

**Management Directive 715 (MD – 715)
FY 2023 Status Report and FY 2024 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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EEOC FORM 715-01 PART A - D	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT
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For period covering October 1, 2022 to September 30, 2023

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	4,959	1,004	5,963

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

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

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

EEOP Staff	Name	Title	Series	Pay Plan and Grade	Phone Number	Email Address
Principal Equal Employment Opportunity (EEO) Director/Official	Pamela R. Sullivan	EEO Director	GS-260	15	571-372-2222	pamela.r.sullivan2.civ@mail.mil
Affirmative Employment Program (AEP) Manager	James Parker	Chief, AEP and Alternative Dispute Resolution (ADR) Manager	GS-260	14	571-372-0844	james.a.parker290.civ@mail.mil
Complaint Processing Program Manager (PM)	Patrick Anderson	Chief, Complaints and Adjudication Manager	GS-260	14	571-372-0846	patrick.anderson8.civ@mail.mil
Diversity and Inclusion (D&I) Officer	James Parker	D&I Officer	GS-260	14	571-372-0844	james.a.parker290.civ@mail.mil
Disability PM	Tara Bennett-Howard	Disability PM	GS-201	13	771-215-6790	Tara.d.bennett-howard.civ@mail.mil
Special Placement Program Coordinator (Individuals with Disabilities (IwDs))	Marie Palisoc	Special Employment Program (SEP) Branch, Supervisor	GS-201	14	571-372-4092	Marie.v.palisoc.civ@mail.mil
Reasonable Accommodation (RA) PM	Tara Bennett-Howard	Disability PM	GS-201	13	771-215-6790	Tara.d.bennett-howard.civ@mail.mil
Anti-Harassment Program (AHP) Manager	Adria Bullock	AHP Manager	GS-201	12	703-380-0718	adria.n.bullock.civ@mail.mil

EEOP Staff	Name	Title	Series	Pay Plan and Grade	Phone Number	Email Address
Alternative Dispute Resolution (ADR) PM	James Parker	ADR PM	GS-260	14	571-372-0844	james.a.parker290.civ@mail.mil
Compliance Manager	Patrick Anderson	Compliance Manager	GS-260	14	571-372-0839	patrick.anderson8.civ@mail.mil
Principal MD-715 Preparer	Denise Lewis	EEO Specialist	GS-260	13	571-372-0846	denise.a.lewis12.civ@mail.mil

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

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

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

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

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

Did the agency submit the following mandatory documents?	Please respond Yes or No	Comments
Organizational Chart	YES	
EEO Policy Statement	YES	
Strategic Plan	YES	
Anti-Harassment Policy and Procedures	YES	
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	Exceeded the requirements
Diversity and Inclusion Plan under Executive Order 13583	YES	Supporting OSD ODEI Plan
Diversity Policy Statement	YES	
Human Capital Strategic Plan	NO	
EEO Strategic Plan	NO	Plan under revision -FY24 Goal
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	YES	

**EEOC FORM
715-01
PART E**

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

WASHINGTON HEADQUARTERS
SERVICES DoD

For period covering October 1, 2022, to September 30,
2023

EXECUTIVE SUMMARY

Part E.1 - Executive Summary: Mission

AGENCY MISSION

WHS is the essential services provider for the OSD, Department of Defense (DoD) agencies, and DoD offices in the National Capital Region. WHS provides a wide range of centralized capabilities to DoD headquarters, OSD, and DoD components, enabling economies of scale to deliver essential administrative services to fulfill the mission of the Department. In 2021, WHS was aligned under the day-to-day direction of the re-established Director of Administration and Management (DA&M).

WHS services are organized into several directorates and specialty offices. These teams support the mission of our Defense Department customers by managing DoD-wide programs and operations for the Pentagon Reservation (Pentagon, Mark Center, and Raven Rock Mountain Complex) and DoD-leased facilities in the National Capital Region. The WHS vision is to remain a creative, results-driven capabilities provider, recognized for excellence: responsible, reliable, resourceful, and relevant.

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

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 implementing the Civilian EEO process, information and referral services for the Military Equal Opportunity process, AEP, ADR Program, and D&I initiatives. The staff consists of an EEOP Director, 2 Branch Chiefs, 12 EEO Specialists, and 1 EEO Assistant.

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

MAJOR ACTIVITIES AND ACCOMPLISHMENTS

The following six essential elements of a Model Equal Employment Opportunity Program compose the Agency's EEO program and several noteworthy accomplishments in Fiscal Year 2023 (FY 2023).

ELEMENT 1: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP:

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

Mentoring Program: In FY 2023, PFPA, Women Leaning in for Excellence (WLE), and Employee Engagement Group (EEG) hosted a Flash Mentoring Session. The event gave the Deputy Under Secretary of Defense for Intelligence and Security, PFPA Director; PFPA Executive Director for Law Enforcement, PFPA Chief of Staff; and PFPA Pentagon Police Major an opportunity to provide a one-hour flash mentoring session to PFPA's employees. A total of 53 participated in the mentoring session. This initiative will continue quarterly until a formal Agency-wide Program is established.

Diversity Working Group (WG): In FY 2023, PFPA Chief Diversity Officer (CDO) led the Diversity Equity Inclusion Accessibility (DEIA) WG and participated as a speaker on the CDOs panel at the 2023 Women in Federal Law Enforcement (WIFLE) Annual Leadership Training Conference in Tampa, FL. The WG developed recruiting and retention recommendations for Recruiting Medical Fitness Division (RMFD) and Human Capital Program Management (HCPM) consideration and phased implementation; the EEO/DEIA Workforce Training was revised to meet PFPA culture and climate needs. The revised training is scheduled to launch in 2024. In FY 2024, PFPA plans to develop an Office of Workplace Culture and Employee Engagement under the DEIA WG, where all related initiatives will reside. In addition, PFPA intends to procure and install Employee Resource Boards in breakrooms, including PFPA Anti-Harassment Policy Memos and the EEO Complaint Process. The WG will expand internal and external detail assignments through strategic partnerships and transition from monthly heritage observances to an annual "Unity Day" concept and continue its non-cultural awareness observances such as Disability, Suicide, SHARP, Veterans Day, Women's History, etc. Future plans are to grow and enhance communication opportunities through the chain of commands by increasing employee input and feedback forums with surveys, focus groups, listening sessions, brown bags, Director's Feedback Line, touchscreen kiosks, phone apps, and digital info boards.

ELEMENT 2. INTEGRATION INTO AGENCY'S STRATEGIC MISSION:

EEO Director Involvement: The WHS EEOP Director reports directly to the WHS Director, with whom she met weekly in FY 2023. Additionally, she advised the WHS Director and senior leaders on strategies

that promote an environment free of discrimination. The EEOP Director attended weekly WHS Leadership staff meetings and kept members apprised of EEO trends, progress, and concerns. Additionally, the EEOP Director participated in various forums such as: the Human Resource Directorate (HRD) Customer Focus Forum, Senior Administrative Officers Forum, Defense Diversity WG, and the WHS Quarterly Facility Access Task Force, creating close working relationships within the agency. The EEOP Director also attended the Mark Center Building Council meetings to maintain awareness of facilities' logistics related to architectural barriers.

State of the Agency Brief: The WHS EEOP Director and the Chief AEP presented the annual State of the Agency briefing to the WHS Director and senior officials. The presentation provided an overall assessment of the Agency's performance from each of the six essential elements and EEOP FY 2023 initiatives to gain leadership buy-in and support.

Exit Survey Questions Revision: WHS HRD established a working group to update the WHS employee exit interview. The purpose was to ensure the Agency receives feedback regarding recruitment, hiring, inclusion, and the advancement of persons with disabilities (PwDs), as directed by EEOC. The survey

was implemented in July 2023. To date, HRD has received approximately 50 surveys. In FY 2024, data will be collected and shared with other Directorates and Serviced Components. DARPA's Agency Director, Deputy Director, and Strategic Resources Director conducted exit interviews to assess employee experience and identify opportunities to improve agency culture, recruitment, retention, and engagement.

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

- **DARPA** launched **DARPA Connect** to broaden the Agency's reach and stimulate growth and collaboration with small businesses and educational institutions new to the national security space. DARPA Connect aims to break down barriers to find groundbreaking solutions for underrepresented groups, diverse, and non-traditional performers. Events are designed to educate, motivate, and inspire non-traditional performers and underrepresented academic organizations, including Historically Black Colleges and Universities (HBCUs) and Minority Serving Institutions, to engage with DARPA to grow the national security innovation ecosystem. DARPA National Center for Women and Information Technology conducted a two-phase, six-month study of our recruiting efforts at the request of the DARPA Director to understand internal hiring practices. DARPA leaders were interviewed, and their hiring processes were assessed and reviewed to develop more robust and all-inclusive recruiting strategies.
- **PFPA** acquired access to the Salesforce cloud-based Software System (SFS) featuring an applicant-facing portal, making collecting information and interacting with applicants significantly accessible and efficient. Recruiting Medical Fitness Division (RMFD) worked with SFS PMs and software engineers to develop search engines in SFS to track applicants through the hiring process. An algorithm was developed to track females and minorities to identify trends involving SFS applicants. This feature has successfully identified certain regions where a large population of PFPA applicants exists, including females and minorities (specifically a concentration of Hispanic applicants from Puerto Rico). PFPA RMFD coordinated with the WIFLE leadership, who posted agency job offer announcements on their various WIFLE-base portals and collaborated with approximately 4,500 students pursuing Criminal Justice Degree programs at various colleges across the United States (U.S.). During the reporting period, RMFD also deployed recruiters to local college campuses in cities and military installations after

attending recruiting fairs. Those college efforts focused on HBCUs targeting minorities from these colleges and universities.

- In FY 2023, **Cost Assessment and Program Evaluation (CAPE)** participated in the following outreach events: the City University of New York Graduate School (one of the most diverse universities in the United States) HBCU/MI Symposium hosted by the DoD HBCU/MI Summer Research Internship Program; DoD Civilian Careers - Virtual Career Fair 2023; Federal Asian Pacific American Council (FAPAC) Career fair, (George Mason University Partnership) HBCU/MI Internship, Tufts internship (two women, one minority). In FY 2024, CAPE will participate in several recruitment and outreach events focusing on women and minorities, including the Women's Colleges and Universities Diversity Career Expo, which includes ten women's institutions from around the U.S. CAPE will also participate in DoD-wide "Taking the Pentagon to the People" recruitment events organized by HBCU/MIs.
- **Joint Chiefs of Staff (JS) Civilian Personnel Branch (CPB)** instituted Grub Hub, a monthly meeting for JS Managers. The most relevant accomplishments are (1) legal corner, where the JS Attorneys talk to management about various issues regarding RA, anti-harassment, and general information on EEO, and (2) CPB and Defense Logistics Agency (DLA) briefed on disabled veteran hiring authorities, flexibilities, and practices. These interactions included communicating how JS's hiring managers can hire and incorporate disabled veterans into the workforce.

ELEMENT 3. MANAGEMENT AND PROGRAM ACCOUNTABILITY

Creating Inclusive Workforce Engagement Activities:

- **DARPA** hosted DARPA trainings and workshops incorporating Employee Assistance Program seminars to foster engagement and facilitate deeper conversations on topics such as Unconscious Bias, Cultivating Civility in Your Work Environment, Money and Women – Create Financial Wellness, and Autism Awareness Month. DARPA also provided the workforce with tools and resources available for employees on the web portal.
- **CAPE** continues to leverage its grassroots CAPE Cultural Committee (CCC), which launched as an MS Teams channel to assist employees in organizing activities, including health and wellness, and other leisure-type activities. The CCC sponsored a food drive team-building event for the organization. CAPE established a "Women of CAPE" group, which is available to all employees and supporters in the organization. The group meets bi-weekly to build comradery and support. In addition, CCC is currently finalizing its organization DEIA Strategic Plan to ensure a diverse talent pipeline, through increased outreach activities, targeting women and minorities.

Reasonable Accommodations (RA) and Personal Assistance Services (PAS): WHS provided training on reasonable accommodations to supervisors and managers, discussing assistive technologies available to assist employees in modifying their workspace and effectively helping with their acclimation to the workplace. In FY23, HRD received 115 new RA requests, ranging from assistive technology, ergonomic assessments, and furniture to telework. HRD also continued providing PAS, as needed.

American Sign Language (ASL) Interpreting Program (ASLIP): WHS ASLIP team offers both ASL interpreting and reader support services to employees for workplace meetings, training, phone calls, workshops, and special events. In FY 2023, WHS provided RA services for 11 employees (8 deaf and hard-of-hearing employees and 3 blind and low-vision employees). WHS received 2,596 ASLIP service

requests and 382 requests for reader services. The average processing time for each request was less than 60 minutes. In addition to providing RAs, the ASLIP team designs and provides lessons on ASL and best practices regarding the use of interpreters in the workplace, co-taught by deaf WHS employees.

ELEMENT 4. PROACTIVE PREVENTION

Anti-Harassment Program (AHP): In FY 2023, the AH Administrative Instruction and Standard Operating Procedures, in accordance with EEOC’s requirements, have been drafted and are pending review

by the Policy and Administrative Support Division. An Appointment and Policy Memorandum, reviewed by EEO, has been prepared and is pending review by the WHS Office of General Counsel (OGC). Outcome letter templates were developed to ease the administration of the AHP. An anonymous method of reporting cases is still being developed. Discussions have been held to utilize technology to track the process. JS had a total of eight anti-harassment cases, all of which were fully investigated and resolved.

Disability Working Group (DWG): In FY 2023, WHS EEO and HRD established the DWG. The DWG consists of a Senior Executive Service (SES) Champion, facilitator, and eight volunteers. The group will examine the following areas: recruitment and outreach, career development and training, data analysis and communication. The group is currently working on building its infrastructure and selecting volunteers to assess internal practices and benchmarking with other agencies.

EEO Annual Training for Supervisors and Employees: In FY 2023, WHS continued to provide EEO training for all supervisors and employees. The training included the Complaints process, Anti-Harassment process, ADR, Diversity and EEO laws and guidance. The following breakdown is as follows:

Training	Attendees
EEO and Anti-Harassment for Supervisors	459
EEO and Anti-Harassment for Non-Supervisors	2,603
Basics of Conflict Management for Supervisors	311
Embracing Inclusion	245
No FEAR Act (online) Training	1,576
Total	4,949

DARPA conducted No FEAR Act Training for Managers and Employees to reaffirm DARPA's commitment to a productive environment free from discrimination, harassment, and reprisal. There was 100% employee participation in No FEAR Act Training. PFPA provides Police Officer Training, *Fair and Impartial Policing*; this training explores how implicit biases can impact our thoughts and our behaviors, including information and skills to help police officers reduce and manage various types of biases, such as implicit associations, attentional bias, confirmation bias, we/they bias, and dehumanization. In addition, EEOP provided PFPA with Anti-Harassment and Diversity for Non-Supervisors, Supervisors, Managers and Team Leads. This training covers subject areas, including the supervisor's role in EEO, prevention of workplace harassment, DEIA, and ADR Program.

ELEMENT 5. EFFICIENCY

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

Complaints (Status and Update): During FY 2023, 76 pre-complaints resulted in 39 individuals filing formal complaints. There was 1 settlement and 34 withdrawals (no complaints filed). In FY 2022, there were 10 settlements; compared to FY 2023, there was 1 successful settlement. ADR was offered 10 times (reflecting approximately a 7.6% offer rate). The Agency continued to utilize the MicroPact iComplaints software to track and process complaints in accordance with regulatory timelines.

ADR Program: The ADR Program provides essential services that contribute to the WHS mission by providing management and employees with various methods to resolve disputes, address workplace concerns, and manage conflict when it arises. Additionally, the ADR Program provides managers with services to assess workplace environment so that issues can be addressed early. In FY 2023, the ADR Program office conducted 26 mediations to address EEO complaints of alleged discrimination and 6 sessions to address non-EEO workplace issues. The Program supported the DoD Shared Neutral Program by facilitating five mediations outside its serviced population. Additionally, the program facilitated 19 climate surveys, and 18 sensing sessions for several organizations. Other activities included conducting training sessions titled "Basics of Conflict Management." EEOP also hosted its annual ADR and Conflict Management Symposium, during the first quarter of FY 2023. The event, titled "Building Bridges and Breaking Barriers: Expanding ADR and Conflict Management Competencies," was held virtually for two half-days and featured speakers from various DoD components and other Federal Agencies and non-governmental organizations. The EEO Complaints Manager and EEO Specialists actively encourage the use of ADR at each stage of the complaint process, providing positive information on ADR and its benefits in EEO-related matters. This information is also provided during EEO and Anti-Harassment training.

ELEMENT 6. RESPONSIVENESS AND LEGAL COMPLIANCE

Compliance with EEOC: WHS fully complied with all laws, including EEOC regulations, Orders, Decisions, and Settlement Agreements. All documents requiring legal sufficiency review were coordinated with the WHS' OGC. EEOP posted all required No FEAR Act information, provided required training, and timely filed the MD-715, EEOC Form 462 reports, and other reports required by EEOC and the OPM. WHS timely implements corrective actions, such as facility postings, trainings, and reviews disciplinary actions, as appropriate.

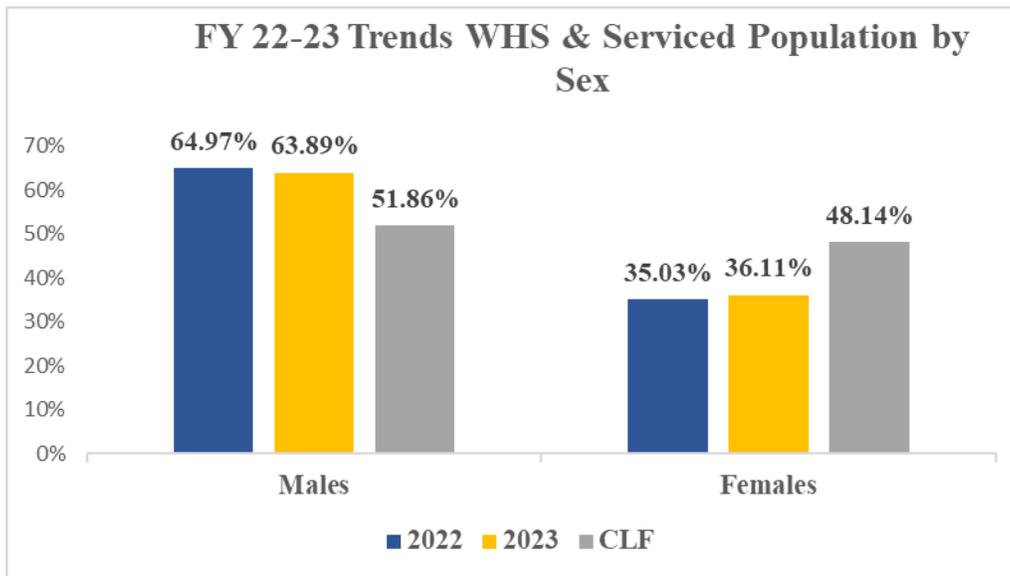
Office of General Counsel (OGC): EEOP maintained a cooperative relationship with WHS OGC, and consulted on legal issues, matters of mutual interest, and sought advice and expertise when dealing with unique situations.

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

Part E.3 - Executive Summary: Workforce Analyses

WORKFORCE ANALYSIS

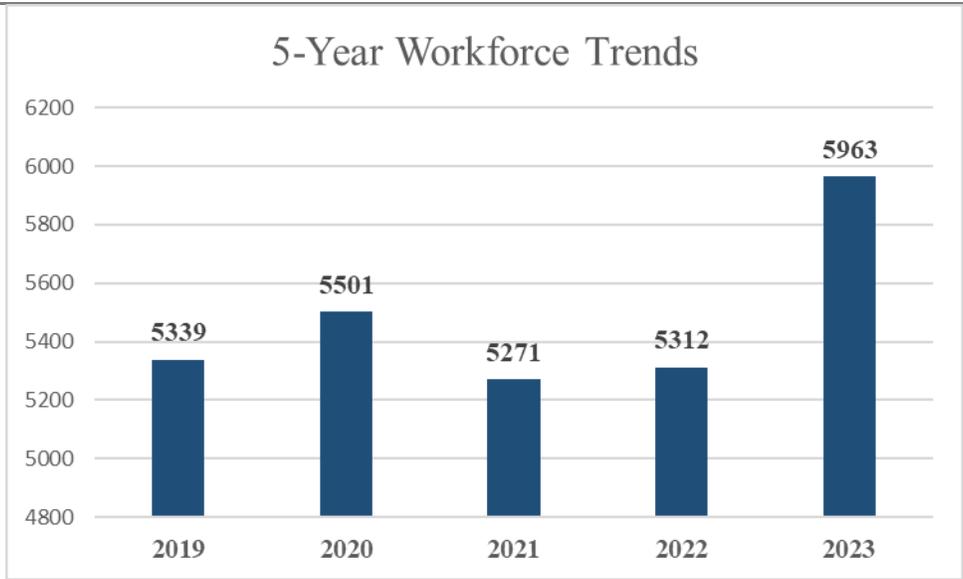
Overall Workforce: At the end of FY 2023, WHS and WHS-serviced Components totaled (permanent and temporary) workforce of 5,963 full-time and part-time employees, an increase from 5,312 employees reported in FY 2023. Of the 5,963 employees, 3,810 (63.89%) were males, and 2,153 (36.11%) were females. Compared to the U.S. Census Bureau 2010 Civilian Labor Force (CLF)¹, WHS has a smaller population of females and a larger population of males. Demographic data was extracted from the Business Objects Enterprise Reporting Service, and the census data was used as a benchmark.



In FY 2023, male’s workforce slightly decreased from FY 2022, while the female’s workforce slightly increased.

WHS workforce 5-year trends are as follows:

¹ The CLF is derived from the United States Census and reflects persons 16 years of age or older who were employed or seeking employment, excluding those in the Armed Services. CLF data used in this Report is based on the 2010 Census.



Over the 5 years, the WHS workforce has fluctuated, with the highest to lowest years in FY 2023, FY 2020, FY 2019, FY 2022, and FY 2021.

Section 501 of the Rehabilitation Act Disability Goals: DoD adopted the Federal goal of 12% for hiring PwDs and 2% for hiring persons with targeted disabilities (PwTDs). In FY 2023, PwDs represented 10.16%, and PwTDs represented 1.83% of the workforce compared to PwDs at 10.07% and PwTDs at 1.77% in FY 2022 (*Table B1*).

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

- PwD² – 10.16% versus Federal goal of 12%
- PwTDs³ – 1.83% versus Federal goal of 2%

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

- Hispanic females were 2.01%, which is below the CLF of 6.16%
- White females were 20.63%, which is below the CLF of 35.64%
- Black females were 9.63%, which is above the CLF of 6.61%
- Asian females were 2.16%, which is slightly below the CLF of 2.18%
- Native Hawaiian females were .15%, which is below the CLF of .031%
- American Indian females were 0.12%, which is above the CLF of .08%
- Two or more races’ females were 1.40%, which is above the CLF of 1.05%

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. Office of Personnel Management (OPM) modified the definition in 2010 and again in 2016. Targeted disabilities are listed on Table B1-20.

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

- Hispanic males were 3.35%, which is below the CLF of 6.82%
- Hispanic females were 2.01%, which is below the CLF of 6.16%

Representation of Hispanic males decreased, while Hispanic females’ representation increased slightly during FY 2023, but remained below the CLF, -3.47%, and -4.15%, respectfully.

The Agency breakdown by Components is as follows:

WHS-serviced Components	Males	Females	Total Workforce
*AFRH	--	--	--
DARPA	131	67	198
DAU	484	235	719
DLSA	75	58	133
DPAA	187	106	293
DTRMC	16	3	19
DTSA	80	36	116
OLDCC	28	22	50
OCJCS and JS	653	283	936
OSD	1,116	838	1,954
PFPA	894	172	1,066
WHS	787	516	1,303
USCAAF	12	13	25

*Data was not available for this agency.

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

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

WHS serviced Components	2% Goal	12 % Goal
OSD	1.69%	9.39%
DTRMC	5.26%	5.26%
DLSA	0.75%	9.77%
OLDCC	0.00%	4.00%
PFPA	1.13%	7.13%
USCAAF	0.00%	0.00%
DPAA	0.68%	14.68%
DTSA	1.72%	6.90%
DARPA	0.51%	4.55%
WHS	3.38%	15.43%

WHS exceeded the goals of 12% for PwDs and 2% for PwTDs from FY 2019 to FY 2023:

Fiscal Year (FY)	PwDs (12%)	PwTDs (2%)
FY 2019	14.04%	2.51%
FY 2020	13.83%	2.95%
FY 2021	14.19%	3.30%
FY 2022	14.53%	3.27%
FY 2023	15.43%	3.38%

SES and other Senior Grade Levels

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

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

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

GS-13 Grades: For permanent GS-13 employees, White males, Black males and females, Asian males and females, and two or more races’ males and females, were above their respective CLF. All other groups were below their respective CLF (*Table A4P*).

PwDs and PwTDs at SES and other Senior Levels

SES: For permanent employees in the SES, 6.39% identified as PwDs, and 0.38% identified as PwTDs.

GS-15 Grades: For permanent GS-15 employees, 8.99% identified as PwDs, and 2.12% identified as PwTDs.

GS-14 Grades: For permanent GS-14 employees, 11.55% identified as PwDs, and 1.44% identified as PwDs.

GS-13 Grades: For permanent GS-13 employees, 17.35% identified as PwDs, and 2.45% identified as PwTDs (*Table B4P*).

Mission Critical and Most Populous 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 2023, there were 4,959 permanent employees. Of these permanent employees, the following is a breakdown by mission-critical occupations:

Major Occupations	Employees
0080 - Security Specialists	188
0083 - Police Officers	699
0130 - Foreign Affairs Specialists	215
0301- Miscellaneous Administration and Programs Specialists	750
0343 - Management and Program Analysts	660
1102 - Contracting Specialists	206
2210 - Information Technology Specialists	99

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

Applicant Flow Data (AFD)

In FY 2023, WHS received AFD from OPM and analyzed the Agency’s mission-critical occupations. The table below show the recruitment results by gender.

Internal Competitive Promotion by Gender

	Males Applied	Males Qualified	Males Selected	Females Applied	Females Qualified	Females Selected
0080	69	36	2	26	13	0
0083	87	46	1	7	3	0
0301	338	133	5	303	87	4
0343	374	94	7	357	61	7
1102	57	17	0	50	17	3

New Hires by Gender

	Males Applied	Males Qualified	Males Selected	Females Applied	Females Qualified	Females Selected
0080	250	169	3	82	67	0
0130	15	12	1	14	13	0
0301	792	464	15	564	364	8
0343	522	253	7	424	259	2
1102	67	21	0	56	28	2
2210	572	319	10	178	82	3

PwDs and PwTDs for the following mission critical occupations.

Major Occupations	2%	12%
0080 - Security Specialists	3.19	16.49
0083 - Police Officers	.014	2.86
0130 - Foreign Affairs Specialists	0.00	3.72
0301- Miscellaneous Administration and Programs Specialists	2.00	12.13
0343 - Management and Program Analysts	4.24	14.85
1102 - Contracting Specialists	1.94	4.00
2210 - Information Technology Specialists	3.03	16.16

Series 0083, 0130, and 1102 did not meet nor exceed the goal of 12% for PwDs and 2% PwTDs.

AFD for New Hires Management Positions.

- **Executives** received 222 applications for 8 New Hires postings with 5 selections. Of the 222 applicants, 172 were qualified (133 males and 39 females). Of the five selections, three were White males, and two were White females.
- **Managers** received 476 applications for 15 New Hires postings with 4 selections. Of the 476 applicants, 300 were qualified (206 males and 94 females). Of the four selections, three were White females, and one Black female.
- **Supervisors** received 36 applications for 1 New Hires posting with 1 selection. Of the 36 applicants, 20 were qualified (6 males and 14 females), 1 Black female was selected.

AFD for Internal Promotion Management Positions.

- **Executives** received 208 applications for 11 Internal Promotion postings with 8 selections. Of the 208 applicants, 95 were qualified (77 males and 18 females). Of the eight selections, two were Hispanic, three were White males, one Asian and two White females.
- **Managers** received 190 applications for 9 Internal Promotion postings with 7 selections. Of the 190 applicants, 98 were qualified (67 males and 31 females). Of the seven selections, four were males and three were females.

New Hires - WHS and WHS-serviced Components hired 421 permanent and 356 temporary employees in FY 2023. Overall, females were hired for permanent positions (42.52%) at a lower rate than males (57.48%). White males (34.68%) were hired at almost twice the rate of Black males (12.59%); Asian males were hired at 4.51%. White and Asian females were hired at rates slightly lower than the CLF. A total of 12 Hispanic females were hired at a rate of 2.85%. There were 41 permanent and 13 temporary PwDs and 7 permanent and 5 temporary PwTDs hired in FY 2023 (*See Table A8 and B8*).

Employee Recognition and Awards - A review of *Table A13* reflects males and females received time-off awards (1-9 hours). Males received 53.63% of the awards and females 46.37%. Hispanic males (2.23%) and females (3.35%), White males (26.26%) and White females (20.11%), and Black males (21.23%) and Black females (18.44%) are below the workforce representation for time-off awards. No time-off awards were given to Native Hawaiian or Other Pacific Islander females nor American Indian or Alaska Native males and females.

On average, in the category of **cash awards \$500 and under**, males received higher cash awards than females (\$266 versus \$166). *Table B13* depicts the average cash award for PwDs was commensurate with all employees (\$437); however, the average cash award for PwTDs was higher at \$398. For **cash awards of \$2,000 - \$2,999**, males received 66.06%, with an average of \$2,288, while females received a higher average of \$2,339. Cash awards of \$2,000 - \$2,999 for PwDs averaged \$2,314 and \$2,381 for PwTDs.

Three hundred and eleven **Quality Step Increases (QSIs)** were given in FY 2023 based on the FY 2022 performance cycle. Of those, 55.95% were males, and 44.05% were females. No or minimal QSI awards were given to American Indian or Alaska Native and Native Hawaiian or Other Pacific Islander female

employee. There were 38 (12.22%) PwDs and 7 (2.25%) PwTDs who received awards in this category (*See Tables A13 and B13*).

Employee Separations – In FY 2023, 586 employees separated from the Agency. Males separated at 66.21% (388) and females separated at 33.79% (198), while females represent 36.11% of the workforce. Of the 586 separations, 3 were removals, 180 were resignations, 185 were retirements, and the remaining 218 were other separations. Of the three removals, two were males and one female. In FY 2023, 57 (9.73%) PwDs and 10 (1.71%) PwTDs separated from the Agency (*Tables A14 and B14*).

Part E.5 - Executive Summary: Planned Activities

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

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

B.6.a - Are senior managers involved in the implementation of Special Emphasis Programs (SEP)?

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

EEOC FORM 715-01 PART F	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT
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CERTIFICATION of ESTABLISHMENT of CONTINUING EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS

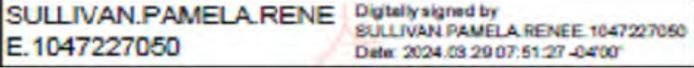
I, Pamela R. Sullivan, am the Director, Office of Equal Employment Opportunity Programs (EEOP)

Principal EEO Director/Official For	WHS and WHS serviced components
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The Agency has conducted as annual self-assessment of section 717 and section 501 programs against the essential elements as prescribed by EEO MD-17. If an essential element was not fully compliant with the standards of EEO MD-17, 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.

	3/29/24
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Pamela R. Sullivan Director, EEOP (Signature of Principal EEO Director/Official Certifies that this Federal Agency Annual EEOP is in Compliance with EEO MD-715)	Date
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	4/3/24
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Regina F. Meiners Director, WHS (Signature of Agency Head of Agency Head Designee)	Date
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EEOC FORM 715-01 PART G	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
WASHINGTON HEADQUARTERS SERVICES DOD	For period covering October 1, 2022 to September 30, 2023	

AGENCY SELF-ASSESSMENT CHECKLIST MEASURING ESSENTIAL ELEMENTS

Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP

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

Measures	Compliance Indicator: A.1 – The agency issues an effective, up to date EEO policy statement	Measure Met? (YES, No, N/A)	Comments
A.1.a	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency’s commitment to EEO for all employees and applicants? If “yes”, please provide the annual issuance date in the comments column. [see MD-715, II(A)]	YES	January 2024
A.1.b	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]	YES	

Measures	Compliance Indicator: A.2 – The agency has communicated EEO policies and procedures to all employees.	Measure Met? (YES, No, N/A)	Comments
A.2.a	Does the agency disseminate the following policies and procedures to all employees:		
A.2.a.1	Anti-harassment policy? [see MD 715, II(A)]	YES	
A.2.a.2	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	YES	
A.2.b	Does the agency prominently post the following information throughout the workplace and on its public website:	YES	
A.2.b.1	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]	YES	

Measures	Compliance Indicator: A.2 – The agency has communicated EEO policies and procedures to all employees.	Measure Met? (YES, No, N/A)	Comments
A.2.b.2	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	YES	
A.2.b.3	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column. https://whs.sp.pentagon.mil/HRD/DDR/SitePages/Disability.aspx	YES	
A.2.c	Does the agency inform its employees about the following topics:		
A.2.c.1	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often.	YES	During EEO Monthly Training
A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	YES	During EEO Monthly Training
A.2.c.3	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	YES	During EEO Monthly Training
A.2.c.4	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.	YES	
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.	YES	

Measures	Compliance Indicator: A.3 – The agency assesses and ensures EEO principles are part of its culture.	Measure Met? (YES, No, N/A)	Comments
A.3.a	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.	YES	
A.3.b	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	YES	

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

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

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

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

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

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

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

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

Measures	Compliance Indicator: B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.	Measure Met? (YES, No, N/A)	Comments
B.5.a	Pursuant to 29 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	EEO Complaint Process? [see MD-715(II)(B)]	YES	
B.5.a.2	Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]	YES	
B.5.a.3	Anti-Harassment Policy? [see MD-715(II)(B)]	YES	
B.5.a.4	Supervisory, managerial, communication and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	YES	

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

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

Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY
This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency’s EEO Program and Plan.

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

Measures	Compliance Indicator: C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (YES, No, N/A)	Comments
C.2.a	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC’s enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	YES	
C.2.a.1	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	NO	Closed in FY 2023
C.2.a.2	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	YES	
C.2.a.3	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	YES	
C.2.a.4	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [see Enforcement Guidance, V.C.]	YES	
C.2.a.5	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <u>Complainant v. Department of Veterans Affairs</u> , EEOC Appeal No. 0120123232 (May 21, 2015); <u>Complainant v. Department of Defense (Defense Commissary Agency)</u> , EEOC Appeal No. 0120130331 (May 29, 2015)] If “no”, please provide the percentage of timely-processed inquiries in the comment’s column.	YES	
C.2.a.6	Do the agency’s training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR 1614.203(d)(2)]	YES	

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

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

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

Measures	Compliance Indicator: C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.	Measure Met? (YES, No, N/A)	Comments
C.4.a	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	YES	
C.4.b	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	YES	This deficiency was closed FY 2022. EEOP continues to review policies and practices annually.
C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	YES	
C.4.d	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	YES	
C.4.e	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:		

Measures	Compliance Indicator: C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.	Measure Met? (YES, No, N/A)	Comments
C.4.e.1	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	YES	
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	YES	
C.4.e.3	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	YES	
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	YES	
C.4.e.5	Assist in preparing the MD-715 report? [see MD-715, II(C)]	YES	

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

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

Essential Element D: PROACTIVE PREVENTION

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

Measures	Compliance Indicator: D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.	Measure Met? (YES, No, N/A)	Comments
D.1.a	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	YES	
D.1.b	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I]	YES	
D.1.c	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]	YES	

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

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

Measures	Compliance Indicator: D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.	Measure Met? (YES, No, N/A)	Comments
D.4.a	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.	YES	
D.4.b	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]	YES	
D.4.c	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]	YES	
D.4.d	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)]	YES	Conducted special recruiting efforts: Workforce Recruitment Program (WRP), Wounded Warrior Program.

Essential Element E: EFFICIENCY

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

Measures	Compliance Indicator: E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.	Measure Met? (YES, No, N/A)	Comments
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	YES	
E.1.b	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	YES	
E.1.c	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?	YES	

Measures	Compliance Indicator: E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.	Measure Met? (YES, No, N/A)	Comments
E.1.d	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments.	YES	
E.1.e	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	YES	
E.1.f	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	YES	
E.1.g	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	YES	
E.1.h	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	YES	
E.1.i	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge’s decision, pursuant to 29 CFR §1614.110(a)?	YES	
E.1.j	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If “yes”, please describe how in the comments column.	N/A	
E.1.k	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	YES	

Measures	Compliance Indicator: E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.	Measure Met? (YES, No, N/A)	Comments
E.1.1	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)]	YES	

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

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

Measures	Compliance Indicator: E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Measure Met? (YES, No, N/A)	Comments
E.4.a	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:		
E.4.a.1	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	YES	
E.4.a.2	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	YES	
E.4.a.3	Recruitment activities? [see MD-715, II(E)]	YES	
E.4.a.4	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	YES	

Measures	Compliance Indicator: E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Measure Met? (YES, No, N/A)	Comments
E.4.a.6	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	YES	

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

Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE

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

Measures	Compliance Indicator: F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.	Measure Met? (YES, No, N/A)	Comments
F.1.a	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	YES	
F.1.b	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	YES	

Measures	Compliance Indicator: F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.	Measure Met? (YES, No, N/A)	Comments
F.1.c	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	YES	
F.1.d	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	YES	
F.1.e	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	YES	

Measures	Compliance Indicator: F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Measure Met? (YES, No, N/A)	Comments
F.2.a	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	YES	
F.2.a.1	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]	YES	
F.2.a.2	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	YES	
F.2.a.3	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC’s Office of Federal Operations? [see 29 CFR §1614.403(e)]	YES	
F.2.a.4	Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	YES	

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

MD-715 – Part H - 1

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

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

Statement of Model Program Essential Element Deficiency

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

Objective(s) and Dates for EEO Plan

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

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Funding and Staffing? (Yes or No)	Modified Date	Completion Date
9/30/2022	Conduct data analysis; identify triggers and possible barriers by developing a spreadsheet.	YES		06/30/2022
01/15/2023	Conduct introductory workshops with key barrier analysis partners.	YES		05/20/2023
05/15/2024	Invite Senior leaders to participate in Special Emphasis Programs.	YES		

Report of Accomplishments

FY	Accomplishments
2023	<p>In FY 2023, WHS EEOP and HRD established the DWG. The DWG is comprised of an SES Champion, a facilitator, and eight volunteers. The DWG will examine the following areas: recruitment and outreach, career development and training, data analysis, and communication. The group is currently building its infrastructure and has selected volunteers to assess internal practices and benchmarking with other agencies.</p> <p>Also, in FY 2023, WHS EEOP developed a Women’s Action Plan to address the barriers to the female workforce, specifically Women in STEM occupations. EEOP seeks to establish a Women’s Working Group to explore root causes and connections between the triggers, its workforce statistics, and any policies, procedures, or practices that might be causing the discrepancies.</p> <p>EEOP held collaborative meetings with HRD to discuss HR/EEO-related activities to explore initiatives to attract, hire, and promote a diverse workforce, including Veterans and disability-employment-focused events. In addition, HRD and EEOP discussed outreach opportunities and hiring strategies and identified and mitigated barriers to promote successful employment programs.</p> <p>EEOP continues to analyze the workforce data, which identifies various triggers within WHS’ permanent and disability workforce, including triggers for new hires, separations, mission-critical occupations, and awards.</p>

MD-715 – Part H – 2 - Closed

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

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

Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element C C.2.a.1	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]

Objective(s) and Dates for EEO Plan

Date Initiated	Objective	Target Date	Modified Date	Date Completed
10/01/2021	Create an effective anti-harassment (AH) Program in compliance with EEOC guidance and communicate the Anti-Harassment Policy to prevent and eliminate all types of harassment.	12/30/2022	09/31/2023	12/31/2023

Responsible Official(s)

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

Planned Activities toward Completion of Objective

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

Report of Accomplishments

FY	Accomplishments
2023	<p>In FY 2023, the AH Administrative Instruction and Standard Operating Procedures, in accordance with EEOC's requirements, have been drafted and are pending review by the Policy and Administrative Support Division. An Appointment and Policy Memorandum, reviewed by EEOP, has been prepared and is pending review by the WHS OGC. Outcome letter templates were developed to ease the administration of the AHP. An anonymous method of reporting cases is still being developed. Discussions have been held to utilize technology to track the process. JS had a total of eight anti-harassment cases, all of which were fully investigated and resolved.</p> <p>In FY 2023, 29 complaints were received. All inquiries were completed within the 10-day timeframe. Employees received and completed an intake form. Then, a follow-up initial interview was scheduled to clarify the information received. Of the 29 complaints received, there were 11 closed-out cases. SES cases were referred to the DoD Inspector General's office for further investigation.</p> <p>This Part G measure was met and is no longer a program deficiency. This Part H will be closed</p>

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
Management and Program Accountability C.2.c.1	WHS has not posted its procedures for processing PAS requests on its public website.
Management and Program Accountability	WHS has not Issued compliant reasonable accommodation procedures.

Objective(s) and Dates for EEO Plan

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

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Chief Human Resources Officer/HRD	Christine N. Nalli	NO
Reasonable Accommodations PM	Avis Brooks	NO

Planned Activities toward Completion of Objective

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

Report of Accomplishments

FY	Accomplishments
2023	<p>In FY 2023, the RA team established a RA Working Group to review all aspects of the RA programs. The team reviewed and updated Form SD-827, which is currently in coordination. In addition, the team developed new brochures (virtual and printed versions) for the agency workforce, restored the RA mailbox, revised, and updated the RA training, and intranet website. In 1st Quarter of FY 2024, the selected RA PM came onboard and began servicing the needs of the Agency.</p> <p>The RA and PAS procedures (AI-114) were developed, highlighting the roles and responsibilities of various stakeholders throughout the RA process. WHS OGC is currently performing a legal sufficiency review of the RA instruction.</p> <p>The RA Coordinator continued to provide RA guidance and training to allow PwDs to apply for jobs, perform job functions, and enjoy equal access to benefits to advance within the Agency. WHS actively promoted RA awareness to supervisors and the workforce during customer-focused forums, town halls, leadership meetings, EEO trainings, and Senior Executive Diversity Seminars (SEDS).</p> <p>In addition, RA continued to provide mandatory Disability training to managers, supervisors, and Labor Management and Employee Relations (LMER), as requested, and one-on-one consultation support to managers and employees.</p>

MD-715 – Part I

Agency EEO Plan to Eliminate Identified Barrier

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

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

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 (36.11%) compared to the CLF of (48.21%). Specifically, Hispanic females (2.01%), White females (20.63%), Asian females (2.16%), and Native Hawaiian or Other Pacific Islander (0.15%) are below their respective CLFs.</p> <p>New Hires: The Agency hired 777 new employees, 312 (40.15%) females, which falls below the CLF of 48.21%.</p> <p>Separation: Five hundred and eight six employees separated the Agency in FY 2023. One Hundred and ninety-eight (33.79%) females separated, which was lower than total workforce of 36.11% and below the CLF of 48.16% of the overall WHS workforce</p>
Female Workforce GS-14 thru SES	Table A4	<p>In comparison to the permanent workforce, female representation was 36.11%. The following are areas of concern:</p> <p>The GS-15 female participation rate was 370 (37.37%). In FY 2023, the total representation for Hispanic females was 1.52% compared to the permanent workforce of 2.04%; Black females were 4.55% compared to the permanent workforce of 10.59%.</p> <p>The Senior Executive Service (SES) Hispanic female population was two (0.75%), compared to the permanent workforce rate of 1.52%. The SES Black female population was nine (3.38%), compared to the permanent workforce of 10.59%.</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
American Indian or Alaska Native Females
Two or More Races Females

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	YES	Examined the workforce data
Complaint Data (Trends)	YES	In FY23, 13 Formal Complaints were filed by Females, of which 10 claimed sex; one claimed disability, and six race; two claimed age, two color, and eight reprisal.
Grievance Data (Trends)	YES	In FY 2023, 19 Females filed, of which eight were Black, nine were White, and two were 2 two or more races compared to FY 2022, which were eight females, four were White, and four were Black.
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	YES	In FY 2023, there were 29 anti-harassment claims, of which 18 were women, one Hispanic, six White, five Black, one two or more races, and five RNOs were not identified.
Climate Assessment Survey (e.g., FEVS)	YES	In FY 2023, EEOP facilitated 19 Climate Assessment Surveys. Data will be captured and analyzed in FY 2024.
Exit Interview Data	NO	The exit survey questions were revised in FY 2023; to date, 50 employees have taken the survey. Data will be captured and analyzed in FY 2024.
Focus Groups	YES	
Interviews	NO	

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Reports (e.g., Congress, EEOC, MSPB, Government Accountability Office (GAO), OPM)	NO	
Other (Please Describe)	NO	

Status of Barrier Analysis Process

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

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
WHS needs to determine why females have a low participation rate in WHS's total workforce and why females separated the Agency at 36.11%

Objective(s) and Dates for EEO Plan

Objective	Date Initiated	Target Date	Sufficient Funding and Staffing? (Yes or No)	Modified Date	Date Completed
Collaborate with HRD's Recruitment Team on events and efforts for females.	10/01/2021	10/01/22	YES	10/01/24	

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

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

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

09/01/2023	Develop partnerships with colleges, universities that have a high percentage of women with mission critical skillsets.	09/01/2024	
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Report of Accomplishments

FY	Accomplishments
2023	<p>HRD Exit Survey Workgroup continued collaborating with EEOP on updates to the WHS employee exit interview. The survey was completed and administered to the workforce via MilSuite. To date, 50 employees have utilized the survey to provide feedback and reasons for leaving the agency. Data from the exit survey will be captured and evaluated annually.</p> <p>EEOP held collaborative meetings with HRD to discuss HR/EEO-related activities, outreach opportunities and hiring strategies for the female workforce.</p> <p>EEOP continues to analyze the workforce data, which identifies various triggers for females within WHS, including triggers for new hires, separations, mission-critical occupations, and awards.</p> <p>EEOP developed a list of undergraduate, graduate schools and universities, summer internships, and associations for women. These schools and institutions will be included in HRD’s recruitment and outreach efforts for FY 2024.</p>

MD-715 – Part I

Agency EEO Plan to Eliminate Identified Barrier

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and 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 representation in FY 2023 for males was 200 (3.35%), below the CLF of 6.82%; for Hispanic females was 120 (2.01%), below the CLF of 6.16%.</p> <p>New Hires: The Agency hired 777 employees, of whom 20 (2.57%) were Hispanic males below the CLF of 6.82% and 19 (2.45%) were Hispanic females below the CLF of 6.16%.</p> <p>Separation: Thirty-one Hispanics separated from WHS in FY 2023. Separation of Hispanic males was at 20 (3.41%), which was below the CLF of 6.82%. Of the 198 females who separated the Agency, 11 (1.88%) were Hispanics, below the CLF of 6.16%. Both males and females are below the respective CLF</p>
Senior Executive Service	Table A4	The participation rate of Hispanic males in the SES was eight (3.01%), and Hispanic females two (0.75%). The analysis reveals 104 (15.37%) Hispanic employees were at the GS-13 – GS-15 pay grades, placing them in the SES pipeline.
Major Occupation	Table A6	Hispanic males are well below the OCLF of all major occupations except for 0083 (Police Officers). Hispanic females are below major occupations except for 0343 (Management and Program Analysis).

EEO Group(s) Affected by Trigger

EEO Group
Hispanic or Latino Males
Hispanic or Latino Females

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	YES	Examined the FY 2023 workforce data.
Complaint Data (Trends)	YES	Of the 39 formal complaints filed, none were Hispanic.
Grievance Data (Trends)	YES	In FY 2023, 82 grievances were filed, of which six were Hispanic males. Compared to FY 2022, out of 23 grievances filed, one was a Hispanic male.
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	YES	In FY 2023, there were 29 anti-harassment claims, of which one Hispanic male and one female.
Climate Assessment Survey (e.g., FEVS)	YES	In FY 2023, EEOP facilitated 19 Climate Assessment Surveys. Data will be captured and analyzed in FY 2024.
Exit Interview Data	NO	The exit survey questions were revised in FY 2022; to date, 50 employees have taken the survey. Data will be captured and analyzed in FY 2024.
Focus Groups	NO	
Interviews	NO	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	NO	
Other (Please Describe)	NO	

Status of Barrier Analysis Process

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

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
The Agency continued to work on the low representation of Hispanics. In FY 2023, 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 and Staffing? (Yes or No)	Modified Date	Date Completed
Identify and address potential barriers within the Hispanic workforce.	10/01/2022	10/01/2024	YES		
Develop an outreach/recruitment plan to identify strategies to improve for Hispanic representation.	05/01/2022	05/01/2024	YES		
Utilize DefenseReady as a mechanism to track information on Agency vacancies, to include recruitment as available.	07/01/2022	07/01/2024	YES		
Analyze separation data to evaluate and explore the correlation between length of service and separation.	10/01/2022	10/01/2024	YES		

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Modified Date	Completion Date
07/01/2022	Utilize DefenseReady as a mechanism to track information of Agency vacancies to include recruitment as available.		05/15/2023
05/01/2022	Develop and implement a recruitment plan and monitor results such as applicant flow data.	05/01/2024	
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 determine why Hispanics are leaving the Agency.		

Report of Accomplishments

FY	Accomplishments
FY 2023	<p>PFPA DEIA WG members participated in the National Council for Hispanic Employee PMs and greatly benefited from sharing resources in recruitment, education, and public outreach.</p> <p>PFPA HCPM and RMFC will begin building relationships with Hispanic universities, professional organizations, and communities for targeted recruiting efforts.</p> <p>In FY 2024, WHS will continue its outreach, recruitment, hiring, and career development initiatives by creating opportunities for growth and advancement to retain Hispanic talent.</p> <p>WHS plans to participate in upcoming virtual conferences and career expos sponsored by and targeted at Hispanic organizations, including:</p> <ul style="list-style-type: none"> • National Society of Hispanic MBAs (NSHMBA) • National Congress of American Indians • Society of Hispanic Professional Engineers (SHPE) • American Indian Science and Engineering Society (AISES) • Equal Opportunity Publications Careers and the Disabled Career Expo • League of United Latin American Citizens (LULAC); and • Hispanic Association of Colleges and Universities (HACU) <p>In FY 2024, RMFD will focus on targeting Women’s colleges, HBCUs, Hispanic and Asian Law Enforcement Organization Annual training events and seminars for recruiting efforts.</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 13.59%, and the percentage of PwD in the GS-11 to SES was 12.97%, which exceeds 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 |

The percentage of PwTD in the GS-1 to GS-10 cluster was 6 (3.26%), and the PwTD in the GS-11 to SES was 2.34%, exceeding the goal of 2%.

Grade Level Cluster (GS or Alternate Pay Plan B)	Total Number	Reportable Disability #	Reportable Disability %	Targeted Disability #	Targeted Disability %
Numerical Goal		12%	12%	2%	2%
Grades GS-1 to GS 10	184	25	13.59	6	3.26
Grades GS-11 to SES	2953	375	12.70	69	2.34

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

WHS utilized various methods, including Training (HR and Leadership for New Supervisors; annual EEO and Diversity Training), quarterly newsletter, quarterly Leadership meetings, WRP, and the annual policy.

Section II: Model Disability Program

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

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

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

Yes X No 0

N/A

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

Number of FTE Staff by Employment Status

Disability Program Task	Full Time	Part Time	Collateral Day	Responsible Official (Name, Title, Office, Email)
Processing applications from PwD and PwTD	2	0	3	Marie Palisoc, HR Specialist Disability Recruitment Marie.v.palisoc.civ@mail.mil
Answering questions from the public about hiring authorities that take disability into account	3	0	3	Marie Palisoc, HR Specialist Disability Recruitment Marie.v.palisoc.civ@mail.mil
Processing reasonable accommodation requests from applicants and employees	2	0	2	Avis Brooks Reasonable Accommodation PM Avis.m.brooks2.civ@mail.mil
Section 508 Compliance	1	0	4	glenn.t.buchter.civ@mail.mil

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

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

Yes X No 0

Disability PM (EEOC), ADA, and RA Training (NELI).

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Yes X No 0

N/A

Section III: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

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

To assist job applicants with disabilities and targeted disabilities, WHS engaged in various outreach activities. In addition to extensive outreach programs, WHS also sought out PwDs and PwTDs through various programs (i.e., WRP, Wounded Warriors, and Schedule A).

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

Inclusion of a specific statement in vacancy announcements related to Special Appointing Authorities, including veterans with a disability rating of 30% or more, with links to informative webpages that further explain and clarify those appointment types. Continue utilization of special hiring authorities and job development programs for veterans, to include veterans with a disability rating of 30% or more. To this end, HRD will continue to educate hiring managers on 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 that can be used for Disabled Veterans, Pathways Interns, and recent graduates. Applicants must submit all supporting documentation to SEP employees, who verify eligibility before adding applicants to the WHS database. Efforts to improve the use of the database are ongoing.

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

Yes X No 0 N/A 0

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

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

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

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goas 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 2023, the Agency hired 54 employees who reported having a disability and 12 who reported having a targeted disability. PwTDs comprised 1.54% of the workforce of WHS and Serviced Components. Employees with reportable disabilities were 6.95% of the total workforce, compared to 9.84% at the end of FY 2022. WHS continues to work closely with Gallaudet University, other major local universities, and disability interest institutions in the National Capital Region. WHS attends prioritized events focused on disabled veterans and people with targeted disabilities, including the Hiring our Heroes career event.

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

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

Among the new hires with disabilities who voluntarily identified their disability, triggers existed for PwDs in the following most populous MCOs:

Series 0080 – 8.90% qualified compared to 0.00% selected.
 Series 0130 – 0.00% qualified compared to 0.00% selected
 Series 0301 – 6.94% qualified compared to 0.00% selected
 Series 1102 – 1.68% qualified compared to 0.00% selected
 Series 2210 – 7.23% qualified compared to 0.00% selected, a disparity in those who applied versus those who qualified among PwDs.

Among the new hires with disabilities who voluntarily identified their disability, triggers existed for PwTDs MCOs:

Series 0080 - 5.51% qualified compared to 0.33% selected.
 Series 0130 – 4.00% qualified compared to 0.00% selected.
 Series 0301 – 3.62% qualified compared to 0.00% selected.
 Series 0343 – 3.32% qualified compared to 0.00% selected.
 Series 1102 – 0.00% qualified compared to 0.00% selected.
 Series 2210 – 3.24% qualified compared to 0.00% selected, a disparity in those who applied versus those who qualified among PwTDs.

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

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

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

- Series 0080 MCO – 3.95% qualified applicants and 0.00% selected.
- Series 0130 MCO – 0.00% qualified applicants and 0.00% selected.
- Series 0301 MCO – 9.33% qualified applicants and 7.69% selected.
- Series 0343 MCO – 8.26% qualified applicants and 0.00% selected.
- Series 1102 MCO – 4.17% qualified applicants and 0.00% selected.
- Series 2210 MCO – 6.67% qualified applicants and 0.00% selected.

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

- Series 0080 MCO – 2.04% qualified applicants and 0.00% selected.
- Series 0130 MCO – 0.00% qualified applicants and 0.00% selected.
- Series 0301 MCO – 5.16% qualified applicants and 2.56% selected.
- Series 0343 MCO – 3.91% qualified applicants and 0.00% selected.
- Series 1102 MCO – 4.17% qualified applicants and 0.00% selected.

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

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

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

In comparison to the benchmarks, triggers exist among the selections for promotion involving the following positions in FY 2023.

0083 - Police Officer: PwD (2.86%) and PwTD (0.14%)

0130 - Foreign Affairs: PwD (3.72%) and PwTD (0.00%)

0301 - Miscellaneous Administration and Program: PwTD (2.00%)

1102 - Contracting: PwD (4.00%) and PwTD (1.94%)

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

B. CAREER DEVELOPMENT OPPORTUNITIES

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

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

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 X	No 0
ii. Internal Selections (PwD)	Yes X	No 0

b. Grade GS-15

i. Qualified Internal Applicants (PwD)	Yes X	No 0
ii. Internal Selections (PwD)	Yes X	No 0

c. Grade GS-14

i. Qualified Internal Applicants (PwD)	Yes X	No 0
ii. Internal Selections (PwD)	Yes X	No 0

d. Grade GS-13

i. Qualified Internal Applicants (PwD)	Yes 0	No X
ii. Internal Selections (PwD)	Yes 0	No X

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

SES – 0.00%
 GS-15 - 6.35%
 GS-14 – 9.63%
 GS-13 – 12.32%

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

SES – 0.00%
 GS-15 - 0.00%
 GS-14 – 3.13%
 GS-13 – 16.67%

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

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

SES – 0.00%
 GS-15 - 4.76%
 GS-14 – 5.00%
 GS-13 – 5.69%

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

SES – 0.00%
 GS-15 - 0.00%
 GS-14 – 0.00%
 GS-13 – 8.33%

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

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

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

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

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 X No 0
- ii. Internal Selections (PwD) Yes X No 0

b. Managers

- i. Qualified Internal Applicants (PwD) Yes X No 0
- ii. Internal Selections (PwD) Yes X No 0

c. Supervisors

- i. Qualified Internal Applicants (PwD) Yes X No 0
- ii. Internal Selections (PwD) Yes X No 0

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

PwDs Executive Qualified Applicant: 5.26%	Selections: 0.00%
PwDs Manager Qualified Applicant: 7.14%	Selections: 0.00%
PwDs Supervisor Qualified Applicant: 0.00%	Selections: 0.00%

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 X
ii. Internal Selections (PwTD)	Yes X	No 0

b. Managers

i. Qualified Internal Applicants (PwTD)	Yes 0	No X
ii. Internal Selections (PwTD)	Yes X	No 0

c. Supervisors

i. Qualified Internal Applicants (PwTD)	Yes X	No 0
ii. Internal Selections (PwTD)	Yes X	No 0

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

PwTDs Executive Qualified Applicant: 3.16%	Selections: 0.00%
PwTDs Manager Qualified Applicant: 2.04%	Selections: 0.00%
PwTDs Supervisor Qualified Applicant: 0.00%	Selections: 0.00%

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

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

PwDs Executive Selections: 0.00%	Qualified External Applicants: 10.47%
PwDs Manager Selections: 0.00%	Qualified External Applicants: 7.00%
PwDs Supervisor Selections: 0.00%	Qualified External Applicants: 10.00%

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

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

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

PwTDs Executive Selections: 0.00%	Qualified External Applicants: 10.47%
PwTDs Manager Selections: 0.00%	Qualified External Applicants: 7.00%
PwTDs Supervisor Selections: 0.00%	Qualified External Applicants: 10.00%

Section V: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Yes 0 No X N/A 0

The Agency has not established a system to monitor the status of Schedule A employees with disabilities. The Agency plans to implement a tracking system in FY 2024.

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

In FY 2023, 9.73% of PwDs separated the Agency. For PwDs, there were 33.33% removal, 8.89% resignation, and 10.27% retirement.

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

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

The Agency had 1.71% of PwTDs separated from the Agency. For PwTDs, there were 2.22% resignation and 2.16% retirement.

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

The Agency revised the exit survey in FY 2022 and FY 2023. To date, 50 employees have taken the survey. The agency plans to collect and analyze exit interview data in FY 2024.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

For information about Section 508: <http://dodcio.defense.gov/DODSection508.aspx>. Complaints should be addressed to the DoD Office of Diversity, Equity, and Inclusion (ODEI) – <http://diversity.defense.gov>.

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

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

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

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

C. REASONABLE ACCOMMODATION PROGRAM

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

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

The average processing time and implementation of accommodation requests in FY 2023 were 20 days, including receiving and reviewing medical documentation. The RA Program is located under the management of the HRD LMER Division. However, the RA PM; the Assistant Director, LMER; and the Employee Relations team members are fully available to advise managers before, during, and following the RA process to ensure the effectiveness of an accommodation.

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

WHS 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 and Inclusion Training for Supervisors. The RA PM regularly monitors accommodation requests and advises leadership of any trends.

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

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

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

WHS has finalized the PAS policy, as part of AI 114, “Reasonable Accommodation for Individuals with Disabilities,” which is currently being reviewed. To date, WHS has processed no requests for PAS. RA Policy and Procedures, which included information on PAS policy and procedures, remain published and posted on the internal website as a resource to all managers and supervisors.

Section VI: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Yes 0 No X N/A 0

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

Yes 0 No X N/A 0

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

In FY 2023, there were no findings of discrimination due to harassment, based on disability status.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Yes 0 No X N/A 0

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

Yes 0 No X N/A 0

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

In FY 2023, PFFA implemented a policy to better accommodate the affected individuals involved.

Section VII: Identification and Removal of Barriers

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

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

Yes 0 No X

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

Yes 0 No X N/A 0

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

Trigger 1	<p>Lower than expected representation of PwDs and PwTDs into Managerial Positions</p> <p>Table B3: Occupational Categories by Disability</p> <p>Trigger(s): Executive/Senior Level is below the goal of 12% for PwDs 49 (8.78%). Trigger(s): Executive/Senior Level is below the goal of 2% for PwTDs eight (1.43%).</p> <p>Trigger(s): Out of 8 occupational categories, 3 are below the goal of 12% for PwDs. Professionals (10.31%), Craft Workers (4.96%), and Service Workers (3.35%).</p> <p>Four of the eight occupational categories are below the 2% goal for PwTDs. Professionals (1.53%), Technicians (1.39%), Craft Workers (0.71%), and Service Workers (0.39%).</p> <p>Table B4: General Schedule (GS) Grades by Disability</p> <p>Trigger(s): GS-14 cluster (64 employees) is below the PwDs 12% goal at 11.55%. Trigger(s): GS-15 cluster (89 employees) is below the PwDs 12% goal at 8.99%. Trigger(s): SES cluster (17 employees) is below the PwDs 12% goal at 6.39%.</p> <p>Trigger(s): GS-14 cluster (8 employees) is below the PwTDs 2% goal at 1.44%. Trigger(s): SES cluster (1 employees) is below the PwTDs 2% goal at 0.38%.</p> <p>Table B6: Mission-Critical Occupations by Disability</p> <p>Trigger(s): PwDs is below the 12% goal in the 0083, 0130, and 1102 series. Trigger(s): PwTDs is below the 2% goal in the 0083, 0130, and 1102 series.</p>
Barrier(s)	Not Identified
Objective(s)	Increase outreach and recruitment efforts for PwDs in the senior grade levels.

Responsible Official(s)	Performance Standards Address the Plan? (Yes or No)	
Marie Palisoc, 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)	YES	Of 39 formal complaints filed, 14 were PwDs and zero PwTDs.
Grievance Data (Trends)	YES	In FY 2023, 83 grievances were filed, 7 employees being identified as having a disability. There were two with a PwTDs.
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	YES	In FY 2023, there were 29 anti-harassment claims, of which 6 were PwDs and there were 0 PwTDs.
Climate Assessment Survey (e.g., FEVS)	YES	In FY 2023, EEOP facilitated 19 Climate Assessment Surveys. Data will be captured and analyzed in FY 2024.
Exit Interview Data	NO	The exit survey questions were revised in FY 2022/23; data will be captured in FY 2024.
Focus Groups	NO	
Interviews	NO	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	NO	
Other (Please Describe)	NO	

Target Date	Planned Activities	Sufficient Staffing and Funding (Yes or No)	Modified Date	Completion Date
09/30/2022	Review PAS instructions for WHS agency	YES		09/30/2022
05/31/2023	Establish Disability Working Group	YES		05/31/2023
06/01/2023	Update the EEO external website to include 504/508 complaint information in the Disability Outreach section.	YES		

Target Date	Planned Activities	Sufficient Staffing and Funding (Yes or No)	Modified Date	Completion Date
08/30/2023	Collaborate with HRD to identify whether triggers exist within the Career Development Program for PwDs and PwTDs.	YES		
9/30/2023	Develop a Disability Newsletter for WHS Agency	YES		
9/30/2023	Collaborate with HRD to create a drive for WHS employees to update their SF 256	YES		

FY	Accomplishments
2023	<p>In FY 2023, WHS established a DWG. An SES Champion leads the group and there are 10 volunteers. The group has incorporated EEOC’s recommendation as its FY2024 Strategic Goals and Objectives. The following four goals are also the working group focus:</p> <ol style="list-style-type: none"> 1. Recruitment and Outreach 2. Career Development 3. Marketing and Communication 4. Data Analysis <p>EEOP continued its collaboration with HRD and WHS-serviced Components on the benefits and value of SEPs and OPM resources (i.e., Feds Hire Vets website and the Bender list information) to recruit, hire and retain disabled veterans and underrepresented groups. HRD engaged with hiring managers, Customer Account Managers, and WHS-serviced organizations to provide guidance, training, and awareness of special hiring authorities, including Veterans Recruitment Appointment (VRA), Veterans Employment Opportunities Act (VEOA), Schedule A, and other competitive hiring authorities. In FY 2023, SEP continued to promote Schedule A Hiring Authority and the Workforce Recruitment Program (WRP) to their customers. SEP on boarded six WRP students.</p> <p>The RA Coordinator continued to provide RA guidance and training to allow PwDs to apply for jobs, perform job functions, and enjoy equal access to benefits to advance within the Agency. WHS actively promoted RA awareness to supervisors and the workforce during customer-focus forums, town halls, leadership meetings, EEO trainings, and SEDS.</p> <p>In addition, the RA continued to provide mandatory Disability training to managers, supervisors, and LMER, as requested, and one-on-one consultation support to managers and employees.</p>

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

Lack of personnel and resources.

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

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

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

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