment and to provide awareness to the Agency workforce. During FY 2022, an Anti-Harassment (AH) Coordinator was selected and began revising EEOC-approved AHP instruction. Standard operating procedures were developed, highlighting the roles and responsibilities of various stakeholders throughout the harassment inquiry process. Office of General Counsel (OGC) performed a legal sufficiency review of the AH instruction and highlighted concerns that must be addressed prior to the finalization of the instruction.</p> <p>The Anti-harassment program was introduced to WHS customers through the Customer Focused Forums (CFF). Specifically, information has been shared regarding the different avenues of redress of the Anti-Harassment process and the EEO Complaints process, noting that an anti-harassment claims process does not initiate an EEO Complaints process. An overview of the intake process was provided, and examples of harassment and bullying were shared.</p> <p>In addition, the AH Coordinator explained that the anti-harassment program would conduct an inquiry in response to a claim alleging harassment and emphasized that initiating the anti-harassment process does not toll the time limits for initiating an EEO complaint, administrative grievance, or negotiated grievance. EEO continued to provide Anti-Harassment Training in our mandatory bi-annual EEO and Diversity training.</p>

## MD-715 – Part H – 3 **CLOSED**

### 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
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]

### Objective(s) and Dates for EEO Plan

Date Initiated	Objective	Target Date	Modified Date	Date Completed
01/15/2021	Establish timetables to review at regular intervals policies, practices, and procedures, including the merit promotion program, employee recognition awards program, and development/training programs for systemic barriers that may be impeding full participation in the program by all EEO groups.	09/15/2022		09/30/2022

### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Director, Office of Equal Employment Opportunity Programs	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
11/01/2021	Working with HRD, determine all WHS policies	YES		03/20/22

<b>Target Date</b>	<b>Planned Activities</b>	<b>Sufficient Funding and Staffing? (Yes or No)</b>	<b>Modified Date</b>	<b>Completion Date</b>
	and procedures that are related to merit promotion, employee recognition, employee development/training programs.			
01/30/2022	Work with HRD to develop a reasonable timeline to review these policies related to merit promotion, recognition, development and training programs for barriers to various populations.	YES		05/15/22
03/30/2022	Work with HRD to understand the number of management/personnel policies, procedures, and practices that currently exist.	YES		07/15/22
06/30/2022	Work with HRD, formulate a timeline with milestones and schedule for a review of all WHS management/personnel policies.	YES		09/30/22

### **Report of Accomplishments**

<b>FY</b>	<b>Accomplishments</b>
<b>FY 2022</b>	<p>In FY 2022, EEOP reviewed DoD and WHS issuances for management and personnel policies, procedures, and practices (merit promotion, employee recognition awards, and the employee development/training program) through the WHS Administrative Issuance portal. EEOP reviewed the following policies and procedures for systemic barriers:</p> <ul style="list-style-type: none"> <li>• Incentive and Honorary Awards Program</li> <li>• Employee Grievances</li> <li>• Merit Promotion Plan</li> <li>• Labor Management Relations Program</li> <li>• Employee Learning and Development</li> </ul> <p>The review of these policies and procedures identified no systemic barriers. EEOP will continue to monitor these policies and procedures as revisions and updates are made.</p>

**MD-715 – Part H – 4 - CLOSED**

**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
E.1.f	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?

**Objective(s) and Dates for EEO Plan**

Date Initiated	Objective	Target Date)	Modified Date	Date Completed
10/01/2021	WHS seeks to improve the timeliness of investigations.	10/01/2023		10/1/2022

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
Director, Office of Equal Employment Opportunity Programs	Pamela R. Sullivan	YES
Complaint Manager	Patrick Anderson	NO

**Planned Activities Toward Completion of Objective**

Target Date	Planned Activities	Sufficient Funding and Staffing? (Yes or No)	Modified Date	Completion Date
11/15/2021	EEOP will work with Investigation Resolution Division (IRD) leadership to ensure investigations are timely completed.	YES	12/1/2021	10/1/2022
12/15/2022	Regularly monitor investigation processing time and evaluate processes for efficiencies.	YES	12/1/2021	10/1/2022

**Report of Accomplishments**

FY	Accomplishments
FY 2022	EEOP continued to make progress in the timely completion of investigation. The average number of days has decreased over the last 2 FYs (in FY 2022, the average was 129.88 days, down from 144. 28 days in FY 2021). This goal was reached through effective communications with the IRD and the Agency ensuring all requested documents were

	submitted in a timely manner. There is no need to continue monitoring this effort.
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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 gender.

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, A8, and A16	<p><b>Total Workforce:</b> WHS permanent workforce data (Table A1) reflects a low participation rate for females (35.07%) compared to the CLF of (48.21%). Specifically, Hispanic females (1.68%), White females (19.71%), and Asian females (2.07%) are below their respective CLFs.</p> <p><b>New Hires:</b> The Agency hired 532 new employees, of whom 191 (35.90%) were females, which falls below the CLF of 48.21%.</p> <p><b>Separation:</b> Six hundred and nine employees separated the Agency in FY 2022. Two Hundred and fifteen (35.30%) females separated which was slightly above the total workforce of 35.07% and below the CLF of 48.16% of the overall WHS workforce.</p>
Female Workforce GS-14 thru SES	Table A4	<p>In comparison to the permanent workforce, female participation rate was 35.07%. The following are areas of concern:</p> <p>The GS-15 female participation rate was 340 (35.53%). In FY 2022, the total participation rate for Hispanic females was 1.81% compared to the permanent workforce of 1.63%, Black females were 12.31% compared to the permanent workforce of 10.46%.</p> <p>The Senior Executive Service (SES) Hispanic female population was 2 (0.78%), compared to the permanent workforce rate of 1.63%. The SES Black female population was 8 (3.11%), compared to the permanent workforce of 10.46%.</p>

#### 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

<b>EEO Group</b>
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 2022 44 complaints were filed, 17 females filed 20 complaints of which 11 claimed sex, 6 disability, 6 race, 2 age, 2 color, and 10 reprisals.
Grievance Data (Trends)	YES	In FY 2022, there were 23 grievances, 8 were females, of which 4 were White and 4 were Black.
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	NO	
Climate Assessment Survey (e.g., FEVS)	NO	
Exit Interview Data	NO	The exit survey questions were revised in FY 2022; data will be captured in FY 2023.
Focus Groups	YES	WHS conducted five female-only sessions, one session with DPAA, and four sessions with PFPA.
Interviews	NO	
Reports (e.g., Congress, EEOC, MSPB, Government Accountability Office (GAO), OPM)	NO	
Other (Please Describe)	NO	

**Status of Barrier Analysis Process**

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

**Statement of Identified Barrier(s)**

**Description of Policy, Procedure, or Practice**

WHS needs to determine why females have a low participation rate in WHS's total workforce and why females separated the Agency at 35.30%

**Objective(s) and Dates for EEO Plan**

<b>Objective</b>	<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding and Staffing? (Yes or No)</b>	<b>Modified Date</b>	<b>Date Completed</b>
Collaborate with HRD's Recruitment Team on events and efforts for females.	10/01/2021	10/01/2023			
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	10/01/2023			
Examine the Applicant Flow Data to determine whether women are applying and/or being selected.	10/01/2021	10/12/2023			

**Responsible Official(s)**

<b>Title</b>	<b>Name</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>
Director, Equal Employment Opportunity Programs	Pamela R. Sullivan	NO
Chief Human Resources Officer/HRD	Christine N. Nalli	NO

**Planned Activities Toward Completion of Objective**

<b>Target Date</b>	<b>Planned Activities</b>	<b>Modified Date</b>	<b>Completion Date</b>
02/15/2023	Collaborate with HRD's Recruitment Team on events and efforts for females.		
03/13/2023	Develop a Recruitment and Outreach Plan identifying undergraduate, graduate schools and universities, summer internships and associations for women.		

<b>Target Date</b>	<b>Planned Activities</b>	<b>Modified Date</b>	<b>Completion Date</b>
05/15/2023	Participate in HRD's Recruitment discussion and provide input.		
08/30/2023	Examine exit survey data to determine why females are leaving the Agency.		
09/01/2023	Develop partnerships with colleges, universities that have a high percentage of women with mission critical skillsets.		
11/02/2023	Examine the Applicant Flow Data to determine whether women are applying and/or being selected.		

**Report of Accomplishments**

<b>FY</b>	<b>Accomplishments</b>
<b>FY 2022</b>	<p>HRD established a workgroup and invited EEOP to collaborate on updating the WHS employee exit interview. The purpose is to ensure feedback is received regarding recruitment, hiring, inclusion, and the advancement of IwDs as directed by EEOC. The information will be used to improve service in these areas. The survey will be administered via MilSuite and is tentatively scheduled to be sent the 3rd quarter of FY 2023. 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 and outreach opportunities and hiring strategies for females in the workplace.</p> <p>EEOP continues to analyze the workforce data, which identifies various triggers for females 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 for women. These schools and institutions will be included in HRD's recruitment and outreach efforts for FY 2023.</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 gender.

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 participation rate in FY 2022 for males was 182 (3.43%), which was below the CLF of 6.82%; for Hispanic females, the rate was 89 (1.68%), which was below the CLF of 6.16%.</p> <p><b>New Hires:</b> The Agency hired 532 employees, of whom 18 (3.38%) were Hispanic males below the CLF of 6.82% and 11 (2.07%) were Hispanic females below the CLF of 6.16%.</p> <p><b>Separation:</b> Thirty-two Hispanics separated from WHS in FY 2022. Separation of Hispanic males was at 19 (3.12%) which was below the CLF of 6.82%. Of the 215 females who separated the Agency, 13 (2.13%) 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	The participation rate Hispanic males in the SES was nine (3.50%), and Hispanic females two (0.78%). The analysis reveals 88 (7.00%) of the 125 Hispanic employees were at the GS-13 – GS-15 pay grades, placing them in the SES pipeline.
Major Occupation	Table A6	Hispanic males are well below the CLF of all major occupations except for 0083 (Police Officers). Hispanic females are below major occupations except for 0343 (Management and Program Analysis).

**EEO Group(s) Affected by Trigger**

EEO Group
Hispanic or Latino Males
Hispanic or Latino Females

**Barrier Analysis Process**

<b>Sources of Data</b>	<b>Source Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Workforce Data Tables	YES	Examined the FY 2022 workforce data.
Complaint Data (Trends)	YES	If FY 2022, five Hispanics filed a complaint of which four were females and one was male.
Grievance Data (Trends)	YES	In FY 2022, there were 23 grievances filed, of which 1 was a Hispanic male.
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	NO	
Climate Assessment Survey (e.g., FEVS)	NO	
Exit Interview Data	NO	The exit survey questions were revised in FY 2022; data will be captured in FY 2023.
Focus Groups	NO	There were no focus groups specifically for Hispanic/Latino employees.
Interviews	NO	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	NO	
Other (Please Describe)	NO	

**Status of Barrier Analysis Process**

<b>Barrier Analysis Process Completed? (Yes or No)</b>	<b>Barrier(s) Identified? (Yes or No)</b>
NO	YES

**Statement of Identified Barrier(s)**

<b>Description of Policy, Procedure, or Practice</b>
The Agency continued to work on the low participation rates of Hispanics. In FY 2022, the EEOP with the support of HRD was committed to identifying and minimizing potential barriers to improve the representation of Hispanics within the Agency.

**Objective(s) and Dates for EEO Plan**

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

**Responsible Official(s)**

<b>Title</b>	<b>Name</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>
Director, Equal Employment Opportunity Programs	Pamela R. Sullivan	NO
Chief Human Resources Officer/HRD	Christine N. Nalli	NO

**Planned Activities Toward Completion of Objective**

<b>Target Date</b>	<b>Planned Activities</b>	<b>Modified Date</b>	<b>Completion Date</b>
05/01/2022	Develop and implement a recruitment plan and monitor results such as applicant flow data.		
07/01/2022	Utilize DefenseReady as a mechanism to track information of Agency vacancies to include recruitment as available.		
10/01/2022	Continue to analyze separation data and explore correlation between length of service and separation.		
12/31/2022	Obtain Nature of Action Code for separation and review to		

Target Date	Planned Activities	Modified Date	Completion Date
	determine why Hispanics are leaving the Agency.		

**Report of Accomplishments**

FY	Accomplishments
FY 2022	<p>PFPA DEIA WG members participate in the National Council for Hispanic Employee Program Managers and greatly benefit from sharing resources in recruitment, education, and public outreach.</p> <p>PFPA Human Capital Program Management (HCPM) and RMFC will begin building relationships with Hispanic universities, professional organizations, and communities for targeted recruiting efforts.</p> <p>Cost Assessment and Program Evaluation (CAPE) hosted two Hispanic interns this summer; leveraging diversity postings and social media to attract applicants.</p> <p>In FY 2023, WHS will continue its outreach, recruitment, hiring, and career development initiatives by creating opportunities for growth and advancement to retain Hispanic talent.</p> <p>WHS plans to participate in upcoming virtual conferences and career expos sponsored by and/or targeted at Hispanic organizations, including:</p> <ul style="list-style-type: none"> <li>• National Society of Hispanic MBAs (NSHMBA)</li> <li>• National Congress of American Indians</li> <li>• Society of Hispanic Professional Engineers (SHPE)</li> <li>• American Indian Science and Engineering Society (AISES)</li> <li>• Equal Opportunity Publications Careers and the Disabled Career Expo</li> <li>• League of United Latin American Citizens (LULAC); and</li> <li>• Hispanic Association of Colleges and Universities (HACU)</li> </ul>

## 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 persons with disabilities (PwD) and persons with targeted disabilities (PwTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their 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 (PwD) | Yes 0 | No X |
| b. Cluster GS-11 to SES (PwD)  | Yes 0 | No X |

The percentage of PwD in the GS-1 to GS-10 cluster was 16.40% and the percentage of PwTD in the GS-11 to SES was 12.79%, which exceeds above the goal of 12%.

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

- |                                 |       |      |
|---------------------------------|-------|------|
| a. Cluster GS-1 to GS-10 (PwTD) | Yes X | No 0 |
| b. Cluster GS-11 to SES (PwTD)  | Yes X | No 0 |

The percentage of PwTD in the GS-1 to GS-10 cluster was 3.17% (6) and the percentage of PwTD in the GS-11 to SES was 2.60% exceeding the goal of 2%.

Grade Level Cluster (GS or Alternate Pay Plan B)	Total		Reportable Disability		Targeted Disability	
	#	#	%	#	%	
Numerical Goal			12%		2%	
Grades GS-1 to GS 10	189	31	16.40	6	3.17	
Grades GS-11 to SES	2580	330	12.79	67	2.60	

- 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 Diversity Training), quarterly newsletter, quarterly Leadership meetings, WRP, 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 **X**      No **0**

N/A

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PwD and PwTD	2	0	3	Ericka Deas-Johnson, HR Specialist Disability Recruitment ericka.deas-johnson.civ@mail.mil
Answering questions from the public about hiring authorities that take disability into account	3	0	3	Ericka Deas-Johnson, HR Specialist Disability Recruitment ericka.deas-johnson.civ@mail.mil
Processing reasonable accommodation requests from applicants and employees	2	0	2	Edna E Johnson Ph.D. Disability & Reasonable Accommodation Program Manager Edna.e.johnson6.civ@mail.mil
Section 508 Compliance	1	0	4	glenn.t.buchter.civ@mail.mil
Architectural Barriers Act Compliance	3	0	0	WHS.Accessibility@mail.mil

Special Emphasis Program for PwD and PwTD	3	0	3	Ericka Deas-Johnson, HR Specialist Disability Recruitment ericka.deas-johnson.civ@mail.mil
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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 X      No 0

Disability Program Manager (EEOC), ADA, and RA Training (NELI).

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

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

Yes X      No 0

N/A

**Section III: Plan to Recruit and Hire Individuals with Disabilities**

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

**A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES**

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

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 IwDs and IwTDs through various programs (i.e., WRP, Wounded Warriors, and Schedule A).

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

Inclusion of a specific statement in vacancy announcements related to Special Appointing Authorities, including veterans with a disability rating of 30% or more, with links to informative webpages that further explain and clarify those appointment types. Continue utilization of special hiring authorities and job development programs for veterans, to include veterans with a disability rating of 30% or more. To this end, HRD will continue to educate hiring managers on the use of special appointing authority for 30% or more disabled Veterans. Additionally, WHS will seek to include veteran employees with

disabilities as recruitment and outreach consultants. Continued utilization of OPM shared (Bender) list to place individuals with reportable and targeted disabilities.

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.

WHS created a searchable applicant database which can be used for Disabled Veterans, Pathways Interns, and recent graduates. Applicants must submit all supporting documentation to SEP employees, who verify eligibility before adding applicants to the WHS database. Efforts to improve the use of the database are ongoing.

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

Yes X      No 0      N/A 0

WHS utilized a variety of methods to include Training (HR and Leadership for New Supervisors; annual EEO and Diversity Training), quarterly newsletter, quarterly Leadership meetings, and the annual policy.

## **B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS**

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

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 PwD and 2% for PwTD as the benchmarks, do triggers exist for PwD and/or PwTD among the new hires in the permanent workforce? If "yes", please describe the triggers below.

a. New Hires for Permanent Workforce (PwD)	Yes X	No 0
b. New Hires for Permanent Workforce (PwTD)	Yes X	No 0

In FY 2022, the Agency hired 31 employees who reported having a disability and five who reported having a targeted disability. PwTDs comprised 1.59% of the workforce of WHS and Served Components. Employees with reportable disabilities were 9.84% of the total workforce, compared to

9.79% at the end of FY 2021. 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 PwD and/or PwTD among the new hires for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

a. New Hires for MCO (PwD)	Yes X	No 0
b. New Hires for MCO (PwTD)	Yes X	No 0

Among the new hires with disabilities who voluntarily identified their disability, triggers existed for PwDs in the following most populous MCOs: Series 1102 – 141 total applicants and 134 total qualified applicants, 0 selected, a disparity in those who applied versus those who qualified among PwDs. Among the new hires with disabilities who voluntarily identified their disability, triggers existed for PwTDs MCOs: Series 1102 – six applicants, zero qualified, and zero selected.

3. Using the relevant applicant pool as the benchmark, do triggers exist for PwD and/or PwTD among the qualified *internal* applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

a. Qualified Applicants for MCO (PwD)	Yes X	No 0
b. Qualified Applicants for MCO (PwTD)	Yes X	No 0

Among the qualified internal applicants with disabilities who voluntarily identified their disability, triggers existed for PwD in the following series:

- Series 0080 MCO – 6.05% of applicants, 3.95% of applicants, and 0.00% of selected applicants.
- Series 0083 MCO – 3.51% of applicants and 5.00% of qualified applicants, and 0.00% of selected applicants.
- Series 0301 MCO – 6.65% of applicants and 6.83% of qualified applicants, and 0.00% of selected applicants.
- Series 0343 MCO – 6.68% of applicants and 7.51% of qualified applicants, and 5.56% of selected applicants.
- Series 1102 MCO – 6.52% of applicants and 4.35% of qualified applicants, and 0.00% of selected applicants.

Among the qualified internal applicants with disabilities, who voluntarily identified their disability, triggers existed for PwTD in the following series:

- Series 0080 MCO – 3.63% of applicants, 2.63% of applicants, and 0.00% of selected applicants.
- Series 0083 MCO – 1.75% of applicants and 3.33% of qualified applicants, and 0.00% of selected applicants.
- Series 0301 MCO – 4.96% of applicants and 5.46% of qualified applicants, and 0.00% of selected applicants.
- Series 0343 MCO – 5.70% of applicants and 0.00% of qualified applicants, and 0.00% of selected applicants.
- Series 1102 MCO – 3.00% of applicants and 6.52% of qualified applicants, and 0.00% of selected applicants.

4. Using the qualified applicant pool as the benchmark, do triggers exist for PwD and/or PwTD among employees promoted to any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

a. Promotions for MCO (PwD)	Yes X	No 0
b. Promotions for MCO (PwTD)	Yes X	No 0

In comparison to the benchmarks, triggers exist among the selections for promotion involving the following positions in FY 2022.

- Police Officer (0083):** PwD (2.72%) and PwTD (0.00%)
- Foreign Affairs (0130):** PwD (4.31%) and PwTD (0.00%)
- Miscellaneous Administration and Program (0301):** PwTD (1.59%)
- Contracting (1102):** PwD (11.17%) and PwTD (1.12%)
- Information Technology Management (2210):** PwD (11.54%)

## 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 PwD, including PwTD, have sufficient opportunities for advancement.

The SEP endeavor to place PwDs and PwTDs employees in billets that has 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, to including assessment tools, leadership development workshops (Leading at the Speed of Trust), assessment tools (Myers Briggs, StrengthsFinder, 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		PwD		PwTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs						

Fellowship Programs						
Mentoring Programs						
Coaching Programs						
Training Programs						
Detail Programs						
Other Career Development Programs						

3. Do triggers exist for PwD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees). If “yes”, describe the trigger(s) in the text box.

- |                     |       |      |     |
|---------------------|-------|------|-----|
| a. Applicants (PwD) | Yes 0 | No 0 | N/A |
| b. Selections (PwD) | Yes 0 | No 0 | N/A |

In FY 2022, triggers exist for PwD in all of the career development programs.

4. Do triggers exist for PwTD among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

- |                      |       |      |     |
|----------------------|-------|------|-----|
| a. Applicants (PwTD) | Yes 0 | No 0 | N/A |
| b. Selections (PwTD) | Yes 0 | No 0 | N/A |

In FY 2022, triggers 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 PwD and/or PwTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

- |   |       |      |
|---|-------|------|
| a. Awards, Bonuses, and Incentives (PwD)  | Yes X | No 0 |
| b. Awards, Bonuses, and Incentives (PwTD) | Yes X | No 0 |

Triggers were identified for the following awards:

- **Cash awards \$500 and under:** The average award amount for PwDs and PwTDs is lower than the average award amount for all recipients.
- **Cash awards between \$501 and \$999:** The average award amount for PwDs and PwTDs is

lower than the average award amount for all recipients.

- **Cash awards between \$1,000 and \$1,999:** The average award amount for PwDs and PwTDs is lower than the average award amount for all recipients.
- **Cash awards between \$4,000 and \$4,999:** The average award amount PwTDs is lower than the average award amount for all recipients.
- **Cash awards greater than \$5,000:** The average award amount for PwDs and PwTDs is lower than the average award amount for all recipients.

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

a. Pay Increases (PwD)	Yes X	No 0
b. Pay Increases (PwTD)	Yes X	No 0

Triggers were identified for the following awards:

- Thirty-five (11.22%) PwDs and five (1.60%) PwTDs received Quality Step Increases.

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

- Thirty-nine (8.25%) PwDs and three (0.63%) PwTDs received performance-based pay increases: PwDs and PwTDs are significantly lower than the average award amount for all recipients.

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

a. Other Types of Recognition (PwD)	Yes 0	No 0	N/A
b. Other Types of Recognition (PwTD)	Yes 0	No 0	N/A

Data is not available at this time.

## D. PROMOTIONS

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

a. SES			
i. Qualified Internal Applicants (PwD)	Yes	0	No 0
ii. Internal Selections (PwD)	Yes	0	No 0
b. Grade GS-15			
i. Qualified Internal Applicants (PwD)	Yes	0	No 0
ii. Internal Selections (PwD)	Yes	0	No 0
c. Grade GS-14			
i. Qualified Internal Applicants (PwD)	Yes	0	No 0
ii. Internal Selections (PwD)	Yes	0	No 0
d. Grade GS-13			
i. Qualified Internal Applicants (PwD)	Yes	0	No 0
ii. Internal Selections (PwD)	Yes	0	No 0

Data not available.

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

- a. SES
  - i. Qualified Internal Applicants (PwTD)                      Yes 0                      No 0
  - ii. Internal Selections (PwTD)                                      Yes 0                      No 0
- b. Grade GS-15
  - i. Qualified Internal Applicants (PwTD)                      Yes 0                      No 0
  - ii. Internal Selections (PwTD)                                      Yes 0                      No 0
- c. Grade GS-14
  - i. Qualified Internal Applicants (PwTD)                      Yes 0                      No 0
  - ii. Internal Selections (PwTD)                                      Yes 0                      No 0
- d. Grade GS-13
  - i. Qualified Internal Applicants (PwTD)                      Yes 0                      No 0
  - ii. Internal Selections (PwTD)                                      Yes 0                      No 0

Data not available.

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

- a. New Hires to SES (PwD)                                      Yes 0                      No 0
- b. New Hires to GS-15 (PwD)                                      Yes 0                      No 0
- c. New Hires to GS-14 (PwD)                                      Yes 0                      No 0
- d. New Hires to GS-13 (PwD)                                      Yes 0                      No 0

Data not available.

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

- a. New Hires to SES (PwTD)                                      Yes 0                      No 0
- b. New Hires to GS-15 (PwTD)                                      Yes 0                      No 0
- c. New Hires to GS-14 (PwTD)                                      Yes 0                      No 0
- d. New Hires to GS-13 (PwTD)                                      Yes 0                      No 0

Data not available

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

a. Executives

i. Qualified Internal Applicants (PwD)      Yes 0      No 0

ii. Internal Selections (PwD)      Yes 0      No 0

b. Managers

i. Qualified Internal Applicants (PwD)      Yes 0      No 0

ii. Internal Selections (PwD)      Yes 0      No 0

c. Supervisors

i. Qualified Internal Applicants (PwD)      Yes 0      No 0

ii. Internal Selections (PwD)      Yes 0      No 0

Data not available.

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

a. Executives

i. Qualified Internal Applicants (PwTD)      Yes 0      No 0

ii. Internal Selections (PwTD)      Yes 0      No 0

b. Managers

i. Qualified Internal Applicants (PwTD)      Yes 0      No 0

ii. Internal Selections (PwTD)      Yes 0      No 0

c. Supervisors

i. Qualified Internal Applicants (PwTD)      Yes 0      No 0

ii. Internal Selections (PwTD)      Yes 0      No 0

Data not available.

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

a. New Hires for Executives (PwD)	Yes 0	No 0
b. New Hires for Managers (PwD)	Yes 0	No 0
c. New Hires for Supervisors (PwD)	Yes 0	No 0

Data not available.
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8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PwTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box.

a. New Hires for Executives (PwTD)	Yes 0	No 0
b. New Hires for Managers (PwTD)	Yes 0	No 0
c. New Hires for Supervisors (PwTD)	Yes 0	No 0

Data not available.
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## Section V: Plan to Improve Retention of Persons with Disabilities

To be a model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the 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 two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If “no”, please explain why the agency did not convert all eligible Schedule A employees.

Yes X      No 0      N/A 0

The Agency has not established a system to monitor the status of Schedule A employees with disabilities. The Agency plans to implement a tracking system in FY 2023.
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2. Using the inclusion rate as the benchmark, did the percentage of PwD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.

- |                                  |       |      |
|----------------------------------|-------|------|
| a. Voluntary Separations (PwD)   | Yes 0 | No X |
| b. Involuntary Separations (PwD) | Yes 0 | No X |

In FY 2022, 9.03% of PwDs separated the Agency, and 1.97% of PwTDs separated the Agency. For PwDs, there were 25.00% removal, 7.12% resignation, and 12.44% retirement.

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

- |                                   |       |      |
|-----------------------------------|-------|------|
| a. Voluntary Separations (PwTD)   | Yes 0 | No X |
| b. Involuntary Separations (PwTD) | Yes 0 | No X |

The Agency had 1.97% of PwTDs separate the Agency. For PwTDs, there were 12.50% removal, 1.19% resignation, and 1.99% retirement.

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

The Agency revised the exit survey in FY 2022. In FY 2023, the Agency plans to implement a system to collect and analyze exit interview data.

## **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 of Diversity, Equity, and Inclusion (ODEI) – <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.

For questions or concerns about architectural barriers, individuals may visit <https://my.whs.mil/services/accessibility>. Individuals may visit; <https://www.whs.mil/Directorates/WHS-Immediate-Office-Staff/EEOP/EEO-Laws-and-Regulations/> for specific rights under the Architectural Barriers Act, but complaints must be addressed to the DoD Office of Diversity Management and Equal Opportunity (ODMEO). <https://my.whs.mil/services/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.

Installed curb cuts at Mark Center kiss and ride; developed a revised Mark Center evacuation strategy for PwD; addressed installation of a relief area for service animals; continuing to study alternative mobility access options that are more feasible for the Mark Center location; publication of tactile maps at the Pentagon to assist visually impaired individuals.

### **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 2022 were 20 days including receiving and reviewing of medical documentation. The process had to adapt to minor changes due to the COVID-19 pandemic, which included reduced training of employees and supervisors. Further, due to WHS HRD reorganization, the RA program relocated under the management of the Labor Management and Employee Relations (LMER) Division. However, the RAPM, the Assistant Director, LMER, and the Employee Relations 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 timely processes RA requests and timely approve accommodations. RA training for managers and supervisors is an integral part of the following training: HR and Leadership for New Employees, and LMER and EEO Diversity and Inclusion Training 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 finalized the PAS policy as part of the AI 114, “Reasonable Accommodation for Individuals with Disabilities” Issuance that is currently in the review stage. 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 PwD file a formal EEO complaint alleging harassment, as compared to the government-wide average?

Yes 0          No X          N/A 0

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 0          No X          N/A 0

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 2022, there were no findings of discrimination, as a result of harassment, based on disability status.

### B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Yes 0          No X          N/A 0

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

Yes 0          No X          N/A 0

- 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 2022, PFPA implemented a policy in an effort to better accommodate the affected individuals involved.

## 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.

- Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PwD and/or PwTD?

Yes 0      No X

- Has the agency established a plan to correct the barrier(s) involving PwD and/or PwTD?

Yes 0      No X      N/A 0

- 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.

<b>Trigger 1</b>	<p>Promotion of PwDs and PwTDs into Managerial Positions</p> <p><b>Table B3: Occupational Categories by Disability</b></p> <p>Trigger(s): Executive/Senior Level is below the goal of 12% for PwDs (9/4.74%).</p> <p>Trigger(s): Executive/Senior Level is below the goal of 2% for PwTDs (0/0.00%).</p> <p>Trigger(s): Out of 8 occupational categories, 4 are below the goal of 12% for PwDs. Professionals (9.40%), Technicians (11.94%), Craft Workers (4.94%), and Service Workers (3.07%).</p> <p>Four of the eight occupational categories are below the 2% goal for PwTDs. Professionals (1.55%), Technicians (1.49%), Craft Workers (0.00%), and Service Workers (0.13%).</p> <p><b>Table B4: General Schedule (GS) Grades by Disability</b></p> <p>Trigger(s): GS-14 cluster (52 employees) is below the PwDs 12% goal at 10.51%.</p>
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	<p>Trigger(s): GS-15 cluster (86 employees) is below the PwDs 12% goal at 8.99%.</p> <p>Trigger(s): SES cluster (11 employees) is below the PwDs 12% goal at 4.28%.</p> <p>Trigger(s): GS-14 cluster (5 employees) is below the PwTDs 2% goal at 1.01%.</p> <p>Trigger(s): SES cluster (0 employees) is below the PwTDs 2% goal at 0.00%.</p> <p><b>Table B6: Mission-Critical Occupations by Disability</b></p> <p>Trigger(s): PwDs is below the 12% goal in the 0083, 0130, and 1102 series.</p> <p>Trigger(s): PwTDs is below the 2% goal in the 0083, 0130, 0301, and 1102 series.</p>
<p><b>Trigger 2</b></p>	<p>Permanent Workforce by Component</p> <p><b>Table B2: Permanent Workforce by Component</b></p> <p>Trigger(s): Office of the Secretary of Defense (OSD) (1,650 employees) is below the PwDs benchmark of 12% at 9.39%.</p> <p>Trigger(s): Defense Legal Services Agency (DLSA) (136 employees) is below the PwDs benchmark of 12% at 9.56%.</p> <p>Trigger(s): Defense Test Resources Management Center (DTRMC) (20 employees) is below the PwDs benchmark of 12% at 5.00%.</p> <p>Trigger(s): Office of Economic Adjustment (OEA) (35 employees) is below the PwDs benchmark of 12% at 2.86%.</p> <p>Trigger(s): Pentagon Force Protection Agency (PFPA) (1086 employees) is below the PwDs benchmark of 12% at 6.72%.</p> <p>Trigger(s): U.S. Court of Appeals for the Armed Forces (USCAAF) (24 employees) is below the PwDs benchmark of 12% at 0.00%.</p> <p>Trigger(s): Defense Technology Security Administration (DTSA) (122 employees) is below the PwDs benchmark of 12% at 6.56%.</p> <p>Trigger(s): Office of the Secretary of Defense (OSD) (1,650 employees) is below the PwTDs benchmark of 2% at 1.82%.</p> <p>Trigger(s): Defense Legal Services Agency (DLSA) (140 employees) is below the PwDs benchmark of 12% at 0.71%.</p> <p>Trigger(s): Office of Economic Adjustment (OEA)/Office of Local Defense Community Cooperation (OLDCC) (37 employees) is below the PwTDs benchmark of 2% at 0.00%.</p> <p>Trigger(s): Pentagon Force Protection Agency (PFPA) (1074 employees) is below the PwTDs benchmark of 2% at 0.00%.</p> <p>Trigger(s): U.S. Court of Appeals for the Armed Forces (USCAAF) (23 employees) is</p>

	below the PwTDs benchmark of 2% at 0.00%.	
	Trigger(s): Defense Technology Security Administration (DTSA) (127 employees) is below the PwTDs benchmark of 2% at 0.79%.	
<b>Trigger 3</b>	<p>Recognition and Awards by Disability</p> <p><b>Table B9: Employee Recognition and Awards by Disability</b></p> <p>Trigger(s): There are triggers in the following award categories: Time off 11-20, 21-30, and 31-40 hours), and Cash Awards (\$100-\$500, \$501-\$999, \$2,000-\$2,999, \$3,000-\$3,999, \$4,000-\$4,999 and \$5,000-more) where the inclusion rate of PwDs receiving awards is lower than the inclusion rate of persons without disabilities receiving awards.</p> <p>Trigger(s): There are triggers in the following award categories Time off (1-10 and 31-40 hours), and Cash Awards (\$3000-\$3999, and \$5000-more) where the inclusion rate of PwDs receiving awards is lower than the inclusion rate of people without disabilities receiving awards.</p> <p>Trigger(s): There is a trigger in Quality Step Increases (QSIs) where the inclusion rate of PwDs and PwTDs receiving QSIs is lower than the inclusion rate of people without disabilities receiving QSI's.</p>	
<b>Barrier(s)</b>	None	
<b>Objective(s)</b>		
<b>Responsible Official(s)</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>	
Erika Deas-Johnson, Supervisor Special Employment Programs Branch, HRD	No	
<b>Barrier Analysis Process Completed? (Yes or No)</b>	<b>Barrier(s) Identified? (Yes or No)</b>	
No	No	
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Workforce Data Tables	YES	Table B3: Occupational Categories by Disability; Table B4: General Schedule (GS) Grades by Disability, Table B6: Mission Critical Occupations by Disability
Complaint Data (Trends)	YES	In FY 2022, 44 complaints were filed, of which 15 were PwDs; 9 males and 6 females.
Grievance Data (Trends)	YES	In FY 2022, 23 grievances were filed, of which, 3 employees were identified as having a disability. There were no PwTDs.
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	NO	
Climate Assessment Survey (e.g., FEVS)	NO	
Exit Interview Data	NO	The exit survey questions were revised in FY

		2022; data will be captured in FY 2023.		
Focus Groups	NO	No focus groups were conducted for IwDs in FY 2022.		
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
06/01/2023	Update the EEO external website to include 504/508 complaint information in the Disability Outreach section.	YES		
08/30/2023	Collaborate with HRD to identify whether triggers exist within the Career Development Program for PwDs and PwTDs.	YES		
9/30/2023	Develop a Disability Newsletter for WHS Agency	YES		
9/30/2023	Collaborate with HRD to create a drive for WHS employees to update their SF 256	YES		
10/31/2023	Establish Disability Working Group	YES		
FY	Accomplishments			
2022	<p>The EEOP collaborated 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 organizations to provide guidance, training, and awareness of special hiring authorities, including Veterans Recruitment Appointment (VRA), Veterans Employment Opportunities Act (VEOA), Schedule A, and other competitive hiring authorities. In FY 2022, SEP continued to promote Schedule A Hiring Authority and the Workforce Recruitment Program (WRP) to their customers. Diversity Management Operations Center (DMOC) funding has allowed SEP to bring on board 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</p>			

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 Senior Executive Diversity Seminars (SEDS).

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.

EEOP placed an article in the Summer 2022 Personnel Hilites encouraging the WHS workforce to update their race, ethnicity and disability status to ensure the accuracy of the agency's workforce. Self-identifying of the disability status is essential for effective data collection and analysis of the WHS' efforts. It is also key in determining funding requests for disability and reasonable accommodation programs.

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 fiscal year.

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