

Management Directive 715 (MD-715) FY 2021 Status Report and FY 2022 Plan



WASHINGTON HEADQUARTERS SERVICES

4800 Mark Center Drive  Alexandria VA 22350-3400

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

Washington Headquarters Services (WHS) and WHS-Serviced Components

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For period covering October 1, 2020 to September 30, 2021

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 | 4,612 | 659 | 5,271 |

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

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

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

| EEO Program Staff | Name | Title | Series | Pay Plan and Grade | Phone Number | Email Address |
|--|--------------------|----------------------------|--------|--------------------|--------------|----------------------------------|
| Principal EEO Director/Official | Pamela R. Sullivan | EEO Director | GS-260 | 15 | 571-372-2222 | pamela.r.sullivan2.civ@mail.mil |
| Affirmative Employment Program 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 & Inclusion Officer | James Parker | D&I Officer | GS-260 | 14 | 571-372-0844 | james.a.parker290.civ@mail.mil |
| Disability Program Manager (SEPM) | Dr. Edna Johnson | Disability Program Manager | GS-201 | 13 | 571-372-4034 | edna.e.johnson6.civ@mail.mil |
| Special Placement | Ericka Deas- | SEP Branch, | GS-201 | 14 | 571-372- | Ericka.deas.johnson.civ@mail.mil |

| EEO Program Staff | Name | Title | Series | Pay Plan and Grade | Phone Number | Email Address |
|---|------------------|----------------------------|---------------|---------------------------|---------------------|--------------------------------|
| Program Coordinator (Individuals with Disabilities) | Johnson | Supervisor | | | 4092 | |
| Reasonable Accommodation Program Manager | Dr. Edna Johnson | Disability Program Manager | GS-201 | 13 | 571-372-4034 | edna.e.johnson6.civ@mail.mil |
| Anti-Harassment Program Manager | N/A | N/A | N/A | N/A | N/A | N/A |
| ADR Program Manager | James Parker | ADR Program Manager | GS-260 | 14 | 571-372-0844 | james.a.parker290.civ@mail.mil |
| Compliance Manager | Patrick Anderson | Complaints 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 |
| Other EEO Staff | | | | | | |

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

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

| Subordinate Component | City | State | Agency Code | FIPS Codes |
|--|-------------|--------------|--------------------|-------------------|
| Office of the Secretary of Defense (OSD) | Arlington | VA | DD01 | 8840 |
| Defense Test Resources Management Center (DTRMC) | Arlington | VA | DD68 | 8840 |
| Defense Legal Services Agency (DLSA) | Arlington | VA | DD25 | 8840 |
| Office of Local Defense Community Cooperation (OLDCC); formerly known as Office of Economic Adjustment (OEA) | Arlington | VA | DD23 | 8840 |
| Pentagon Force Protection Agency (PFPA) | Arlington | VA | DD65 | 8840 |
| U.S. Court of Appeals for the Armed Forces (USCAAF) | Arlington | VA | DD08 | 8840 |
| Defense POW/MIA Accounting Agency (DPAA) | Arlington | VA | DD58 | 8840 |
| Defense Technology Security Administration | Arlington | VA | DD29 | 8840 |

| Subordinate Component | City | State | Agency Code | FIPS Codes |
|--|------------|-------|-------------|------------|
| (DTSA) | | | | |
| Defense Advanced Research Project Agency (DARPA) | Arlington | VA | DD13 | 8840 |
| Washington Headquarters Services (WHS) | Alexandria | VA | DD21 | 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 | |
| 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

Washington Headquarters Services (WHS) is the essential services provider for the Office of the Secretary of Defense (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 2019, WHS was aligned under the day-to-day direction of the Directorate of Administration and Organizational Policy (DA&OP) in the Office of the Chief Management Officer (CMO) of the DoD. Subsequently, Section 901 of the William M. “Mac” Thornberry National Defense Authorization Act for FY 2021 (H.R. 6395) abolished the position of CMO of the DoD effective January 1, 2021. The Deputy Secretary of Defense directed the re-establishment of the Office of the Director of Administration and Management (ODA&M) on January 11, 2021. The responsibilities, functions, and resources of the DA&OP in the Office of the CMO were realigned to the re-established ODA&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 Acting 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 Equal Employment Opportunity Process, information and referral services for the Military Equal Opportunity process, Affirmative Employment Program, Alternative Dispute Resolution Program, and Diversity and Inclusion initiatives. The current staff consists of an EEOP Director, two Program Managers, and 10 EEO specialists.

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 2021 (FY 2021).

ELEMENT 1: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP:

EEO Policies and Procedures Communicated to the Workforce: The Agency 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.

Diversity and Inclusion: In accordance with DoD policy and Agency needs, the Pentagon Force Protection Agency (PFPA) launched the Diversity and Inclusion Working Group (DIWG) to develop a sound support structure to accomplish these goals. The DIWG is comprised of a diverse group of: PFPA employees at all levels; the PFPA Ombudsman; WHS Labor Management and Employee Relations representatives; Aspiring Leaders Program/Leading Police Organizations graduates; and representatives from the Office of General Counsel and EEOP. The purpose of this Working Group is to develop recommendations for a long-term and robust D&I Program, tailored to meet the needs of its highly specialized workforce, which will position the Agency to evolve into an organization known for its diverse and inclusive culture.

ELEMENT 2. INTEGRATION INTO AGENCY'S STRATEGIC MISSION:

EEO Director Involvement: The EEOP Director reports directly to the Director of WHS, with whom she met with on a weekly basis in FY 2021. 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 Director also attended the Mark Center Building Council meetings to maintain awareness of facilities logistics as relates to architectural barriers.

Recruitment: WHS heavily engaged with hundreds of race, disability, and gender-based groups at a range of universities. Engagement involved passing along opportunities, information, and specific invitations to attend small recruiting events being conducted on campus.

Special Hiring Authorities: WHS encouraged the use of available hiring authorities, such as Schedule A Excepted Service Hiring Authority (5 CFR 213.3102(u)), Veterans Recruitment Appointment authority, the Workforce Recruitment Program for College Students and Recent Graduates with Disabilities (WRP), reasonable accommodations, and operationalizing accessible information and communication technology policies, practices, and procedures. The WHS Acquisition Directorate accommodated onboarding Wounded Warriors' growing needs to prepare them for conversion to the 1102 career field as competitive acquisition professionals.

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. In FY 2021, the Agency managed approximately 40 RA cases due to Coronavirus (COVID-19) restrictions that mandated telework versus onsite operations, which significantly reduced accommodation requests for office-related ergonomic support, compared to 89 cases in FY 2020. All requests for RA were processed within the 30-day timeframe are required by Administrative Instruction 114 (AI 114).

WHS Pentagon Scooter Program: The Program provides DoD personnel and contractors at the Pentagon with access to electric scooters to travel the corridors of the Pentagon for up to 90 days annually. Customers can utilize the Program for a short or long-term basis. For long-term usage, customers are required to submit a recommendation from a licensed healthcare professional. In FY 2021, despite the COVID-19 pandemic, this Program assisted approximately 32 employees.

American Sign Language Interpreting Program (ASLIP): WHS ASLIP team offers both American Sign Language interpreting and reader support services to employees with disabilities for workplace meetings, trainings, phone calls, workshops and special events. The team is comprised of seven nationally certified staff interpreters and one staff assistant reader. Currently, WHS provides RA to 11 employees (nine deaf and two blind) through the ASLIP; services are delivered in-person and virtually 5 days per week, 10.5 hours per day ensuring full and equal access to communication with co-workers, supervisors, customers, and leadership. The ASLIP team delivered uninterrupted services, during the onset of the COVID-19 pandemic, utilizing all available resources to preclude gaps in coverage, as employees transitioned to maximum telework. The team has since been strategic and resourceful, throughout the pandemic, in an effort to mitigate any risk of service interruption. In addition to providing RAs, the ASLIP education 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

WHS Facility Accessibility Task Force (FATF): WHS 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 who are 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.

Special Employment Programs: In support of recruiting and employing diverse talent, WHS engaged in targeted talent acquisition efforts to seek out and hire qualified candidates. Diversity, Disability, and Recruitment (DDR) actively collaborated with WHS serviced organizations, promoted the benefits and value of SEPs, and shared Office of Personnel (OPM) resources to recruit, hire, and retain PwDs, Hispanics, and under-represented groups. DDR work with hiring managers, Customer Account Managers (CAMs), and WHS serviced organization customers to provide guidance, training, and awareness of special hiring authorities to include: Schedule A, Pathways Program, Volunteer Student Internship Programs

(VSIP) and other competitive hiring authorities.

Understanding the benefits and value of SEPs to recruit and hire talent, PFFA reestablished the use of the Wounded Warrior Program and the Volunteer Student Internship Programs (VSIP). WHS has formed partnerships with the OPM Federal Exchange on Employment and Disability Community of Practice and the Workforce Recruitment Program (WRP), as well as several others. These partnerships offer recruitment and referral programs that connect Federal employers (nationwide) with qualified college students, recent graduates, and recently disabled individuals, providing these individuals with an opportunity to demonstrate their abilities in the workplace through internships and permanent job placement.

Demographic Dashboards: The DDR provided leadership reports on persons with targeted disabilities (PwTDs) and highlighted those components that had met or exceeded our goal of 2% employees with targeted disabilities. EEO also implemented its goal of providing each WHS component with a demographic analysis of the component's populations to inform workforce planning to include recruiting and succession planning. The demographic dashboard includes the following analyses: overall race, gender, national origin (RGNO); senior grades by RGNO and disability status; major occupations by RGNO and disability status; onboard ratio of individuals with targeted and reportable disabilities; veterans; generations; and retirement eligibility.

WHS provides PFFA leadership with demographic dashboard reports and analysis of the workforce populations. This information is utilized to inform workforce planning, which includes recruiting and succession planning. The demographic dashboard includes the following analyses: overall race, gender, national origin (RGNO); senior grades by RGNO and disability status; major occupations by RGNO and disability status; onboard ratio of individuals with targeted and reportable disabilities; veterans; generations; and retirement eligibility.

EEO Annual Training for Supervisors and Employees: In FY 2021, WHS continued to provide EEO training for all supervisors and employees. The training included the Complaints process, AH process, ADR, and EEO laws and guidance. The following breakdown is as follows.

| Training | Attendees |
|---|------------------|
| EEO and Anti-Harassment for Supervisors | 323 |
| EEO and Anti-Harassment for Non-Supervisors | 87 |
| Basics of Conflict Management for Supervisors | 157 |
| Basics of Conflict Management for Non-Supervisors | 31 |
| EEO and Diversity in the Workplace | 830 |
| No FEAR Act (online) Training | 4,469 |
| No FEAR Act New Employee Training | 830 |
| Total | 6,727 |

ELEMENT 5. EFFICIENCY

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

Complaints (Status and Update): During FY 2021, 65 pre-complaints resulted in 35 individuals filing formal complaints. There were 17 settlements and 21 withdrawals (no complaints filed). In FY 2020, there

were 11 settlements compared to FY 2021, there were 6 successful settlements.

Most of the formal EEO complaints were based on claims of race, disability, reprisal, sex, and/or age discrimination. ADR was offered 22 times (reflecting approximately a 34% offer rate) and 22 individuals (100%) accepted ADR. The Agency continued to utilize the MicroPact iComplaints software to track and process complaints, in accordance with regulatory timelines.

ADR Program: The ADR Program provided essential services that contribute to the WHS mission by providing management and employees various methods to resolve disputes, address workplace concerns, and manage conflict when it arises. Additionally, the ADR Program provided managers with services to assist in assessing the workplace environment so that issues can be addressed early. In FY 2021, the ADR Program office conducted 17 mediations to address EEO complaints of alleged discrimination and 13 sessions to address non-EEO workplace issues. The Program also supported the DoD Shared Neutral Program by facilitating eight mediations outside of its serviced population. Additionally, the Program facilitated seven climate surveys, three listening sessions, three group facilitations, and one sensing session. Other activities included conducting 16 training sessions titled "Basics of Conflict Management." Due to COVID-19 restrictions, EEOP did not host its annual ADR and Conflict Management Symposium in FY 2021. However, a virtual event for the first quarter of FY 2022 titled "The Changing Landscape of ADR and Conflict Management" has been scheduled. 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 necessary 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, 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.

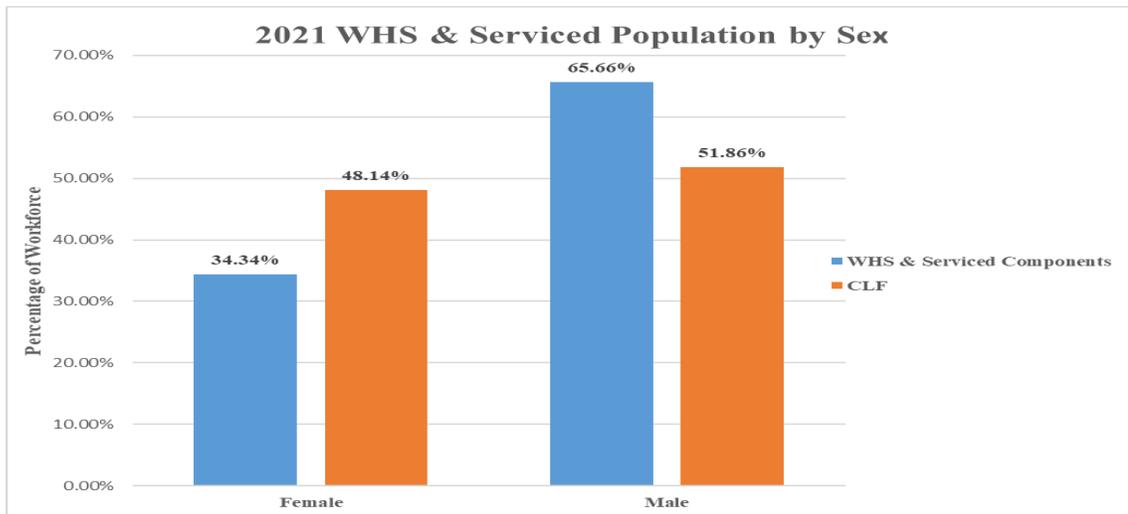
Part E.3 - Executive Summary: Workforce Analyses

WORKFORCE ANALYSIS

In FY 2021, 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)¹ census data was used as a benchmark.

At the end of FY 2021, the total workforce (permanent and temporary) of WHS and Serviced Components decreased from 5,501 to 5,271, representing a net change of -4.18%. The overall workforce consists of 3,461 (65.66%) males and 1,810 (34.34%) females, representing a net change of -6.54 and -0.67, respectively.

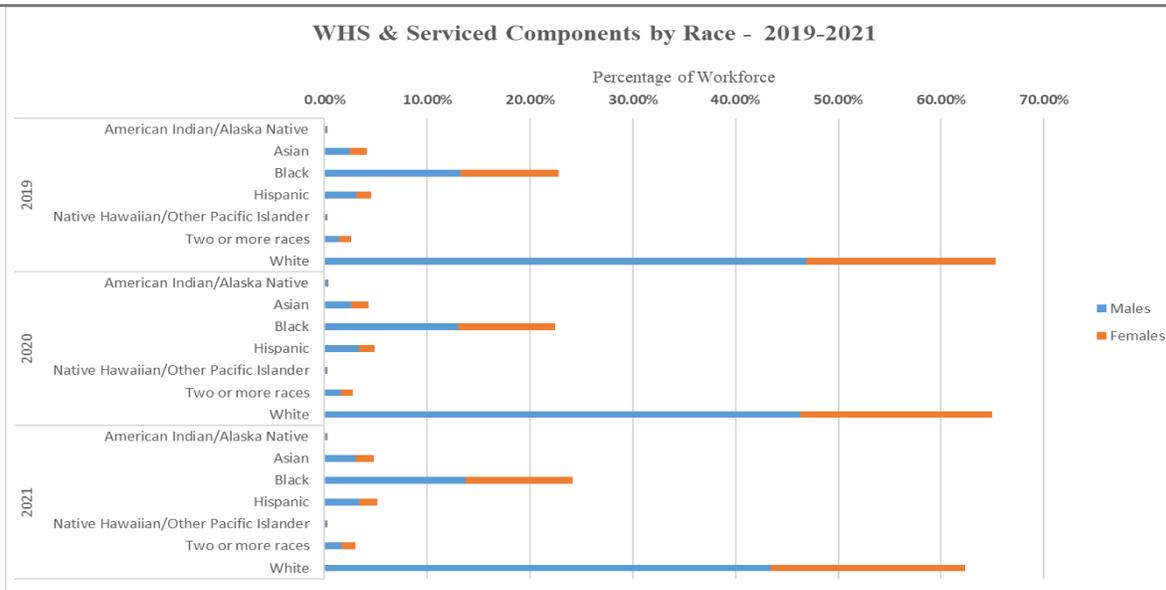


Additionally, Hispanics (males and females) and White females have low participation rates when compared to the appropriate benchmarks (*Table A-1*):

- White females – 18.86% versus CLF of 34.34%
- Hispanic males – 3.38% versus CLF of 5.17%
- Hispanic females – 1.76% versus CLF of 4.79%

Hispanic representation increased from FY 2020, but remains below the CLF; male representation was -1.79% below the CLF; while Hispanic female representation was -3.03% below the CLF for their respective demographics. Representation of White females declined from FY 2020; White male representation exceeds the CLF by 5.13%, while White female representation was less than expected -15.48% below the CLF. In FY 2021, the data reflects a lower representation of Native Hawaiian/Pacific Islander and American Indian/Alaska Native employees when compared to the CLF (*Table A-1*).

¹ 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.



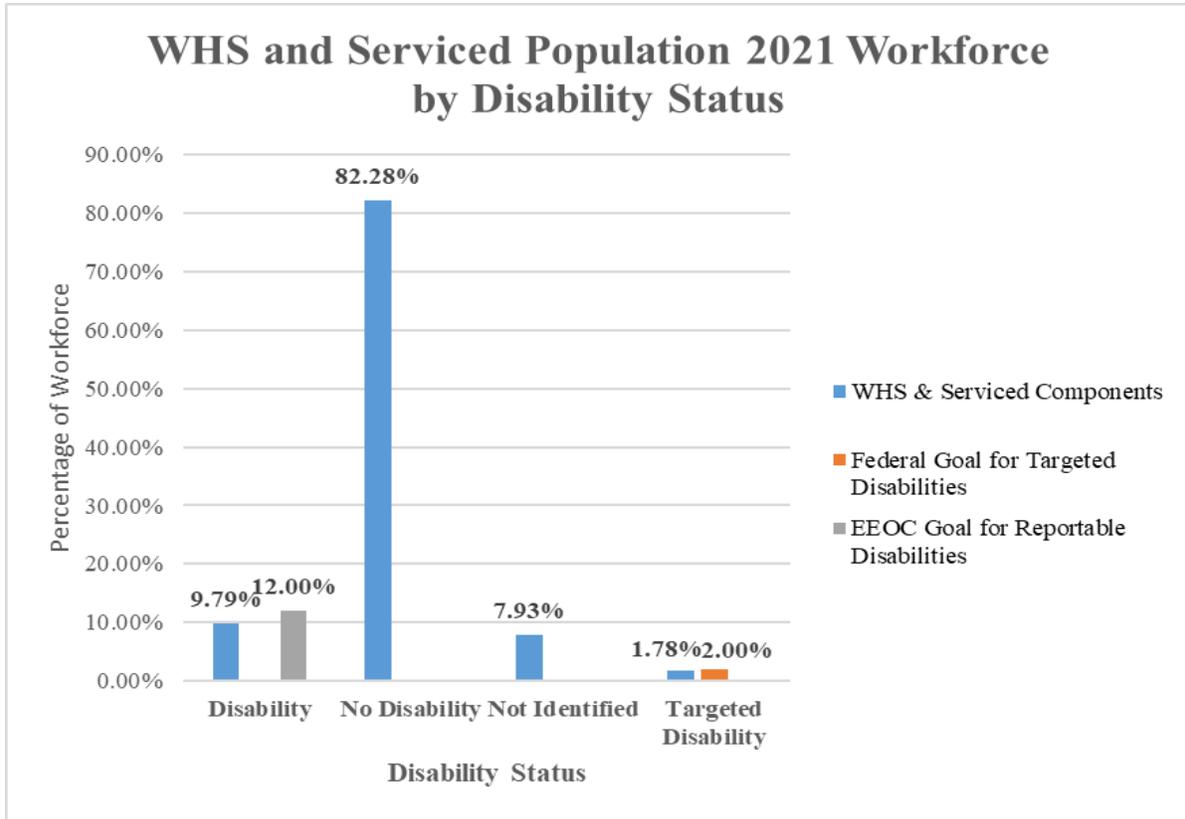
DoD adopted the Federal goal of 12% for hiring PwDs and 2% for hiring PwTDs. In FY 2021, 10 temporary employees (1.52%) reported having a targeted disability; overall, PwDs represented 9.79% and PwTDs represented 1.78% of the workforce compared to PwDs at 9.22% and PwTDs at 1.49% in FY 2020 (*Table B1*).

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

- PwD² – 9.79% versus Federal goal of 12%
- PwTDs³ – 1.78% versus Federal goal of 2%

²A 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.

³PwTDs 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 Sub-Components | Males | Females | Total Workforce |
|---|-------|---------|-------------------|
| Office of the Secretary of Defense (OSD) | 972 | 621 | 1593 |
| Defense Test Resources Management Center (DTRMC) | 18 | 3 | 21 |
| Defense Legal Services Agency (DLSA) | 79 | 61 | 140 |
| Office of Local Defense Community Cooperation (OLDCC) | 19 | 18 | 37 |
| Pentagon Force Protection Agency (PFPA) | 908 | 166 | 1074 |
| U.S. Court of Appeals for the Armed Forces (USCAAF) | 12 | 11 | 23 |
| Defense POW/MIA Accounting Agency (DPAA) | 184 | 109 | 293 |
| Defense Technology Security Administration (DTSA) | 83 | 44 | 127 |
| Washington Headquarters Services (WHS) | 781 | 523 | 1304 ⁴ |

⁴ WHS is no longer servicing Defense Security Cooperation Agency (DSCA). In FY22, we will be servicing the Office of the Chairman of the Joint Chiefs of Staff and the Joint Staff, and reporting demographics for Defense Advanced Research Project Agency and Armed Forces Retirement Home.

Also, the following WHS Serviced Component did not meet, met or exceeded Federal goals:

| WHS Sub-Components | 2% Goal | 12% Goal |
|---|---------|----------|
| Office of the Secretary of Defense (OSD) | 1.82% | 9.48% |
| Defense Test Resources Management Center (DTRMC) | 4.76% | 9.52% |
| Defense Legal Services Agency (DLSA) | 0.71% | 7.86% |
| Office of Local Defense Community Cooperation (OLDCC) formerly known as OEA | -- | 2.70% |
| Pentagon Force Protection Agency (PFPA) | 0.65% | 6.15% |
| U.S. Court of Appeals for the Armed Forces (USCAAF) | -- | -- |
| Defense POW/MIA Accounting Agency (DPAA) | 0.68% | 13.99% |
| Defense Technology Security Administration (DTSA) | 0.79% | 6.30% |
| Washington Headquarters Services (WHS) | 3.30% | 14.19% |

Upward Mobility Analysis: WHS reviewed demographic data to determine whether particular groups are hindered from reaching the highest levels of leadership. In FY 2021, the following groups had a lower representation at the higher pay levels as compared to the pay distribution for the total workforce (*Tables A and B 4*):

- Hispanic males at GS-14, 15, and SES
- Hispanic females GS-15 and SES
- White females at GS-12, 13, and 14
- African American males at GS-14, 15, and SES
- African American females at GS-15, and SES
- PwDs and PwTDs at GS-14, 15, and SES

Major 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 2021, there were 4,612 permanent employees. Of these permanent employees, there were 193 Security Specialists, 683 Police Officers, 214 Foreign Affairs Specialists, 674 Miscellaneous Administration and Programs Specialists, 548 Management and Program Analysts, 176 Contracting Specialists, and 91 Information Technology Specialists.

The participation rate for males in the contracting series was below the occupational Relevant Civilian Labor Force (RCLF) rate, while female representation was below the RCLF for the police, security administration, and information technology management occupations. Hispanics and Blacks males were under-represented in major occupations 1102 and 2210, while representation of Hispanic, Black, and Asian females was below the RCLF in occupations series 0083, 0130, and 2210. White males were under-represented in occupations series 0080, 0343 and 1102 (*Table A6*).

Applicant Flow Data

Internal Competitive Promotions

0080 - Security Administration

In FY 2021, WHS received 831 applications for competitive promotions. Of the 831 individuals, 214 qualified for the promotion – 185 males and 29 females. Of those selected for the promotion, 5 were males and 3 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 | 101 | 39 | 0 |
| White | 237 | 82 | 2 (1 female and 1 male) |
| Black | 240 | 72 | 6 (2 females and 4 males) |
| Asian | 28 | 9 | 0 |
| Native Hawaiian/Other Pacific Islander | 2 | 0 | 0 |
| American Indian/Alaska Native | 11 | 6 | 0 |
| People with Disabilities | 31 | 15 | 1 |
| People with Targeted Disabilities | 18 | 10 | 0 |

0301 - Miscellaneous Administration and Program

In FY 2021, WHS received 1,305 applications for competitive promotions. Of the 1,305 individuals, 380 qualified for the promotion – 256 males and 124 females. Of those selected for the promotion, 8 were males and 5 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 | 105 | 32 | 0 |
| White | 453 | 201 | 7 (2 females and 5 males) |
| Black | 350 | 115 | 6 (3 females and 3 males) |
| Asian | 48 | 15 | 0 |
| Native Hawaiian/Other Pacific Islander | 7 | 4 | 0 |
| American Indian/Alaska Native | 5 | 3 | 0 |
| Two or More Races | 14 | 4 | 0 |
| People with Disabilities | 76 | 33 | 3 |
| People with Targeted Disabilities | 54 | 23 | 1 |

0343 - Management and Program Analysis

In FY 2021, WHS received 603 applications for competitive promotions. Of the 603 individuals, 113 qualified for the promotion – 67 males and 46 females. Of those selected for the promotion, 3 were males and 4 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 | 42 | 8 | 0 |
| White | 139 | 35 | 1 male |
| Black | 214 | 50 | 5 (4 females and 1 male) |
| Asian | 39 | 12 | 0 |
| Native Hawaiian/Other Pacific Islander | 2 | 0 | 0 |
| American Indian/Alaska Native | 4 | 0 | 0 |
| Two or More Races | 14 | 4 | 0 |
| People with Disabilities | 41 | 11 | 0 |
| People with Targeted Disabilities | 18 | 5 | 0 |

1102 - Contracting

In FY 2021, WHS received 384 applications for competitive promotions. Of the 384 individuals, 122 qualified for the promotion – 58 males and 64 females. Of those selected for the promotion, 3 were males and 3 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 | 25 | 11 | 0 |
| White | 120 | 51 | 1 male |
| Black | 111 | 49 | 2 males |
| Asian | 16 | 6 | 0 |
| American Indian/Alaska Native | 1 | 1 | 0 |
| Two or More Races | 6 | 1 | 1 male |
| People with Disabilities | 21 | 11 | 1 |
| People with Targeted Disabilities | 12 | 6 | 3 |

New Hires

WHS and Serviced Components hired 321 permanent and 230 temporary employees in FY 2021. Overall, females were hired for permanent positions (41.43%) at a lower rate than males (58.57%). Whites (61.37%) were hired at almost three times the rate of Black/African Americans (23.68%); Asians were hired at 6.54%. Hispanics, White females, and Asian females were hired at rates slightly lower than the CLF. A total of 14 Hispanics were hired at a rate of 4.36%. There were 30 permanent and 14 temporary PwDs and four permanent and one temporary PwTDs hired in FY 2021 (*See Table A8 & B8*).

The following chart identifies FY 2021 New Hires:

| Permanent Employees | Total | | Hispanic | | White | | Black | | Asian | | AI/AN | | 2 or more | |
|---------------------|-------|------|----------|------|-------|-------|-------|------|-------|------|-------|------|-----------|------|
| | | | M | F | M | F | M | F | M | F | M | F | M | F |
| New Hires | # | 322 | 12 | 8 | 223 | 148 | 52 | 54 | 26 | 12 | 0 | 2 | 9 | 4 |
| | % | 58% | 2% | 1% | 40% | 27% | 9% | 9% | 5% | 2% | 0% | .4% | 2% | .7% |
| Total Workforce | # | 4612 | 159 | 81 | 1966 | 808 | 689 | 510 | 140 | 82 | 11 | 3 | 81 | 66 |
| | % | 100% | 3% | 2% | 43% | 18% | 15% | 11% | 3% | 2% | .2% | .1% | 2% | 1% |
| 2010 CLF | % | 100 | 5.17 | 4.79 | 38.33 | 34.03 | 5.49 | 6.53 | 1.97 | 1.93 | 0.55 | 0.53 | 0.26 | 0.28 |

Employee Recognition and Awards

A review of *Table A13* reflects that both males and females received time-off awards (1-9 hours). Males received 52.46% of the awards and females 47.54%. Hispanic males (1.64%) and females (0.00%), White males (36.07%) and Black males (6.56%) are below the workforce participation rates for time-off awards.

On average, in the category of cash awards \$500 and under, males received higher cash awards than females (\$295 versus \$150). A review of *Table B13* depicts the average cash award for PwDs was commensurate with all employees (\$350); however, the average cash award for PwTDs was lower at \$347. For cash awards of \$2,000 - \$2,999, males received 71% of these awards, with an average of \$2,322, while females received a slightly higher average award of \$2,394. Cash awards of \$2,000 - \$2,999 for PwDs averaged \$2,461 and \$2,309 for PwTDs.

There were 285 Quality Step Increases (QSIs) given in FY 2021 based on the FY 2020 performance cycle. Of those, 64% were males and 36% were females. There were no or very minimal QSI awards given to American Indian or Alaska Native and Native Hawaiian or Other Pacific Islander employees. There were 19 PwDs and four PwTDs who received awards in this category (*See Tables A13 & B13*).

Employee Separations

There were a total of 944 employee separations in FY 2021 (*Tables A14 & B14*). Males separated at 69.70% and Females separated at 30.30% while representing only 35.03% of the workforce. Of the 944 separations, 182 were removals, 328 were resignations, 198 were retirements, and the remaining 236 were other separations. Of the 182 removals, 140 were males and 42 were females. In FY 2021, 76 PwDs and eight PwTDs separated from the Agency.

Agency's Hispanic Workforce Analysis Summary

The following triggers were identified:

- Hispanic males – 3.38% versus CLF of 5.17%
- Hispanic females – 1.76% versus CLF of 4.79%

Hispanic representation has steadily increased during this period but remains below the CLF; for their respective demographics, males are -1.79% below the CLF and females are -3.03% 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?

C.2.a.4 - Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity-alleging harassment?

C.2.a.5 - Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see Complainant v. Department of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Department of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)] If “no”, please provide the percentage of timely processed inquiries in the comments column.

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?

Element E: Efficiency

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

E.4.a.6 - The processing of complaints for the anti-harassment program?

EEOC FORM
715-01
PART F

U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

CERTIFICATION of ESTABLISHMENT of CONTINUING EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS

I, Pamela R. Sullivan, am the Director, Office of Equal, Employment Opportunity Programs (EEOP)

Principal EEO Director/Official For

WHS and WHS serviced components.

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.

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.

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

Pamela R. Sullivan
Director, EEO
(Signature of Principal EEO Director/Official Certifies that this Federal Agency Annual EEOP is in Compliance with EEO MD-715.)

Date

1 April 2022

Regina F. Meiners
Acting Director, WHS
(Signature of Agency Head or Agency Head Designee)

Date

March 30, 2022

| EEOC FORM 715-01 PART E | | U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT | |
|--|---|---|-----------------|
| WASHINGTON HEADQUARTERS SERVICES DOD | | For period covering October 1, 2020 to September 30, 2021 | |
| AGENCY SELF-ASSESSMENT CHECKLIST MEASURING ESSENTIAL ELEMENTS | | | |
| Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP | | | |
| This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace. | | | |
|  Compliance Indicator  Measures | | Measure Met? (Yes/No/NA) | Comments |
| A.1.a | A.1 – The agency issues an effective, up-to-date EEO policy statement. | Y | January 4, 2022 |
| A.1.b New | 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 | |
| A.1.b New | 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 | |
|  Compliance Indicator  Measures | | Measure Met? (Yes/No/NA) | Comments |
| A.2.a | A.2 – The agency has communicated EEO policies and procedures to all employees. | | |
| A.2.a | Does the agency disseminate the following policies and procedures to all employees: | | |
| A.2.a.1 New | Anti-harassment policy? [see MD 715, II(A)] | Y | |
| A.2.a.2 New | Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)] | Y | |
| A.2.b | Does the agency prominently post the following information throughout the workplace and on its public website: | Y | |
| A.2.b.1 New | 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 | |
| A.2.b.2 | Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)] | Y | |
| A.2.b.3 | Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column. | Y | |

| | | | |
|--|---|---------------------------------|--|
| | https://whs.sp.pentagon.mil/HRD/DDR/SitePages/Disability.aspx | | |
| A.2.c | Does the agency inform its employees about the following topics: | | |
| A.2.c.1 | 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 |
| A.2.c.2 New | ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often. | Y | During EEO Monthly Training |
| A.2.c.3 New | Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often. | Y | During EEO Monthly Training |
| A.2.c.4 New | 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 | |
| A.2.c.5 | 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 | |
|  Compliance Indicator  Measures | A.3 – The agency assesses and ensures EEO principles are part of its culture. | Measure Met? (Yes/No/NA) | Comments |
| A.3.a New | 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 | HRD is an active participant supporting OSD (PR)/DOD Civilian EEO Award program. |
| A.3.b New | 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 | |
| Essential Element B: INTEGRATION OF EEO INTO THE AGENCY’S STRATEGIC MISSION | | | |
| This element requires that the agency’s EEO programs are structured to maintain a workplace that is free from discrimination and support the agency’s strategic mission. | | | |
|  Compliance Indicator  Measures | B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program. | Measure Met? (Yes/No/NA) | Comments |
| B.1.a | Is the agency head the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)] | Y | |
| B.1.a.1 New | If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If “yes,” please provide the title of the agency head designee in the comments. | N/A | |
| B.1.a.2 | Does the agency’s organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)] | Y | |
| B.1.b | Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency’s EEO program? [see 29 CFR §1614.102(c)(1); MD-715 | Y | |

| | | | |
|--|--|---------------------------------|-----------------|
| | Instructions, Sec. I] | | |
| B.1.c | During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comments column. | Y | |
| B.1.d New | 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 | |
|  Compliance Indicator  Measures | B.2 – The EEO Director controls all aspects of the EEO program. | Measure Met? (Yes/No/NA) | Comments |
| B.2.a | Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)] | Y | |
| B.2.b New | Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)] | Y | |
| B.2.c New | 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.2.d New | 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.2.e | Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502] | Y | |
| B.2.f New | 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.2.g New | 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 | |
|  Compliance Indicator  Measures | B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions. | Measure Met? (Yes/No/NA) | Comments |
| B.3.a | Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)] | Y | |
| B.3.b | Does the agency's current strategic plan reference EEO / diversity | Y | |

| | | | |
|--|--|---------------------------------|-----------------|
| New | and inclusion principles? [see MD-715, II(B)] If “yes”, please identify the EEO principles in the strategic plan in the comments column. | | |
|  Compliance Indicator  Measures | B.4 - The agency has sufficient budget and staffing to support the success of its EEO program. | Measure Met? (Yes/No/NA) | Comments |
| B.4.a | Pursuant to 29 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.4.a.1 | to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)] | Y | |
| B.4.a.2 | to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)] | Y | |
| B.4.a.3 | to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)] | Y | |
| B.4.a.4 | to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column. | Y | |
| B.4.a.5 | to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)] | Y | |
| B.4.a.6 | to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)] | Y | |
| B.4.a.7 New | 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 | |
| B.4.a.8 | to effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709] | Y | |
| B.4.a.9 New | 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.4.a.10 | to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)] | Y | |
| B.4.a.11 New | to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)] | Y | |

| | | | |
|--|---|-------------------------------------|-----------------|
| B.4.b New | 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.4.c | Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)] | Y | |
| B.4.d | Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110? | Y | |
| B.4.e | Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110? | Y | |
|  Compliance Indicator  Measures | B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills. | Measure Met? (Yes/No/NA) | Comments |
| B.5.a | Pursuant to 29 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.5.a.1 New | EEO Complaint Process? [see MD-715(II)(B)] | Y | |
| B.5.a.2 | Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)] | Y | |
| B.5.a.3 New | Anti-Harassment Policy? [see MD-715(II)(B)] | Y | |
| B.5.a.4 New | 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.5.a.5 | ADR, with emphasis on the federal government’s interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)] | Y | |
|  Compliance Indicator  Measures | B.6 – The agency involves managers in the implementation of its EEO program. | Measure Met? (Yes/No/NA) | Comments |
| B.6.a New | Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I] | N | PART H-1 |
| B.6.b | Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I] | N | PART H-1 |
| B.6.c | When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I] | Y | |
| B.6.d | 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 | |

Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY

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

|  Compliance Indicator  Measures | C.1 – The agency conducts regular internal audits of its component and field offices. | Measure Met? (Yes/No/NA) | Comments |
|---|---|---------------------------------|-----------------|
| C.1.a New | 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 | |
| C.1.b New | 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 conducting audits in the comments section. | N/A | |
| C.1.c New | 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 | |
|  Compliance Indicator  Measures | C.2 – The agency has established procedures to prevent all forms of EEO discrimination. | Measure Met? (Yes/No/NA) | Comments |
| C.2.a New | 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 | |
| C.2.a.1 New | 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 | PART H-2 |
| C.2.a.2 New | 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 | |
| C.2.a.3 New | 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 | |
| C.2.a.4 New | 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.] | N | PART H-2 |
| C.2.a.5 New | 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</u> | N | PART H-2 |

| | | | |
|--|---|---------------------------------|--|
| | v. Department of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Department of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)] If “no”, please provide the percentage of timely-processed inquiries in the comments column. | | |
| C.2.a.6 New | 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 | |
| C.2.b New | Has the agency established disability reasonable accommodation procedures that comply with EEOC’s regulations and guidance? [see 29 CFR 1614.203(d)(3)] | Y | |
| C.2.b.1 | Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)] | Y | |
| C.2.b.2 New | Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)] | Y | |
| C.2.b.3 New | 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 | |
| C.2.b.4 New | 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 | |
| C.2.b.5 | Does the agency process all accommodation requests within the timeframe set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely processed requests in the comments column. | Y | |
| C.2.c New | 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 | |
| C.2.c.1 New | 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. | N | The RA Form (AI114) is currently in revision to include PAS policy. The issuance will be posted to the public website upon completion. |
|  Compliance Indicator  Measures | C.3 – The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity. | Measure Met? (Yes/No/NA) | Comments |
| C.3.a New | 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 | Y | |

| | | | |
|--|---|---------------------------------|-----------------|
| | principles and their participation in the EEO program? | | |
| C.3.b | Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities: | | |
| C.3.b.1 | Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I] | Y | |
| C.3.b.2 | 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 | |
| C.3.b.3 | Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)] | Y | |
| C.3.b.4 | Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I] | Y | |
| C.3.b.5 | Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)] | Y | |
| C.3.b.6 | Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)] | Y | |
| C.3.b.7 New | Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)] | Y | |
| C.3.b.8 | Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2] | Y | |
| C.3.b.9 New | 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 | |
| C.3.c New | 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 | |
| C.3.d New | 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 | |
|  Compliance Indicator  Measures | C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program. | Measure Met? (Yes/No/NA) | Comments |
| C.4.a New | 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 | |
| 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 | N | PART H-3 |

| | | | |
|--|---|-------------------------------------|-----------------|
| | participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I] | | |
| C.4.c New | 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 | |
| C.4.d New | 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 | |
| C.4.e | Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to: | | |
| C.4.e.1 New | Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)] | Y | |
| C.4.e.2 New | Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)] | Y | |
| C.4.e.3 New | Develop and/or provide training for managers and employees? [see MD-715, II(C)] | Y | |
| C.4.e.4 New | Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)] | Y | |
| C.4.e.5 New | Assist in preparing the MD-715 report? [see MD-715, II(C)] | Y | |
|  Compliance Indicator  Measures | C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action. | Measure Met? (Yes/No/NA) | Comments |
| C.5.a | Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 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 New | 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 | |
|  Compliance Indicator  Measures | C.6 – The EEO office advises managers/supervisors on EEO matters. | Measure Met? (Yes/No/NA) | Comments |
| C.6.a | Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If “yes”, please | Y | |

| | | | |
|--|---|---------------------------------|--|
| | identify the frequency of the EEO updates in the comments column. | | |
| C.6.b New | Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I] | Y | |
| Essential Element D: PROACTIVE PREVENTION | | | |
| This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity. | | | |
|  Compliance Indicator  Measures | D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year. | Measure Met? (Yes/No/NA) | Comments |
| D.1.a New | Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I] | Y | |
| D.1.b New | Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] | Y | Focus Groups will be reestablished to maintain this deficiency in FY 2022. |
| D.1.c New | 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 | |
|  Compliance Indicator  Measures | D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.) | Measure Met? (Yes/No/NA) | Comments |
| D.2.a New | Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)] | Y | |
| D.2.b | Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)] | Y | |
| D.2.c | Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)] | Y | |
| D.2.d New | 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 | |

|  Compliance Indicator  Measures | D.3 – The agency establishes appropriate action plans to remove identified barriers. | Measure Met? (Yes/No/NA) | Comments |
|--|--|---------------------------------|---|
| D.3.a. New | Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)] | Y | |
| D.3.b. New | 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 | |
| D.3.c. New | Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)] | Y | |
|  Compliance Indicator  Measures | D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities. | Measure Met? (Yes/No/NA) | Comments |
| D.4.a. New | 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. | N | Will update the AAP and post on the public website in FY 2022. |
| D.4.b. New | 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 | |
| D.4.c. New | 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 | |
| D.4.d. New | 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. |
| Essential Element E: EFFICIENCY This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency’s EEO programs and an efficient and fair dispute resolution process. | | | |
|  Compliance Indicator  Measures | E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process. | Measure Met? (Yes/No/NA) | Comments |
| E.1.a. | Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105? | Y | |
| E.1.b. | Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)? | Y | |
| E.1.c. New | Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)? | Y | |
| E.1.d. New | Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written | Y | |

| | | | |
|--|---|---------------------------------|--|
| | EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments. | | |
| E.1.e New | 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 | |
| E.1.f | Does the agency timely complete investigations, pursuant to 29 CFR §1614.108? | N | Part H-4 |
| E.1.g New | 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 | |
| E.1.h | 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 | |
| E.1.i | Does the agency timely issue final actions following receipt of the hearing file and the administrative judge’s decision, pursuant to 29 CFR §1614.110(a)? | Y | |
| E.1.j | If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If “yes”, please describe how in the comments column. | N/A | |
| E.1.k New | 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 | |
| E.1.l New | 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 | |
|  Compliance Indicator  Measures | E.2 – The agency has a neutral EEO process. | Measure Met? (Yes/No/NA) | Comments |
| E.2.a New | Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)] | Y | |
| E.2.b | When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If “yes”, please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column. | Y | Ms. Jenifer Schall, Chief of Labor and Employment Law. |
| E.2.c New | 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 | |
| E.2.d | Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)] | Y | |

| | | | |
|--|--|---------------------------------|-----------------|
| E.2.e | If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)] | Y | |
|  Compliance Indicator  Measures | E.3 – The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program. | Measure Met? (Yes/No/NA) | Comments |
| E.3.a | Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 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 New | 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 New | Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)] | Y | |
|  Compliance Indicator  Measures | E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program. | Measure Met? (Yes/No/NA) | Comments |
| E.4.a | Does the agency have systems in place to accurately collect, monitor, and analyze the following data: | | |
| E.4.a.1 | Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)] | 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 New | 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 New | 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] | N | Part H-2 |

|  Compliance Indicator  Measures | E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program. | Measure Met? (Yes/No/NA) | Comments |
|--|--|---------------------------------|---|
| E.5.a | Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments. | Y | |
| E.5.b | Does the agency review other agencies’ best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If “yes”, provide an example in the comments. | Y | Department of Veterans Affairs, method of annotating acceptance of HWE incidents and then specifying accepted discrete. |
| E.5.c | Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)] | Y | |
| Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions. | | | |
|  Compliance Indicator  Measures | F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements. | Measure Met? (Yes/No/NA) | Comments |
| F.1.a | Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)] | Y | |
| F.1.b | Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)] | Y | |
| F.1.c | Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)] | Y | |
| F.1.d | Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)] | Y | |
| F.1.e | When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)] | Y | |
|  Compliance Indicator  Measures | F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions. | Measure Met? (Yes/No/NA) | Comments |
| F.2.a | Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)] | Y | |
| F.2.a.1 | When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)] | Y | |

| | | | |
|--|--|---------------------------------|-----------------|
| F.2.a.2 | When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501] | Y | |
| F.2.a.3 New | 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 | |
| F.2.a.4 | Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance? | Y | |
|  Compliance Indicator  Measures | F.3 – The agency reports to EEOC its program efforts and accomplishments. | Measure Met? (Yes/No/NA) | Comments |
| F.3.a New | 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 | |
| F.3.b New | 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.6.a | Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I] |
| B.6.b | Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I] |

Objective(s) and Dates for EEO Plan

| Date Initiated | Objective | Target Date | Modified Date | Date Completed |
|----------------|--|-------------|---------------|----------------|
| 09/30/2021 | Ensure senior managers are involved in the implementation and attendance of Special Emphasis Programs. | 09/30/2021 | | |
| 11/01/2021 | Establish Champions for Special Emphasis to actively engage in the barrier analysis process. | 06/30/2021 | | |

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

| Target Date | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date | Completion Date |
|-------------|---|---|---------------|-----------------|
| 01/15/2022 | Invite Senior leaders to participate in Special Emphasis Programs. | YES | | |
| 03/15/2022 | Conduct introductory workshops with key barrier analysis partners (Senior leader Champions and HR). | YES | | |
| 05/15/2022 | Conduct data analysis; identify triggers and | YES | | |

| Target Date | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date | Completion Date |
|-------------|--|---|---------------|-----------------|
| | possible barriers utilizing the EEOC root cause analysis/decision tree approach. | | | |

Report of Accomplishments

| Fiscal Year | Accomplishments |
|-------------|--|
| FY 2021 | EEOP developed a spreadsheet, which identifies various triggers within WHS permanent and disability workforce to include triggers for new hires, separations, mission critical occupations and awards. |

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] |
| C.2.a.4 | Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity-alleging harassment? [see Enforcement Guidance, V.C.] |
| C.2.a.5 | Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <u>Complainant v. Department of Veterans Affairs</u> , EEOC Appeal No. 0120123232 (May 21, 2015); <u>Complainant v. Department of Defense (Defense Commissary Agency)</u> , EEOC Appeal No. 0120130331 (May 29, 2015)] If “no”, please provide the percentage of timely processed inquiries in the comments column. |
| 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] |

Objective(s) and Dates for EEO Plan

| Date Initiated | Objective | Target Date | Modified Date | Date Completed |
|----------------|---|-------------|---------------|----------------|
| 10/01/2021 | Create an effective Anti-Harassment 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 Nalli | NO |
| Director, Office of Equal Employment Opportunity Program | Pamela Sullivan | NO |

Planned Activities toward Completion of Objective

| Target Date | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date | Completion Date |
|-------------|---|---|---------------|-----------------|
| 10/01/2021 | Develop a toolkit to explain the Anti- Harassment process to supervisors and employees. | YES | | |
| 12/02/2021 | Ensure all inquiries for allegation of harassment are addressed within 10 days of notification and track harassment inquiries and investigations. | YES | | |
| 03/01/2022 | Establish an effective Anti-Harassment process/ procedures and ensure there is a protection against retaliation. | YES | | |
| 05/01/2022 | Provide Anti-Harassment training to managers, supervisors and WHS employees. | YES | | |

Report of Accomplishments

| Fiscal Year | Accomplishments |
|-------------|---|
| FY 2021 | EEOP currently provides Anti-Harassment Training in our mandatory bi-annual EEO and Diversity training. |

MD-715 – Part H - 3

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

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

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

Statement of Model Program Essential Element Deficiency

| Type of Program Deficiency | Brief Description of Program Deficiency |
|----------------------------|--|
| 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. | 01/15/2024 | | |

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

| Target Date | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date | Completion Date |
|-------------|--------------------|--|---------------|-----------------|
| | | | | |

| Target Date | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date | Completion Date |
|--------------------|---|---|----------------------|------------------------|
| 11/01/2021 | Working with HRD, determine all WHS policies and procedures that are related to merit promotion, employee recognition, employee development/training programs. | YES | | |
| 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 | | |
| 03/30/2022 | Work with HRD to understand the number of management/personnel policies, procedures, and practices that currently exist. | YES | | |
| 06/30/2022 | Work with HRD, formulate a timeline with milestones and schedule for a review of all WHS management/personnel policies. | YES | | |

Report of Accomplishments

| Fiscal Year | Accomplishments |
|--------------------|--|
| FY 2021 | This is a new H plan; therefore, WHS has no accomplishments to report. |

MD-715 – Part H - 4

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

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

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

Statement of Model Program Essential Element Deficiency

| Type of Program Deficiency | Brief Description of Program Deficiency |
|----------------------------|---|
| 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 | | |

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

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

Report of Accomplishments

| Fiscal Year | Accomplishments |
|-------------|--|
| FY 2021 | This is a new H plan; therefore, WHS has no accomplishments to report. |

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>Total Workforce: WHS permanent workforce data (Table A1) reflects a low participation rate for females (34.34%) compared to the CLF of (48.10%). Specifically, Hispanic females (1.76%), White Females (18.86%), and Asian females (1.80%) are below their respective CLFs.</p> <p>New Hires: The Agency hired 551 new employees, 229 of whom 229 (41.56%) were females, which falls below the CLF of 48.16%.</p> <p>Separation: Nine hundred and forty-four (944) employees separated the Agency in FY 2021. Two Hundred and eighty-six (30.30%) females separated which was below the total workforce of 35.10% and below the CLF of 48.16% of the overall WHS workforce.</p> |
| Female Workforce GS-14 thru SES | Tables A4 | <p>In comparison to the permanent workforce, female participation rate was 34.95%. The following are areas of concern:</p> <p>The GS-15 female participation rate was 309 (32.59%). In FY 2021, the participation rate for Hispanic females was 1.05% compared to the permanent workforce of 1.76%, Black Females were 5.27% compared to the permanent workforce of 11.06%.</p> <p>The SES Hispanic Female population was 3 (1.27%), compared to the permanent workforce rate of 1.76%. The SES Black female population was 5 (2.11%), compared to the permanent workforce of 11.06%.</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 |

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

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 will need to determine why females have a low participation rate in WHS's total workforce. Additionally, WHS will need to determine why females separated the Agency at 30.30% |

Objective(s) and Dates for EEO Plan

| Objective | Date Initiated | Target Date | Sufficient Funding & Staffing? (Yes or No) | Modified Date | Date Completed |
|--|-----------------------|--------------------|---|----------------------|-----------------------|
| Collaborate with HRD's Recruitment Team on events and efforts for Females. | 10/01/2021 | 10/01/2022 | | | |
| Develop a Recruitment and Outreach Plan identifying undergraduate, graduate schools and universities, summer internships and associations for Women. | 10/01/2021 | 10/01/2022 | | | |
| Examine the Applicant Flow Data to determine whether Women are applying and/or being selected. | 10/01/2021 | 10/12/2022 | | | |

Responsible Official(s)

| Title | Name | Performance Standards Address the Plan? (Yes or No) |
|--|-----------------|--|
| Director, Equal Employment Opportunity Program | Pamela Sullivan | NO |
| Chief Human Resources Officer/HRD | Christine Nalli | NO |

Planned Activities Toward Completion of Objective

| Target Date | Planned Activities | Modified Date | Completion Date |
|--------------------|--|----------------------|------------------------|
| 01/15/2022 | Collaborate with HRD's Recruitment Team on events and efforts for Females. | | |
| 03/13/2022 | Develop a Recruitment and Outreach Plan identifying undergraduate, graduate schools and universities, summer internships and associations for Women. | | |
| 05/15/2022 | Participate in HRD's Strategic Recruitment discussion and provide input. | | |
| 07/30/2022 | Examine exit survey data to determine why females are leaving the Agency. | | |

| Target Date | Planned Activities | Modified Date | Completion Date |
|-------------|--|---------------|-----------------|
| 09/01/2022 | Develop partnerships with colleges, universities that have a high percentage of women with mission critical skillsets. | | |
| 11/02/2022 | Examine the Applicant Flow Data to determine whether Women are applying and/or being selected. | | |

Report of Accomplishments

| Fiscal Year | Accomplishments |
|----------------|--|
| FY 2021 | This is a new Part I; therefore, WHS has no accomplishments to report. |

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 2021 for males was 178 (3.38%), which was below the CLF of 5.17%; for Hispanic Females, the rate was 93 (1.76%), which was below the CLF of 4.79%.</p> <p>New Hires: The Agency hired 551 employees, of whom 12 (2.18%) were Hispanic males below the CLF of 5.17% and 8 (1.45%) were Hispanic females below the CLF of 4.79%.</p> <p>Separation: Thirty-nine Hispanics separated from WHS in FY 2021. Hispanic males separation was at 26 (2.75%) which was below the CLF of 5.17%. Of the 286 females who separated the Agency, 13 (1.38%) were Hispanic, which was below the CLF of 4.79%. Both males and females are below the respective CLF.</p> |
| Senior Executive Service | Table A4 | <p>The participation rate Hispanic males in the Senior Executive Service (SES) was 9 (3.80%), and Hispanic females 3 (1.27%); males exceeded the compared permanent workforce of 4.45%, while females were below the permanent workforce rate of 2.14%. The analysis reveals 91 (13.67%) of the 135 Hispanic employees were at the GS-13–GS-15 pay grades, placing them in the SES pipeline.</p> |
| Major Occupation | Table A6 | <p>Hispanic males are well below the CLF of all major occupations except for 0080 (Security), and 0083 (Police Officers). Hispanic females are below major occupations except for 0301 (Misc. Administration), and 1101 (Contracting).</p> |

EEO Group(s) Affected by Trigger

| EEO Group |
|----------------------------|
| Hispanic or Latino Males |
| Hispanic or Latino Females |

Barrier Analysis Process

| Sources of Data | Source Reviewed? (Yes or No) | Identify Information Collected |
|---|-------------------------------------|---------------------------------------|
| Workforce Data Tables | YES | Examined the FY 2021 workforce data |
| Complaint Data (Trends) | YES | |
| Grievance Data (Trends) | NO | |
| Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes) | NO | |
| Climate Assessment Survey (e.g., FEVS) | NO | |
| Exit Interview Data | NO | |
| Focus Groups | NO | |
| Interviews | NO | |
| Reports (e.g., Congress, EEOC, MSPB, GAO, OPM) | NO | |
| Other (Please Describe) | N/A | |

Status of Barrier Analysis Process

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

Statement of Identified Barrier(s)

| Description of Policy, Procedure, or Practice |
|---|
| The Agency continued to work on the low participation rates of Hispanics. In FY 2021, 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

| Objective | Date Initiated | Target Date | Sufficient Funding & Staffing? (Yes or No) | Modified Date | Date Completed |
|--|-----------------------|--------------------|---|----------------------|-----------------------|
| Identify and address potential barriers within the Hispanic workforce. | 01/01/2022 | 01/01/2023 | | | |
| Develop an outreach/recruitment plan to identify strategies to improve for Hispanic representation. | 05/01/2022 | 05/01/2023 | | | |
| Utilize DefenseReady as a mechanism to track information on Agency vacancies, to include recruitment as available. | 07/01/2022 | 07/01/2023 | | | |
| Analyze separation data to evaluate and explore the correlation between length of service and separation. | 10/01/2022 | 10/01/2023 | | | |

Responsible Official(s)

| Title | Name | Performance Standards Address the Plan? (Yes or No) |
|--|-----------------|--|
| Director, Equal Employment Opportunity Program | Pamela Sullivan | NO |
| Chief Human Resources Officer/HRD | Christine Nalli | NO |

Planned Activities Toward Completion of Objective

| Target Date | Planned Activities | Modified Date | Completion Date |
|--------------------|---|----------------------|------------------------|
| 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

| Fiscal Year | Accomplishments |
|---|---|
| <p style="text-align: center;">FY 2021</p> | <p>This is a new Part I; therefore, WHS has no accomplishments to report.</p> |

MD-715 – Part J

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

To capture agencies’ affirmative action plan for 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 15.64% in FY 2021, 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 0 No X
 - b. Cluster GS-11 to SES (PwTD) Yes 0 No X

N/A

| Grade Level Cluster (GS or Alternate Pay Plan B) | Total | | Reportable Disability | | Targeted Disability | |
|--|-------|-----|-----------------------|----|---------------------|---|
| | # | # | % | # | % | % |
| Numerical Goal | | | 12% | | 2% | |
| Grades GS-1 to GS 10 | 211 | 33 | 15.64 | 7 | 3.32 | |
| Grades GS-11 to SES | 2839 | 332 | 11.69 | 67 | 2.36 | |

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

WHS utilized a variety of methods to include Training (HR & Leadership for New Supervisors; annual EEO and Diversity Training); quarterly newsletter, quarterly Leadership meetings, Workforce Recruitment Program (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 & 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 | ST Pettiford, HR Specialist Disability Recruitment |
| Answering questions from the public about hiring authorities that take disability into account | 3 | 0 | 3 | ST Pettiford, HR Specialist Disability Recruitment |
| Processing reasonable accommodation requests from applicants and employees | 2 | 0 | 2 | Edna E Johnson Ph.D. Disability & Reasonable Accommodation Program Manager Edna.e.johnson.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 | ST Pettiford, HR Specialist Disability Recruitment |

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.

In FY 2021, the Agency hired 54 employees who reported having a disability and 6 employees who reported having a targeted disability. PwTD comprise 1.78% of the workforce of WHS and Served Components. Employees with reportable disabilities are now 9.79% of the total workforce, compared to 9.22% at the end of FY 2020. WHS continues to work closely with Gallaudet University and 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. 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, to include veterans with a disability rating of 30% or more, with links to informative webpages that further explain and clarify those appointment types. Continue 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 Special Employment Program (SEP) employees, who verify eligibility before adding applicants to the WHS database. Efforts to improve 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 & Leadership for New Supervisors; annual EEO and Diversity Training); quarterly newsletter, a 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.

Special Employment Program employees maintain current relationships virtually with vocational rehabilitation offices, state employment offices, veterans’ organizations, colleges/universities and other facilities to obtain applications from disabled veterans. They participate in a DoD department-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 2021, the WHS hired 54 employees (9.42%) who reported having a disability and 6 employees (1.05%) who reported having a targeted disability. PwTD comprise 1.78% of the workforce of WHS and Serviced Components. Employees with reportable disabilities are now 9.79% of the total workforce, compared to 9.22% of total workforce at the end of FY 2020. This falls below the respective benchmark of 12% for PwD and 2% for PwTD.

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 PwD in the following most populous MCO’s: Series 0083 – 1 applicant, 0 qualified, 0 selected. Series 0301 – 38 total applicants and 35 total qualified applicants, 0 selected. Among the new hires with disabilities who voluntarily identified their disability, triggers existed for PwTD in the following most populous MCO’s: Series 0083 – 1 applicant, 0 qualified, 0 selected and series 0301 – 59 applicants, 25 qualified, 1 selected. While the number of PwD and PwTD applicants is low, the data is provided to show a trend in non-selection, and in some cases, a disparity in those who applied versus those who qualified among PwD.

| New Hires to Mission – Critical Occupations | Total | Reportable Disability | | Targeted Disability | |
|---|-------|--------------------------|--------------|--------------------------|--------------|
| | | Qualified Applicants (#) | New Hire (#) | Qualified Applicants (%) | New Hire (%) |
| Numerical Goal | | 12% | | 2% | |
| 0080 Security Administration | 1,072 | 412 | 11 | 0 | 0 |
| 0083 Police Officers | 911 | 364 | 25 | 0 | 0 |
| 0130 Foreign Affairs | 9 | 0 | 0 | 0 | 0 |
| 0301 Miscellaneous Administration & Program | 2,323 | 35 | 0 | 0 | 0 |
| 0343 Management and Program Analysis | 652 | 169 | 7 | 0 | 0 |
| 2210 Information Technology Management | 19 | 0 | 14 | 0 | 0 |

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 series 0301 MCO – 6.00% of applicants and 6.00% of qualified applicants and 13.00% of selected applicants. Series 0083 MCO – 1.00% of applicants and 0.00% 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 series 0301 MCO – 3.00% of applicants and 21.0% of qualified applicants and 4.00% of selected applicants. Series 0083 MCO – 1.00% of applicants and 0.00% 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 |

Among the qualified employees with disabilities who voluntarily identified their disability, triggers existed for PwTD and PwD promoted in the following most populous MCOs: PwD: series 0301 – 6.00% qualified, 13.00% selected and series 0083 – 1.00% qualified, 0.00% selected. PwTD in the series 0301 MCO 21.0% of qualified applicants and 4.00% of selected and series 0083 – 1.00% qualified, 0.00% selected. While some of the percentages may not represent significant differences, the information is provided to show a trend for non-selection.

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 employees endeavor to place PwD and PwTD employees in a billet that has promotion potential, when possible. Managers are encouraged to provide PwD and PwTD employees training for promotion to the next highest grade. HRD works with the Section 508 coordinator to insure that PwD and Pw TD employees are provided appropriate accessible technology to enable them to perform the essential functions of their jobs, as well as participate in training and development opportunities.

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 |

Applicant Flow data is not available at this time.

C. AWARDS

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

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

Using the inclusion rate, 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 PwTD’s 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 PwTD’s is lower than the average award amount for all recipients. Cash awards between \$4,000 and \$4,999: The average award amount PwTD’s is lower than the average award amount for all recipients. Cash awards greater than \$5,000: The average award amount for PwDs and PwTD’s 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 |

Using the inclusion rate, triggers were identified for the following awards: Quality Step Increases. The average award amount for PwDs and PwTDs is lower than the average award amount for all recipients. Using the inclusion rate, triggers were identified for the following awards: Performance Based Pay Increases: The average award amount for PwDs and is 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 |

Applicant Flow 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 | |

N/A

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

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

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

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

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

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 |

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 |

Section V: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Yes X No 0 N/A 0

N/A

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 |

N/A

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 |

N/A

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 majority of separations comprised of employees who voluntarily left the WHS to work for another Federal agency or who retired. At this time, EEO does not have access to 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 fiscal year, 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 time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

The average processing time and implementation of accommodation requests in FY 2021 was 20 days which included receipt and review of medical documentation. The process had to adapt to some 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 was moved under the management of the Labor Management & Employee Relations (LMER) Division. However, the RAPM, the Assistant Director, LMER and the ER team members are fully available to advise managers before, during and following the RA process to ensure the effectiveness of an accommodation.

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

WHS timely processes RA requests and timely approves 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 & 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 finished drafting a PAS policy as part of the AI 114 Reasonable Accommodation 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 fiscal year, 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 fiscal year, 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 fiscal year, please describe the corrective measures taken by the agency.

In FY 2021, there were no findings of discrimination.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

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 2021, there were no findings of discrimination.

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.

| | |
|------------------|---|
| Trigger 1 | <p>Promotion of PwD and PwTD into Managerial Positions</p> <p>Table B3: Occupational Categories by Disability</p> <p>Trigger(s): Executive/Senior Level is below the Federal benchmark of 12% for PwD (7/4.07%).</p> <p>Trigger(s): Executive/Senior Level is below the Federal benchmark of 12% for PwTD (0/0.00%).</p> <p>Trigger(s): Out of eight occupational categories, four are below the Federal benchmark of 12% for PwD.</p> <p>Professionals (8.91%), Technicians (10.96%), Craft Workers (5.52%), Service Workers (2.88%).</p> <p>Out of the eight occupational categories, five are below the Federal benchmark of 2% for PwTD.</p> <p>Professionals (1.51%), Technicians (1.37%), Craft Workers (0.61%), Operatives (7.41%) Service Workers (0.13%).</p> <p>Table B4: General Schedule (GS) Grades by Disability</p> <p>Trigger(s): GS-14 cluster (53 employees) is below the PwD benchmark of 12% at</p> |
|------------------|---|

| | | |
|---|---|---|
| | <p>10.41%.</p> <p>Trigger(s): GS-15 cluster (86 employees) is below the PwD benchmark of 12% at 9.07%.</p> <p>Trigger(s): SES cluster (10 employees) is below the PwD benchmark of 12% at 4.22%.</p> <p>Trigger(s): GS-14 cluster (7 employees) is below the PwTD benchmark of 2% at 1.38%.</p> <p>Trigger(s): SES cluster (0 employees) is below the PwTD benchmark of 2% at 0.00%.</p> <p>Table B6: Mission-Critical Occupations by Disability</p> <p>Trigger(s): PwD is below the Federal benchmark of 12% in 0083, 0130 and 1102 series.</p> <p>Trigger(s): PwTD is below the Federal benchmark of 2% in 0083, 0130, 0301 and 1102 series.</p> | |
| Barrier(s) | None | |
| Objective(s) | Enhance Employee Development within HRD and to work with WHS EEOP, Enhance Special Employment Programs in Workforce Recruitment and Retention by working with Equal Employment Programs | |
| Responsible Official(s) | | Performance Standards Address the Plan? (Yes or No) |
| Erika Deas-Johnson, Supervisor Special Employment Programs Branch, HRD | | No |
| Barrier Analysis Process Completed? (Yes or No) | | Barrier(s) Identified? (Yes or No) |
| No | | No |
| Sources of Data | Sources Reviewed? (Yes or No) | Identify Information Collected |
| Workforce Data Tables | YES | Table B3: Occupational Categories by Disability; Table B4: General Schedule (GS) Grades by Disability, Table B6: Mission Critical Occupations by Disability |
| Complaint Data (Trends) | NO | |
| Grievance Data (Trends) | NO | |
| Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes) | NO | |
| Climate Assessment Survey (e.g., FEVS) | NO | |

| Exit Interview Data | NO | | | |
|--|--|---|----------------------------|------------------------------|
| Focus Groups | NO | | | |
| Interviews | NO | | | |
| Reports (e.g., Congress, EEOC, MSPB, GAO, OPM) | NO | | | |
| Other (Please Describe) | | | | |
| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Staffing & Funding (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
| Fiscal Year | Accomplishments | | | |
| 2021 | No accomplishments at this time | | | |
| Trigger 2 | <p>Permanent Workforce by Component</p> <p>Table B2: Permanent Workforce by Component</p> <p>Trigger(s): Office of the Secretary of Defense (OSD) (1,593 employees) is below the PwD benchmark of 12% at 9.48%.</p> <p>Trigger(s): Defense Legal Services Agency (DLSA) (140 employees) is below the PwD benchmark of 12% at 7.86%.</p> <p>Trigger(s): Defense Test Resources Management Center (DTRMC) (21 employees) is below the PwD benchmark of 12% at 9.52%.</p> <p>Trigger(s): Office of Economic Adjustment (OEA)/Office of Local Defense Community Cooperation (OLDCC) (37 employees) is below the PwD benchmark of 12% at 2.70%.</p> <p>Trigger(s): Pentagon Force Protection Agency (PFPA) (1074 employees) is below the PwD benchmark of 12% at 6.15%.</p> <p>Trigger(s): U.S. Court of Appeals for the Armed Forces (USCAAF) (23 employees) is below the PwD benchmark of 12% at 0.00%.</p> <p>Trigger(s): Defense Technology Security Administration (DTSA) (127 employees) is below the PwD benchmark of 12% at 6.30%.</p> <p>Trigger(s): Office of the Secretary of Defense (OSD) (1,593 employees) is below the PwTD benchmark of 2% at 1.82%.</p> <p>Trigger(s): Defense Legal Services Agency (DLSA) (140 employees) is below the PwD 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 PwTD benchmark of 2% at 0.00%.</p> | | | |

| | | | | |
|---|--|---|------------------------------------|-------------------------------------|
| | <p>Trigger(s): Pentagon Force Protection Agency (PFPA) (1074 employees) is below the PwTD benchmark of 2% at 0.00%.</p> <p>Trigger(s): U.S. Court of Appeals for the Armed Forces (USCAAF) (23 employees) is below the PwTD benchmark of 2% at 0.00%.</p> <p>Trigger(s): Defense Technology Security Administration (DTSA) (127 employees) is below the PwTD benchmark of 2% at 0.79%.</p> | | | |
| Barrier(s) | None | | | |
| Objective(s) | Increase advancement, and workforce recruitment for PwD and PwTD in Mission Critical Occupations | | | |
| Responsible Official(s) | Performance Standards Address the Plan? (Yes or No) | | | |
| Erika Deas-Johnson, Supervisor Special Employment Programs Branch, HRD | No | | | |
| Barrier Analysis Process Completed? (Yes or No) | Barrier(s) Identified? (Yes or No) | | | |
| No | No | | | |
| Sources of Data | Sources Reviewed? (Yes or No) | Identify Information Collected | | |
| Workforce Data Tables | Yes | Table B2: Permanent Workforce by Component – Distribution by Disability | | |
| Complaint Data (Trends) | No | | | |
| Grievance Data (Trends) | No | | | |
| Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes) | No | | | |
| Climate Assessment Survey (e.g., FEVS) | No | | | |
| Exit Interview Data | No | | | |
| Focus Groups | No | | | |
| Interviews | No | | | |
| Reports (e.g., Congress, EEOC, MSPB, GAO, OPM) | No | | | |
| Other (Please Describe) | | | | |
| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Staffing & Funding (Yes or No) | Modified Date (mm/dd/yy yy) | Completion Date (mm/dd/yyyy) |
| | | | | |
| Fiscal Year | Accomplishments | | | |
| 2021 | No accomplishments at this time | | | |
| | <p>Recognition and Awards by Disability</p> <p>Table B9: Employee Recognition and Awards by Disability</p> <p>Trigger(s): There are triggers in the following award categories: Time off 11-20, 21-</p> | | | |

| | | | | |
|---|---|--|------------------------------------|-------------------------------------|
| Trigger 3 | <p>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 PwD 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 PwD 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 PwD and PwTD receiving QSI's is lower than the inclusion rate of people without disabilities receiving QSI's.</p> | | | |
| Barrier(s) | None | | | |
| Objective(s) | | | | |
| Responsible Official(s) | Performance Standards Address the Plan? (Yes or No) | | | |
| Erika Deas-Johnson, Supervisor Special Employment Programs Branch, HRD | No | | | |
| Barrier Analysis Process Completed? (Yes or No) | Barrier(s) Identified? (Yes or No) | | | |
| No | No | | | |
| Sources of Data | Sources Reviewed? (Yes or No) | Identify Information Collected | | |
| Workforce Data Tables | Yes | Table B13; Table B9: Employee Recognition and Awards by Disability | | |
| Complaint Data (Trends) | No | | | |
| Grievance Data (Trends) | No | | | |
| Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes) | No | | | |
| Climate Assessment Survey (e.g., FEVS) | No | | | |
| Exit Interview Data | No | | | |
| Focus Groups | No | | | |
| Interviews | No | | | |
| Reports (e.g., Congress, EEOC, MSPB, GAO, OPM) | No | | | |
| Other (Please Describe) | | | | |
| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Staffing & Funding (Yes or No) | Modified Date (mm/dd/yy yy) | Completion Date (mm/dd/yyyy) |
| 03/31/2022 | Establish Disability Working Group | Yes | | |

| | | | | |
|--------------------|---|-----|--|--|
| 6/01/2022 | Update the EEO external website to include 504/508 complaint information in the Disability Outreach section. | Yes | | |
| 08/30/2022 | Collaborate w/HR to identify whether triggers exist within the Career Development Program for PWDs and PWTDS. | Yes | | |
| 9/30/2022 | Develop a Disability Newsletter for WHS Agency | Yes | | |
| 9/30/2022 | Collaborate with HR to create a drive for WHS employees to update their SF 256 | Yes | | |
| 9/30/2022 | Review PAS instructions for WHS agency | Yes | | |
| Fiscal Year | Accomplishments | | | |
| 2021 | No accomplishments at this time | | | |

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

No accomplishments were provided at this time.

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

No accomplishments were provided at this time.

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.

No accomplishments were provided at this time.