



# Management Directive 715 FY2025

DEFENSE COUNTERINTELLIGENCE AND SECURITY AGENCY  
Equal Employment Opportunity Commission (EEOC)  
715 Annual EEO Program Status Report

Office of Equal Employment Opportunity (OEEO)  
DEFENSE COUNTERINTELLIGENCE AND SECURITY AGENCY Quantico, VA

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1. SA Organization Chart
2. DCSA Strategic Plan
3. Equal Employment Opportunity Policy Statement
4. Alternative Dispute Resolution Process
5. Anti-Harassment Policy and Procedures
6. Reasonable Accommodation Process
7. Personal Assistance Services Process

## OVERVIEW

The Equal Employment Opportunity Commission's (EEOC) Management Directive 715 (MD-715) report details the Defense Counterintelligence and Security Agency (DCSA) Equal Employment Opportunity (EEO) Program status for Fiscal Year (FY) 2025.

Prepared in compliance with the EEOC Management Directive (MD) 715 and associated guidance<sup>1</sup>, this report satisfies obligations and requirements rooted in the following authorities: (1) Section 717 of the Civil Rights Act of 1964, as amended; (2) 42 U.S.C. § 2000e et seq. (Title VII of the Civil Rights Act of 1964); (3) the Reorganization Plan No. 1 of 1978; (4) Executive Order 11748; (5) Section 501 of the Rehabilitation Act of 1973, as amended; (6) 29 U.S.C. § 791 and (7) the Americans with Disabilities Act Amendments Act of 2008 (Pub. L. 110-325).

The foundational objective of MD-715 is the establishment and maintenance of a Federal work environment wherein all employees and applicants for employment are afforded equal opportunity, unimpeded by discrimination or harassment on the basis of race, religion, color, sex, national origin, age (40 or above), genetic information, disability, pregnancy, childbirth, or related medical conditions or reprisal for previous protected activities.

Contained herein is a synopsis of DCSA's comprehensive annual self-assessment, undertaken to identify and analyze any institutional, structural, or attitudinal impediments to equal opportunity. Furthermore, this report delineates the significant accomplishments of the DCSA in advancing EEO principles and articulates the strategic initiatives planned for FY 2026 to rectify identified deficiencies and to enhance the efficacy of DCSA's EEO Program.

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<sup>1</sup> EEOC Management Directive 715 guidance and instructions are available at <https://www.eeoc.gov/federal-sector/management-directive/instructions-federal-agencies-eco-md-715><sup>1</sup>

## PART A-D: Agency Information

### Part A – Department/Agency Identifying Information

Agency	Second Level Component	Address	City	State	Zip Code	FIPS Code
Defense Counterintelligence and Security Agency	N/A	27130 Telegraph Road	Quantico	VA	22134	DD12

### Part B – Total Employment

Total Employment	Permanent Workforce	Temporary Workforce	Non-Appropriated Fund Workforce	Total Workforce
Number of Employees	5204	0	N/A	5204

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

Agency Leadership	Name	Title
Head of Agency	Honorable Justin P. Overbaugh	Acting Director
Head of Agency Designee	Tara Jones	Acting Deputy Director

### Part C.2 – Agency Officials Responsible for Oversight of EEO Programs

EEO PROGRAM OFFICIALS	NAME	TITLE
Principal EEO Director	Ms. Rita Bhanot	OEEO Director
EEO Program Official	Mr. Mohammed B. Kabir	Deputy Director
Title VII Affirmative Employment Program	Ms. Deirdre K. Garrett	Affirmative Program Manager
Complaint Program Manager	Ms. Yolanda King	Complaints Program Manager
Disability Program Manager	Ms. Lorraine A. Lupo	Disability Program Manager
Anti-Harassment Program Manager	Ms. Deana D. Rasnick	Chief Employee Relations, HCMO
Selective Placement Coordinator	Ms. Lorraine A. Lupo	Disability Program Manager
ADR Program Manager	Ms. Yolanda M. King	Complaints Program Manager
Compliance Manager	Dr. Carey J. Williams	EEO Complaints Branch Chief
Principal MD-715 Preparer	Ms. Deirdre K. Garrett	Affirmative Employment Program Manager

### Part D.1 - List of Subordinate Components Covered in This Report

Subordinate Components*	City	State	Country	CPDF Code	FIPS Code
DCSA does not have subordinate components.					

**Part D.2 – Submission of Required Documents**

Submission of Mandatory Documents	Yes or No	Comments
DCSA Organization Chart	Yes	
DCSA Strategic Plan	Yes	
Equal Employment Opportunity Policy Statement	Yes	
Alternative Dispute Resolution Procedures	Yes	
Anti-Harassment Policy and Procedures	Yes	
Reasonable Accommodation Procedures	Yes	
Personal Assistance Services Procedures	Yes	

## **Part E: Executive Summary**

### **Part E.1**

#### **Executive Summary**

The Defense Counterintelligence and Security Agency (DCSA), as the largest security agency within the Federal Government, is fundamentally committed to fostering a model Equal Employment Opportunity (EEO) Program. Its workforce of 5,204 permanent employees executes a mission of significant importance within the national security enterprise, including conducting nearly two million annual background investigations for 95% of the Federal government, servicing over 100 Federal entities, and providing oversight for over 12,500 cleared facilities under the National Industrial Security Program (NISP).

This Management Directive 715 (MD-715) report demonstrates DCSA's sustained commitment to advancing affirmative employment initiatives beyond simple regulatory compliance. The Agency endeavors to be an organization that fosters a workplace free from unlawful discrimination, which ensures a fair, efficient, and timely EEO process for all employees and applicants. These goals and aspirations are crucial for supporting the Agency's objectives and strategic outcomes outlined in the DCSA 2025–2030 Strategic Plan.

DCSA remains steadfast in providing all employees with the freedom to compete on a fair and level playing field with equal opportunity for competition, in accordance with federal laws enforced by the Equal Employment Opportunity Commission (EEOC). The Agency is dedicated to maintaining a model workplace free from unlawful discrimination, harassment, or retaliation based on race, religion, color, sex, national origin, age, genetic information, disability, or pregnancy, childbirth, or related medical conditions in accordance with Federal statutes and regulations. This report details DCSA's continued efforts to support and promote principles of equal employment opportunity across the Agency.

#### **Mission**

DCSA's mission is to secure the trustworthiness of the U.S. Government's workforce, the integrity of its cleared industry partners, and the security of its critical technologies, services, and supply chains. The Agency accomplishes this primary mission through expert vetting, strategic industry engagement, continuous education, and robust counterintelligence and insider threat support.

#### **EEO Program**

- The Office of Equal Employment Opportunity (OEEO) is chartered to drive innovation and position DCSA as a premier Federal organization, offering robust employment opportunities within a workplace void of prohibited practices. This objective is achieved

by cultivating a trusted workforce and ensuring an environment where every employee is valued, respected, and empowered.

- DCSA-OEEO leads the Agency's commitment to equitable access, employee engagement, and a workplace free from unlawful discrimination, retaliation, or harassment. As DCSA advances these EEO priorities, the Agency reinforces the critical correlation between cultivating an elite workforce and organizational excellence and the Agency's vital national security mission as risk illuminator.

## Part E.2: Essential Elements of a Model EEO Program

In support of DCSA's workforce objectives, OEEO upholds the six essential elements for a model EEO Program, as described in MD-715. For these six essential elements in FY 2024, DCSA reported meeting 160 out of 161 essential element measures in its scorecard in Part G, reflecting a compliance score of 99%. In FY 2025, the scorecard is modified reflecting an even more robust examination and challenging circumstances. Specifically, a new EEO Director spearheaded a deep-dive and fresh examination of the Agency's program, employing a rigorous approach to auditing and management. Additionally, as part of initiatives to achieve a model EEO Program, OEEO updated or modified various policies and issuances, discovered potential discrepancies, and addressed a significant and historic influx of reasonable accommodation requests. As a result, OEEO identified 14 deficiencies in the EEO Program for FY 2025, reflecting a compliance score of 90.1%. OEEO considers the identification of these deficiencies to be a positive development for long-term health and success of the program.

EEO Essential Element	Measures*	FY 2025 #	FY 2025
Demonstrated Commitment by Agency Leadership	14	12	86.0%
Integration of EEO into the Agency's Strategic Mission	35	33	94.0%
Management and Program Accountability	45	39	86.0%
Proactive Prevention of Unlawful Discrimination	13	13	100.0%
Efficiency	33	29	88.0%
Responsiveness and Legal Compliance	12	12	100.0%
<b>TOTAL</b>			
<b>* Any measures determined to be "N/A" were not factored into the element or total scores.</b>	<b>152</b>	<b>138</b>	<b>90.1%</b>

## **1. Demonstrated Commitment from DCSA Leadership:**

DCSA leadership's commitment to equal opportunity is codified in its FY 2025-2030 EEO Strategic Plan and annual EEO Policy Statement, which mandate fair treatment and merit-based advancement. This strategic direction is implemented through a comprehensive framework of policies and procedures, including those for Reasonable Accommodation (RA), Anti-Harassment, and Alternative Dispute Resolution (ADR), ensuring all individuals are fully informed of their rights and protections under the No FEAR Act.

To ensure accountability, the Director of the Office of EEO reports directly to the DCSA Director, enabling direct communication and unfettered engagement with senior leadership. This structure reinforces a top-down organizational ethos centered on fairness, merit, and equal opportunity for all.

Notwithstanding DCSA leadership's full commitment to equal opportunity, during FY 2025, the agency had two items under its Self-Assessment Checklist that required updates. The 2025 EEO Policy Statement was determined to be non-compliant with EEOC guidance concerning the need to explicitly address the requirements and protections involving pregnancy, childbirth, or related medical conditions. DCSA completed the updates to its annual EEO Policy Statement to resolve these deficiencies.

## **2. Integration of EEO into the Agency's Strategic Mission:**

In FY 2025, DCSA fully integrated EEO principles into its overarching Strategic Plan, emphasizing that mission success is driven by its investment in people. This commitment is embedded throughout the employee lifecycle, beginning with the New Employee Experience (NEX) orientation program, where all new hires are introduced to an employee's rights and responsibilities.

This foundation is reinforced by the Director's "force multiplier" methodology, which instills a culture of fairness and respect through strict accountability and zero-tolerance for behaviors that misalign with DCSA values. To support this approach, the agency also provides continuous training and resources to the entire workforce, ensuring that employment decisions are based on qualifications and contributions and fostering a true merit-based environment.

While DCSA supports the integration of EEO into the Agency's strategic mission, during FY 2025, the Agency had two items under its Self-Assessment Checklist that require improvement as further detailed in Part G.

## **3. Management and Program Accountability:**

DCSA's commitment to EEO is managed through its first-ever EEO Strategic Plan (FY 2025-2030) and updated policies, all aligned with current Department of War (DoW) guidance. To ensure these strategies translate into measurable results, EEO goals are integrated as performance elements for leaders at all levels, including those members within Agency who are part of the Defense Intelligence Senior Executive Service (DISES).

Accountability is further driven by the Office of EEO (OEEO), which conducts rigorous self-

assessments using MD-715 and provides regular "State of EEO" briefings to the Agency's senior executives and Accountability Council.

This strategic focus is put into action through collaborative efforts with the Human Capital Management Office (HCMO) and the DCSA General Counsel (DCSA-GC). HCMO worked collaboratively with OEEO to identify and develop talent based on merit. Key initiatives include expanding recruitment outreach to a broader range of academic institutions and increasing participation in critical talent development programs, such as the résumé repository for applicants with disabilities, leadership development, and joint-duty assignments. OEEO also took significant steps to increased collaboration with DCSA-GC. These steps included seeking and receiving legal advice and counsel in development of EEO-related policies and procedures and support of the EEO function. DCSA-GC also provided legal sufficiency reviews and related consultation as part of the overall complaint process.

DCSA identified six items in its Self-Assessment Checklist that require correction and/or updates. These items encompass deficiencies in the Agency's Anti-Harassment and Reasonable Accommodation (RA) Programs as outlined in Part G. DCSA will be taking appropriate corrective actions as detailed in Part H.

#### **4. Proactive Prevention of Unlawful Discrimination:**

DCSA proactively prevents unlawful discrimination by ensuring all employees understand their rights and protections, including comprehensive anti-discrimination policies and options for filing complaints or engaging in ADR/mediation.

To facilitate early resolution, managers and supervisors are trained to address issues promptly and are encouraged to utilize the agency's ADR services to improve communication and resolve disputes at the lowest level. OEEO also supports early resolution and proactive prevention of unlawful discrimination through other EEO-related training events and opportunities provided to managers and supervisors. This entire process is supported by a robust assessment system, which uses workforce data, complaint trends, and survey results to measure progress and guide future improvements.

#### **5. Efficiency:**

DCSA has established a comprehensive framework to ensure fair and efficient resolution of disputes and to proactively identify and eliminate barriers to equal opportunity. This framework is comprised of two key areas:

The Agency maintains a fair and impartial complaint resolution process, managed through the **e-Complaints** system for real-time tracking, analysis, and trend monitoring. To ensure specialized and timely support, DCSA outsourced EEO counseling services and its ADR services to outside vendors. DCSA's ADR services are further supplemented by trained internal EEO staff who serve as counselors to ensure continuity and operational efficiency.

While DCSA has established a comprehensive framework to ensure fair and efficient resolution

of disputes, during FY 2025, the Agency had four items under its Self-Assessment Checklist that require improvement, three of which are related to timeliness of agency actions in different areas of its EEO Program and a fourth item related to the Agency's management of ADR.

In 2025, only one EEO counseling within the Agency exceeded the 90-days processing timeline, and two EEO investigations were not timely completed consistent with 29 CFR §1614.108. In addition, in 2025, only one of the eleven final agency decisions (FADs) was issued based on the suspense date. Finally, although the Agency strongly encourages managers and supervisors to participate in ADR once it has been offered, those managers and supervisors are not directed or required to participate.

### 6. Responsiveness and Legal Compliance:

DCSA maintains a steadfast commitment to full compliance with all EEO statutes, EEOC regulations, policy guidance, settlement agreements, and final orders. OEEEO reinforces this culture of accountability, ensuring leadership remains informed of any issues that could impact agency compliance through regular meetings and reports. The OEEEO and DCSA-GC collaborate on a variety of policies and legal matters, including court decisions, negotiated settlement agreements, and final Agency actions. This proactive communication loop guarantees that DCSA is responsive to any findings of discrimination and maintains robust internal controls to satisfy all mandated reporting requirements.

### Part E.3: Workforce Analysis

DCSA operates under the Excepted Service Hiring Authority, with all personnel managed through the Defense Civilian Intelligence Personnel System (DCIPS). The total permanent workforce at the conclusion of Fiscal Year (FY) 2025 was 5,204 employees. This figure represents a 5.67% net reduction in personnel during the review period from FY 2024 to FY 2025.

This section analyzes the composition of the DCSA workforce, utilizing demographic data sourced from the EEOC, DCSA, HCMO, and the Defense Logistics Agency. The analysis examines overall participation rates, grade distribution, major occupations, and the representation of Persons with Disabilities (PWDs) and Persons with Targeted Disabilities (PWTDs).

#### Workforce Participation (Table A1).

ERI-G	Race Ethnicity/National Origin	FY 2025		CLF 2014-2018	
		#	%		
	<b>Total Employees</b>	Male	2485	47.75%	51.79 %
		Female	2719	52.25%	48.21%
	<b>Hispanic or Latino</b>	Male	190	3.65%	6.82%
		Female	218	4.19%	6.16%
	<b>White</b>	Male	1707	32.80%	35.64%
		Female	1609	30.92%	31.82%
	<b>Black or African American</b>	Male	398	7.65%	5.70%

<b>Asian</b>	Female	719	13.82%	6.61%
	Male	142	2.73%	2.19%
<b>Native Hawaiian or Other Pacific Islander</b>	Female	116	2.23%	2.18%
	Male	8	.15%	.08%
<b>American Indian or Alaska Native</b>	Female	17	.33%	.08%
	Male	22	.42%	.31%
<b>Two or More Races</b>	Female	17	.33%	.31%
	Male	18	.35%	1.05%
	Female	23	.44%	1.05%

## 1. Overall Workforce Participation

Using the 2014-2018 Civilian Labor Force (CLF) data as a benchmark, DCSA's workforce analysis revealed several demographic gaps. While the Agency's overall minority representation is 36.28%, the male population (47.75%) is 4.04% below the CLF. More specifically, representation is below the CLF for Hispanic males (3.17%) and females (1.97%), White males (2.84%) and females (0.90%), and individuals of two or more races (0.70% for males and 0.61% for females). DCSA will conduct further analysis to determine if these gaps are the result of any systemic barriers. (Note: Disability representation is measured against the Federal goals of 12% for PWDs and 2% for PWTDs).

## 2. Grade

An analysis of DCSA's 5,204 permanent employees reveals distinct demographic trends across grade levels. In the junior grades (GG-5 through GG-10), participation rates are generally aligned with the overall workforce, with the exception of underrepresentation among some male demographic groups (i.e., Hispanic, White, and Multiracial).

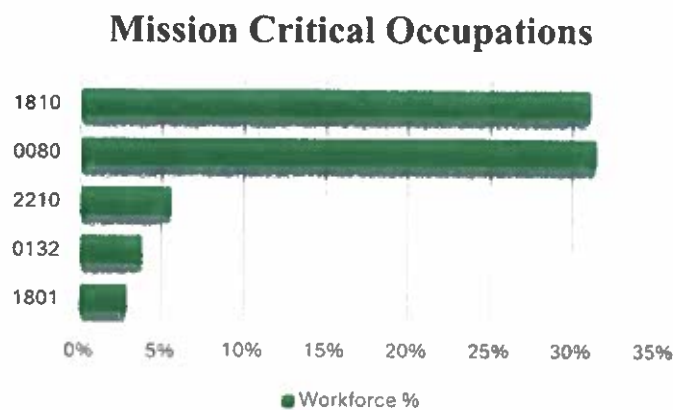
A significant shift occurs at the senior levels (GG-13 through GG-15 and SES). Despite women forming a majority (52.25%) of the total DCSA workforce, their representation, along with that of most minority groups, falls below Agency participation targets in these higher grades.

ERIC		Workforce Participation		GG-11	GG-12	GG-13	GG-14	Executive Senior Level	
		%	Count	%	%	%	%	GG-15	SES
<b>All</b>	Male	47.75%	2485	36.69%	44.60%	54.75%	58.06%	62.14%	73.68%
	Female	52.25%	2719	63.31%	55.40%	45.25%	41.94%	37.86%	26.32%
<b>Hispanic or Latino</b>	Male	3.65%	190	4.14%	3.39%	4.01%	4.12%	1.46%	2.63%
	Female	4.19%	218	7.10%	4.36%	3.87%	1.97%	.97%	2.63%

White	Male	32.80%	1707	19.53%	31.90%	37.51%	37.99%	48.54%	63.16%
	Female	30.92%	1609	31.95%	33.93%	26.32%	23.30%	23.79%	23.68%
Black or African American	Male	7.65%	398	10.36%	6.45%	8.80%	10.04%	7.77%	5.26%
	Female	13.82%	719	21.30%	14.15%	11.82%	12.90%	9.71%	.00%
Asian American	Male	2.73%	142	2.07%	2.18%	3.24%	4.48%	2.91%	.00%
	Female	2.23%	116	1.78%	1.89%	2.39%	2.33%	1.94%	.00%
Native Hawaiian or Other Pacific Islander	Male	.15%	8	.00%	.10%	.28%	.18%	.49%	.00%
	Female	.33%	17	.59%	.39%	.14%	.36%	.49%	.00%
American Indian or Alaska Native	Male	.42%	22	.00%	.34%	.42%	1.25%	.00%	2.63%
	Female	.33%	17	.30%	.34%	.42%	.18%	.49%	.00%
Two or More Races	Male	.35%	18	.59%	.24%	.49%	.00%	.97%	.00%
	Female	.44%	23	.30%	.34%	.28%	.90%	.49%	.00%

### 3. Mission Critical Occupations

DCSA's five most prevalent Mission Critical Occupation Series (MCOS) collectively account for 75.61% of all Agency positions. These include Security Administration (0080) at 31.82%, General Investigation (1810) at 29.53%, Information Technology Management (2210) at 7.32%, Intelligence (0132) at 4.02%, and General Inspection, Investigation, Enforcement, and Compliance (1801) at 2.92%. A review of the corresponding data in Tables A6, A7, and A9 reveal the following:



### **MCOS 0080**

The Security Administration series represents a significant portion of the DCSA workforce, with 1,656 employees (31.82%). The field is predominantly composed of females, 940 individuals, (56.76%), with most female employees serving at the GG-12 grade level, 462 members.

During FY 2025, hiring and promotion actions were conducted to fill vacancies. For internal competitive promotions, there were 10 vacancy announcements with 3 selections made from 181 qualified applicants, with 1 (33%) being female. For external hiring, there were 31 vacancy announcements with 36 candidates being selected from a pool of 1,108 qualified applicants, with 15 (41.67%) of the new hires being female.

### **MCOS 1810**

The General Investigation series includes 1,537 employees, representing 29.53% of the DCSA workforce. This occupation is closely balanced by gender (51.72% female, 48.28% male), with most employees serving at the GG-12 grade level, 1091 individuals.

During FY 2025, personnel actions were conducted to fill vacancies. For internal competitive promotions, there were seven vacancy announcements. Three selections were made from 39 qualified applicants, with one (33%) being female. For external hiring, there were 15 vacancy announcements, with one candidate being selected from a pool of 1,494 qualified applicants. The 1 new hire was a female candidate.

### **MCOS 2210**

The Information Technology and Cybersecurity series includes 381 employees, representing 7.32% of the DCSA workforce. This occupation is comprised of predominantly male employees, representing 71.65% of the population in this series, compared to 28.35% female employees in this population. Most employees in this series served at the GG-13 grade level. For the population of employees in this series who occupy a GG-13 pay grade, (i.e., 197 employees), 63 employees are female (i.e., 31.99% of the population in this series occupying a GG-13 pay grade).

During FY 2025, external only personnel actions were conducted to fill vacancies. Of the 40 vacancy announcements, 16 candidates were selected from a pool of 1,461 qualified applicants, and seven selected candidates, 43.75%, are female.

### **MCOS 0132**

The Intelligence Operations Specialist series occupation accounts for 4% of DCSA's workforce, with 209 employees. This field is predominantly male, at 72.73% compared to 27.27% female. During FY25, external only personnel actions were conducted to fill vacancies. Of the 12 external vacancy announcements, 10 candidates were selected from a pool of 589 qualified applicants, and 3 of these successful candidates are women (30%).

## MCOS 1801

The General Inspection, Investigation, Enforcement, and Compliance series occupation accounts for 2.92% of DCSA's workforce, with 152 employees. The occupation is gender-balanced (53.29% male compared to 46.71% female), with 92.10% of its employees serving at the GG-12 to GG-14 grade levels. In FY 2025, all personnel actions were external. Of the 9 external vacancy announcements, seven selections were made from a pool of 139 qualified applicants, and 3 of the applicant selectees are female (42.86).

## 5. Disability Workforce Trends

DCSA's commitment to not only hiring individuals with disabilities but also ensuring their success is reflected in the agency's FY 2025 performance. As detailed in Table B1, the agency exceeded the federal goal for Persons with Disabilities (PWDs) and met the goal for Person with Targeted Disabilities (PWTDs).

Table B1

		FY 2025	Federal Goal	+/-
Federal Workforce	%	12.64%	12%	0.64%
Targeted Disabilities	%	2.00%	2%	0.00%

Part J of this report provides additional disability workforce trends.

## EEO Complaints

DCSA upholds a foundational commitment to all EEO laws and regulations, measuring the agency's program success against the six essential elements of MD-715. DCSA's goal is to ensure every employee and applicant is afforded equal opportunity, free from discrimination or reprisal.

In Fiscal Year (FY) 2025, DCSA executed a proactive strategy to enhance its EEO Program, focusing on barrier removal, system modernization, and early conflict resolution. The Office of EEO, in collaboration with agency partners, conducted training on workplace civility and effective communication, and performed virtual and in-person site visits to promote a healthy and respectful culture.

A cornerstone of DCSA's modernization effort is the successful pilot of a new automated EEO complaints management tool on the ServiceNow platform. This interactive system provides real-time case tracking and powerful analytics, significantly improving the efficiency of EEO processing and reporting, including the generation of the annual EEOC 462 Report.

These system enhancements support a strong record of performance. The Agency achieved a **90% timeliness rate for Final Agency Decisions (FADs)**, averaging just over 60 days for issuance, and a **92% timeliness rate for merit-based final actions**. Critically, despite departmental challenges, DCSA maintained a **100% timeliness rate for issuing initial notices to complainants**.

Analysis of FY 2025 complaint data revealed that the most frequently cited bases of discrimination are disability (88%), reprisal (83%), and age (46%), with the top issues being harassment, RA, and disciplinary actions. While DCSA launched a campaign to promote ADR as a key tool for early resolution, the offer rate remained under 20%, highlighting a key area for future focus.

Building on these insights, our **primary goal for FY 2026 is to increase the use of ADR to resolve disputes before they become formal complaints.** Through targeted training for leaders and employees, DCSA aims to **reduce formal EEO complaints by 10% across the enterprise.** This investment will foster a more harmonious and trusted workforce, strengthening our ability to meet the national security challenges of the 21st century.

## **Accomplishments**

DCSA provides the following highlights of accomplishments for FY 2025.

### **A. Recruitment and Outreach Efforts:**

DCSA proactively implemented targeted recruitment strategies to attract qualified disabled veteran candidates, particularly those with a disability rating of 30% or more. Key efforts included forming strategic partnerships with the Department of Veterans Affairs Vocational Rehabilitation and Employment (VRE) and the Wounded Warrior Project (WWP). In FY2025, these initiatives were expanded to include presence on veteran-focused job boards, including "Hiring Our Heroes" at military installations, and participation in veteran-specific and college career fairs across the United States, sharing experiences with numerous other Federal agencies. Furthermore, DCSA utilized social media platforms such as LinkedIn and Facebook for targeted advertising campaigns that promoted the agency as an employer of choice for the veteran community and others interested in mission-oriented fields pertaining to counterintelligence, cybersecurity, and investigations.

### **B. Accessible Hiring Processes:**

DCSA is committed to improving accessibility during its application and hiring process to ensure qualified candidates, particularly those with disabilities, receive clear guidance and prompt responses from hiring officials and that those officials engage in strategic coordination with the OEEO regarding any requests for reasonable accommodation as required by law. The Agency conducts regular accessibility audits to identify and address potential barriers in the recruitment and hiring process, ensuring all job announcements on USA Jobs are Section 508 compliant. Additionally, HCMO rigorously adheres to Veterans' Preference laws and regulations. DCSA-HCMO representatives routinely review job descriptions to ensure they accurately reflect the essential functions of all positions and do not inadvertently screen out qualified individuals with disabilities. The Agency also ensures interview panels are trained to conduct fair, merit-based interviews and provides members serving on those panels with guidance on how to properly address any disability-related questions that may arise.

### **C. Enhanced Reasonable Accommodation (RA) Program**

In FY 2025, DCSA processed over 442 RA requests, which reflected a significant increase from prior years. To effectively manage this voluminous amount of RA requests, DCSA's OEEO successfully transitioned the RA program to Entellitrak, in 2021, a centralized case management system for real-time tracking, prompt reporting, and efficient processing. This centralized approach, which included a partnership with the Safety & Occupational Health office for expert-led ergonomic assessments, effectively removed barriers and increased support for individuals with disabilities. To fulfill these accommodation requests and comply with requirements, DCSA utilized approximately \$21,000 for equipment purchases and an additional \$7,936 through the Computer/Electronic Accommodations Program (CAP). Furthermore, the Agency continued its commitment to accessibility by providing American Sign Language (ASL) services, which were used during 26 Agency-wide events, 39 other occasions to support hearing-impaired employees, and for numerous mission-critical background investigation interviews.

### **D. Strengthened EEO Strategy, Training, & Communication**

OEEO consistently engages with senior leadership by providing comprehensive bi-annual reviews of EEO data, including the State of the Agency briefing. DCSA's Accountability Council and component directors are also briefed on information from key reports submitted to the EEOC and OPM, such as the MD-715, DVAAP, FEORP, and Form 462.

This commitment was reinforced with (1) the expansion of the Agency's EEO and leadership development training offerings across the organization; (2) updates to EEO policies in alignment with administration and DoW guidance; and (3) reinforcement of leadership commitment through the annual EEO Policy Statement.

To ensure broad communication, the Agency equipped employees with knowledge through newsletters, the intranet, lunch and learn sessions, chaplain-organized events, and town halls, and the Agency encouraged employee performance and recognition through the GREAT awards program.

### **E. Integrated EEO into the Employee Lifecycle and Training**

In Fiscal Year 2025, HCMO welcomed 390 new hires to DCSA through its bi-weekly New Employee Experience (NEX) onboarding sessions. More than 120 newly appointed supervisors received bi-monthly training covering dedicated topics such as EEO and RA procedures. Through a collaborative effort with the OEEO, these sessions feature critical EEO information (EEO Complaint Process, Anti-Harassment, and RA trainings) that comply with Presidential EOs.

At the very beginning of Agency employment, new hires are introduced to foundational EEO principles, the complaint process, the ADR Program, and Harassment Prevention. This prioritization of EEO topics, from the very onset of a new employee's experience at the agency, ensures that all new personnel understand the Agency's commitment to ensuring the workplace is free from unlawful discrimination and harassment and are fully

aware of the processes and programs that support these imperatives. EEO manages these training courses using a variety of educational approaches that include, but are not limited to, interactive presentations and focus groups throughout the year. This comprehensive strategy equips all employees with the necessary tools to drive change and ensures the agency's culture remains aligned with DCSA and DoW goals.

#### **F. Ensured Physical and Environmental Accessibility**

To ensure full compliance with accessibility standards, DCSA routinely conducts comprehensive Architectural Barriers Studies and Accessibility reviews of its facilities and common areas across the enterprise. These efforts led to the successful closure of previously identified deficiencies and the implementation of required improvements. Key enhancements include the upgrade of common spaces and the creation of new lactation space and wellness areas, promoting a more accessible and supportive environment for all personnel.

### **Conclusion**

DCSA is dedicated to fostering a workforce that benefits from the unique skills, experience, and dedication of all its employees. This commitment produced noteworthy progress, throughout FY2025, in the representation of disabled employees, including veterans, across the enterprise and specifically within mission-critical occupations. To achieve objective and to stimulate such progress, DCSA implemented and continues to utilize a multi-faceted approach focused on proactive recruitment, outreach, accessible hiring processes, and robust retention programs while also being committed to identifying and eliminating any barriers that potentially impede equal opportunity. The OEEO, in consultation with HCMO and DCSA-GC, continues to provide oversight and ensure accountability for equal opportunity. The findings from this reporting period will guide DCSA's efforts in FY 2026 and beyond as the Agency remains dedicated to illuminating risk to American resilience and innovation, cultivating a fair, results-oriented business, and a high-performing workforce that reflects the nation DCSA serves.

# EEOC Form 715-01 - US Equal Opportunity Commission Part F - Federal Agency EEO Program Status Report

## CERTIFICATION of ESTABLISHMENT of CONTINUING EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS

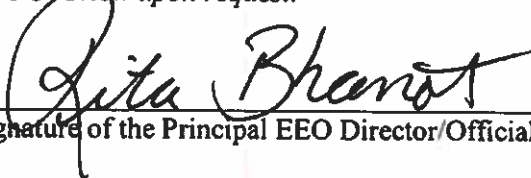
I, Ms. Rita Bhanot, am the principal EEO Director/Official for

Defense Counterintelligence and Security Agency (DCSA)

The agency has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEOC MD-715. If an essential element was not fully compliant with the standards of EEOC MD-715, a further evaluation was conducted and as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program are included with this Federal Agency Annual EEO Program Status Report.

The agency has also analyzed its work force 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, sex 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.*

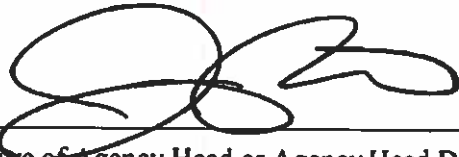


Signature of the Principal EEO Director/Official

5/15/2026

Date

*Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEOC MD-715.*











Signature of Agency Head or Agency Head Designee



6 May 2026





Date

## Part G: Agency Self-Assessment Checklist Measuring Essential Elements

 Compliance Indicator  Measures	<b>A.1 – The agency issues an effective, up to date EEO policy statement.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
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.	NO	The 2025 EEO Policy Statement was issued in July 2025; however, it was determined that the policy did not fully comply with EEOC guidance and relevant regulatory guidance as further described below. As set forth in 29 CFR § 1614.101(a), "It is the policy of the Government of the United States to provide equal opportunity in employment for all persons, to prohibit discrimination in employment because of race; color; religion; sex; national origin; age; disability; genetic information; <i>or pregnancy, childbirth, or related medical conditions</i> ; and to promote the full realization of equal employment opportunity through a continuing affirmative program in each agency." The July 2025 EEO Policy Statement was missing language adequately addressing the bold font text. A new policy statement that is reflective of EEOC guidance was signed, issued, and made readily available to the workforce on or about April 17, 2026.
A.1.b	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, and genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces?	NO	A new policy that is reflective of EEOC's guidance and Part 1614 of Title 29 of the Code of Federal Regulations was signed, issued, and made readily available to the workforce on or about on April 17, 2026.
 Compliance Indicator  Measures	<b>A.2 – The agency has communicated EEO policies and procedures to all employees.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
A.2.a	Does the agency disseminate the following policies and procedures to all employees?	YES	NEX training (new employees); Annual EEO training; OEEO SharePoint site; <a href="#">DCSA policy Component.aspx</a> .
A.2.a.1	Anti-harassment policy?	YES	DCSA Instruction 08-14, "Workplace Harassment Prevention and Response," April 26, 2023.
A.2.a.2	Reasonable accommodation procedures?	YES	DCSA Instruction 08-12, "Reasonable Accommodation Program," January 12, 2022.

A.2.b	Does the agency prominently post the following information throughout the workplace and on its public website?	YES	<a href="https://dod365.sharepoint-mil.us/sites/DCSA-Hub/SitePages/Home.aspx">https://dod365.sharepoint-mil.us/sites/DCSA-Hub/SitePages/Home.aspx</a>
A.2.b.1	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director?	YES	<a href="https://www.dcsa.mil/Contact-Us/Office-of-Equal-Employment-Opportunity-OEEO">https://www.dcsa.mil/Contact-Us/Office-of-Equal-Employment-Opportunity-OEEO</a> .
A.2.b.2	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process?	YES	<a href="https://www.dcsa.mil/Contact-Us/Office-of-Equal-Employment-Opportunity-OEEO">https://www.dcsa.mil/Contact-Us/Office-of-Equal-Employment-Opportunity-OEEO</a> .
A.2.b.3	Reasonable accommodation procedures? If so, please provide the internet address in the comment column.	YES	<a href="https://dod365.sharepoint-mil.us/sites/DCSA-EPP/Library/Forms/Component.aspx">https://dod365.sharepoint-mil.us/sites/DCSA-EPP/Library/Forms/Component.aspx</a> <a href="https://www.dcsa.mil/EEO/regulation/">https://www.dcsa.mil/EEO/regulation/</a>
A.2.c	Does the agency inform its employees about the following topics:		
A.2.c.1	EEO complaint process? If "yes", please provide how often.	YES	Monthly New employee orientation (NEX), periodic Lunch & Learn sessions, new supervisors course, and by request.
A.2.c.2	ADR process? If "yes", please provide how often.	YES	Monthly during the new employee orientation (NEX); periodic Lunch & Learn session, and by request.
A.2.c.3	Reasonable accommodation program? If "yes", please provide how often.	YES	Monthly during the new employee orientation (NEX); periodic Lunch & Learn sessions, new supervisors course, and by request.
A.2.c.4	Anti-harassment program? If "yes", please provide how often.	YES	Monthly during the new employee orientation (NEX); periodic Lunch & Learn sessions, and by request.
A.2.c.5	Behaviors that are inappropriate in the workplace and could result in disciplinary action? If "yes", please provide how often.	YES	Monthly during the new employee orientation, and new supervisors course.
 Compliance Indicator  Measures	<b>A.3 – The agency assesses and ensures EEO principles are part of its culture.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
A.3.a	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? If "yes", provide one or two examples in the comments section.	N/A	
A.3.b	Does the agency utilize the Federal Employee Viewpoint Survey (FEVS) or other climate assessment tools to monitor the perception of EEO principles within the workforce?	N/A	In FY25, the Federal Employee Viewpoint Survey was suspended.
 Compliance Indicator  Measures	<b>B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
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?	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?	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?	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? If "yes", please provide the date of the briefing in the comment's column.	YES	September 2025
B.1.d	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues?	YES	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.2 – The EEO Director controls all aspects of the EEO program.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
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?	YES	
B.2.b	Is the EEO Director responsible for overseeing the completion of EEO counseling?	YES	
B.2.c	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [This question may not be applicable for certain subordinate level components.]	YES	
B.2.d	Is the EEO Director responsible for overseeing the timely issuing final agency decisions (FADs)?	YES	
B.2.e	Is the EEO Director responsible for ensuring compliance with EEOC orders?	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?	YES	
B.2.g	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components?	N/A	

 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
<b>B.3.a</b>	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities?	YES	The EEO office partners with the training office Leadership Development Program.
<b>B.3.b</b>	Does the agency's current strategic plan reference EEO diversity and inclusion principles? If "yes", please identify the EEO principles in the strategic plan in the comments column.	YES	"We believe accountability is fundamental to our organization and have a zero-tolerance policy for retaliation and behaviors not aligned to our values, promptly addressing or reporting behaviors that don't align with our desired culture. We promote equal treatment and ensure our actions are perceived as fair by those around us" as cited in DCSA Strategic Plan 2025-2030. Executive Order (EO) 14173 dated January 21, 2025, disbanded Diversity, Equity, Inclusion, and Accountability (DEIA).
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
<b>B.4.a</b>	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:	YES	
<b>B.4.a.1</b>	To conduct a self-assessment of the agency for possible program deficiencies?	YES	
<b>B.4.a.2</b>	To enable the agency to conduct a thorough barrier analysis of its workforce?	YES	
<b>B.4.a.3</b>	To timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions (FADs), and legal sufficiency reviews?	YES	
<b>B.4.a.4</b>	To provide <u>all supervisors</u> 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? If not, please identify the type(s) of training with insufficient funding in the comment's column.	YES	
<b>B.4.a.5</b>	To conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable?	YES	
<b>B.4.a.6</b>	To publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)?	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? 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)?	N/A	All special emphasis programs and employee resource groups have been suspended in compliance with current administration EOs.
B.4.a.9	To effectively manage its anti-harassment program?	NO	DCSA lacks an Anti-Harassment Program manager; the Anti-Harassment Program is organized within the HCMO, Employee Relations, with limited resources. The program requirements are satisfied using existing resources.
B.4.a.10	To effectively manage its reasonable accommodation program?	YES	
B.4.a.11	To ensure timely and complete compliance with EEOC orders?	YES	
B.4.b	Does the EEO office have a budget that is separate from other offices within the agency?	YES	
B.4.c	Are the duties and responsibilities of EEO officials clearly defined?	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	
<b>→ Compliance Indicator</b> <b>↓ Measures</b>	<b>B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
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:	YES	
B.5.a.1	EEO Complaint Process?	YES	
B.5.a.2	Reasonable Accommodation Procedures?	YES	
B.5.a.3	Anti-Harassment Policy?	YES	
B.5.a.4	Supervisory, managerial, communication, and interpersonal skills to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications?	YES	

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.	YES	
<b>→</b> <b>Compliance Indicator</b> <b>↓</b> <b>Measures</b>	<b>B.6 – The agency involves managers in the implementation of its EEO program.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
B.6.a	Are senior managers involved in the implementation of Special Emphasis Programs?	N/A	All special emphasis programs and employee resource groups have been suspended in compliance with current administration guidance and Presidential EO 14173, dated January 21, 2025.
B.6.b	Do senior managers participate in the barrier analysis process?	N/A	
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)?	N/A	
B.6.d	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans?	NO	OEEEO identifies this as a deficiency that requires further analysis. As detailed in Part H, OEEEO is launching a new strategic plan to support and advance the Agency's current strategy.
<b>→</b> <b>Compliance Indicator</b> <b>↓</b> <b>Measures</b>	<b>C.1 – The agency conducts regular internal audits of its component and field offices.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
C.1.a	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? If "yes", please provide the schedule for conducting audits in the comments section.	YES	Regional Offices (Field) are assessed quarterly and by request for EEO Program deficiencies.
C.1.b	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? If "yes", please provide the schedule for conducting audits in the comments section.	YES	Regional Offices (Field) are assessed quarterly and by request to remove barriers to EEO.
C.1.c	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit?	YES	
<b>→</b> <b>Compliance Indicator</b> <b>↓</b> <b>Measures</b>	<b>C.2 – The agency has established procedures to prevent all forms of EEO discrimination.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
C.2.a	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance?	NO	DCSA is updating Instruction 08-14, "Workplace Harassment Prevention and Response," April 26, 2023, to comply with EEOC TA letter dated December 18, 2025.
C.2.a.1	Does the anti-harassment policy require corrective action to prevent or eliminate	YES	See DCSA Instruction 08-14, "Workplace Harassment Prevention and Response,"







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	conduct before it rises to the level of unlawful harassment?		April 26, 2023, para. 1.2(b); 4.1(b).
C.2.a.2	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director?	YES	Anti-Harassment Coordinator resides within HCMO.
C.2.a.3	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations?	YES	See DCSA Instruction 08-14, "Workplace Harassment Prevention and Response," April 26, 2023, para. 4.1(a)(2).
C.2.a.4	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment?	YES	The OEEO has an established process that triggers establishing communication between the offices.
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? If "no", please provide the percentage of timely-processed inquiries in the comment column.	NO	96% of harassment complaint inquiries (23 out of 24) were initiated within the required 10-day period.
C.2.a.6	Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment?	NO	No training slide or materials exist related to disability-based harassment within DCSA's policy training slide. The facilitator, however, discusses disability as one of the bases protected under Title VII.
C.2.b	Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance?	NO	The current RA Instruction does not expressly include pregnancy, childbirth, or related medical conditions.
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?	YES	OEEO has a Disability Program Manager and a team that processes requests.
C.2.b.2	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director?	YES	DCSA Instruction 08-12, "Reasonable Accommodation Program," January 12, 2022, para. 2.3(c).
C.2.b.3	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes?	YES	DCSA Instruction 08-12, "Reasonable Accommodation Program," January 12, 2022, para. 2.6(a).
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?	YES	DCSA Instruction 08-12, "Reasonable Accommodation Program," January 12, 2022, para. 4.1(a)(3).
C.2.b.5	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? If "no", please provide the percentage of timely-processed requests in the comment column.	NO	A significant influx of telework requests, following the Presidential return-to-office memorandum, caused significant processing delays in FY25, resulting in only 37% of RA cases being processed on time.
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?	YES	<a href="https://www.dcsa.mil/Contact-Us/Office-of-Equal-Employment-Opportunity-OEEO/EEO-Regulation-Laws-Executive-Order">https://www.dcsa.mil/Contact-Us/Office-of-Equal-Employment-Opportunity-OEEO/EEO-Regulation-Laws-Executive-Order</a> .
C.2.c.1	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? If "yes", please	YES	The PAS procedures are included in the Reasonable Accommodation Instruction. The instruction is posted on the public

	provide the internet address in the comment column.		website at <a href="https://www.dcsa.mil/Contact-Us/Office-of-Equal-Employment-Opportunity-OEEO/EEO-Regulation-Laws-Executive-Order">https://www.dcsa.mil/Contact-Us/Office-of-Equal-Employment-Opportunity-OEEO/EEO-Regulation-Laws-Executive-Order</a> .
<b>→</b> <b>Compliance Indicator</b> <b>↓</b> <b>Measures</b>	<b>C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
<b>C.3.a</b>	Pursuant to 29 CFR §1614.102(a) (5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	YES	All graded (GG) supervisors are evaluated based on the DCIPS behaviors listed below, which are included in each supervisor FY26 Performance Plan. In FY25, all of the behaviors, except Holding Employees Accountable, were included in the Performance Plans of GG supervisors.
<b>C.3.b</b>	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities?	YES	
<b>C.3.b.1</b>	Resolve EEO problems/disagreements/ conflicts, including the participation in ADR proceedings?	YES	
<b>C.3.b.2</b>	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators?	YES	Agencies and complainants each have a duty to cooperate with the investigator during the investigation. See 29 C.F.R. § 1614.108(c)(1). Pursuant to 29 C.F.R. § 1614.108(c)(3), a party to a complaint, whether the complainant or the agency, may be subject to sanctions where that party fails without good cause shown to respond fully and in a timely fashion to a request of the investigator for documents, records, comparative data, statistics, affidavits, or the participation/attendance of witnesses.
<b>C.3.b.3</b>	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation?	YES	<a href="https://www.dcsa.mil/Contact-Us/Office-of-Equal-Employment-Opportunity-OEEO/EEO-Regulation-Laws-Executive-Order">https://www.dcsa.mil/Contact-Us/Office-of-Equal-Employment-Opportunity-OEEO/EEO-Regulation-Laws-Executive-Order</a> .
<b>C.3.b.4</b>	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees?	YES	
<b>C.3.b.5</b>	Provide religious accommodations when such accommodations do not cause an undue hardship?	YES	In FY25, DCSA received and approved five requests for RA.
<b>C.3.b.6</b>	Provide disability accommodations when such accommodations do not cause an undue hardship?	YES	
<b>C.3.b.7</b>	Support the EEO program in identifying and removing barriers to equal opportunity?	YES	
<b>C.3.b.8</b>	Support the anti-harassment program in investigating and correcting harassing conduct?	YES	

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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?	YES	
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?	YES	The OEEO representatives met monthly with the Agency head or designee to provide recommendations related to EEO matters.
C.3.d	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency?	YES	
<b>Compliance Indicator</b> <b>Measures</b>	<b>C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
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?	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?	YES	
C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables?	YES	
C.4.d	Does the HR office timely provide the EEO office with timely access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request?	YES	
C.4.e	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:		
C.4.e.1	Implement the Affirmative Action Plan for Individuals with Disabilities?	YES	
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives?	YES	
C.4.e.3	Develop and/or provide training for managers and employees?	YES	
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace?	YES	
C.4.e.5	Assist in preparing the MD-715 report?	YES	

 Compliance Indicator  Measures	<b>C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
C.5.a	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct?	NO	DCSA follows DODI 1400.25, and DCSA is currently developing an Agency wide Disciplinary policy and Table of Penalties.
C.5.b	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	YES	DCSA uses the OPM Table of Penalties as guidance; there were no findings of discrimination during FY25.
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?	YES	
 Compliance Indicator  Measures	<b>C.6 – The EEO office advises managers/supervisors on EEO matters.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
C.6.a	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? If “yes”, please identify the frequency of the EEO updates in the comment column.	YES	<p>The State of EEO is briefed annually to senior officials and posted to the Agency's internal website.</p> <p>Monthly updates are provided to senior agency leaders, including to the Chief of Staff (bi-monthly), regarding complaints, workforce demographics, data summaries, legal updates and barrier analysis. Special Emphasis Programs were discontinued effective January 21, 2025, in compliance with a Presidential E.O.</p>
C.6.b	Are EEO officials readily available to answer managers' and supervisors' questions or concerns?	YES	
 Compliance Indicator  Measures	<b>D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
D.1.a	Does the agency have a process for identifying triggers in the workplace?	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?	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?	YES	DCSA conducts an Exit Survey that includes questions in alignment with OUSW (I&S) instruction and IC Exit Survey questions. The Exit Survey does not directly ask questions about individuals with disabilities; it offers general questions about topics such as opportunities for promotion, availability of developmental opportunities, supervision, leadership, recognition, work-life programs, etc. Respondents possess the opportunity to provide feedback about any topic through the open-ended question: "Is there any additional information that you would like to share about why you decided to leave your Agency? " In the survey, an option also exists for a person to request to speak to someone about the employee's answers to the survey.
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers?	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?	YES	The Agency complies with all EOs and DoW, EEOC, and OPM guidance.
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?	YES	The Agency announces to all employees, without regard to protected status, any HR or organizational realignments. The Agency also complies with all EOs and DoW, EEOC, and OPM guidance.
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? If "yes", please identify the data sources in the comments column.	YES	NOTE: All special emphasis programs and employee resource groups have been suspended in compliance with current administration executive orders and DoW guidance. However, EEO training and component focus group sessions are offered upon request; in addition, the OEEEO team reviews complaints, RA, and No FEAR Reports data to determine if there are barriers in the workplace.
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.3 – The agency establishes appropriate action plans to remove identified barriers.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>

D.3.a.	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices?	YES	In FY25, DoW established an EEO Directors Task Force to reform EEO Complaints Processing and Reasonable Accommodation Procedures. This effort is still ongoing and is expected to continue throughout FY26.
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?	N/A	
D.3.c	Does the agency periodically review the effectiveness of the plans?	YES	
<b>Compliance Indicator</b> ↓ <b>Measures</b>	<b>D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
D.4.a	Does the agency post its affirmative action plan on its public website? Please provide the internet address in the comments.	YES	<a href="https://www.dcsa.mil/Contact-Us/Office-of-Equal-Employment-Opportunity-OEEO/EEO-Regulation-Laws-Executive-Order/">https://www.dcsa.mil/Contact-Us/Office-of-Equal-Employment-Opportunity-OEEO/EEO-Regulation-Laws-Executive-Order/</a>
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?	YES	The Agency takes steps to ensure all qualified persons, including those with disabilities, are aware of and encouraged to apply for specific job vacancies.
D.4.c	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly?	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?	YES	The Agency takes steps (e.g., partnership with the Wounded Warrior Project) to increase the number of all qualified persons, including individuals with disabilities, to achieve the EEOC and Federal goals.
<b>Compliance Indicator</b> ↓ <b>Measures</b>	<b>E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	NO	There was one EEO counseling that exceeded the 90 days processing timeframe.
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	
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	Average processing time is 10-20 days.

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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?	NO	As reported on DCSA FY25 462 report to the EEOC, there were two untimely investigations. Nine of 11 cases were timely investigated in FY25.
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 (FAD), pursuant to 29 CFR §1614.110(b)?	NO	One of the 11 Final Agency Decisions (FADs) issued during FY 2025 was untimely (84 days), resulting in a 9% untimeliness rate.
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? If "yes", please describe how in the comment column.	YES	The EEO Complaints Manager meets monthly with the COR and contracting agent (program manager), or as otherwise needed, to ensure quality deliverables IAW the Performance Work Statement (PWS).
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?	YES	
E.1.l	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)?	YES	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.2 – The agency has a neutral EEO process.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
E.2.a	Has the agency established a clear separation between its EEO complaint program and its defensive function? If "yes", please explain.	YES	The Office of EEO complies with MD-110 for EEO complaint processing through a firewall between the EEO function and the Agency's defensive function. To ensure there is no perception of undue influence, agency legal counsel may participate in the pre-complaint and investigative stages under clearly defined and controlled conditions that permit execution of the Agency Director's obligation to defend the Agency against legal challenges while avoiding

			inappropriate interference with the activities of DCSA-OEEO. For instance, any attorney who advises upon EEO function will not also deliver support related to the defensive function, and agency legal counsel [for defense purposes] typically is not integrated into the EEO complaint process until a case is docketed before the EEOC.
E.2.b	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? If "yes," please identify the source/location of the attorney who conducts the legal sufficiency review in the comment column.	YES	The DCSA-GC appoints attorneys to specifically support the EEO function, including performance of legal sufficiency reviews, as needed. Those assigned attorneys will not support any defensive function. Additionally, a contracted vendor routinely offers legal support pertaining to evaluation of all final agency decisions.
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?	YES	
E.2.d	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions?	YES	
E.2.e	If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? EEOC Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004)	YES	
<b>→ Compliance Indicator</b> <b>↓ Measures</b>	<b>E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
E.3.a	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process?	YES	
E.3.b	Does the agency require managers and supervisors to participate in ADR once it has been offered?	NO	Revised policy strongly encourages participation – however, managers and supervisors are not "required" to participate.
E.3.c	Does the agency encourage all employees to use ADR, where ADR is appropriate?	YES	
E.3.d	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process?	YES	
E.3.e	Does the agency prohibit the responsible management official named in the dispute from having settlement authority?	YES	
E.3.f	Does the agency annually evaluate the effectiveness of its ADR program?	YES	

 Compliance Indicator  Measures	<b>E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.</b>	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?	YES	
E.4.a.2	The race, national origin, sex, and disability status of agency employees?	YES	
E.4.a.3	Recruitment activities?	YES	
E.4.a.4	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status?	YES	
E.4.a.5	The processing of requests for reasonable accommodation?	YES	
E.4.a.6	The processing of complaints for the anti-harassment program?	YES	
E.4.b	Does the agency have a system in place to re-survey the workforce on a regular basis?	YES	
 Compliance Indicator  Measures	<b>E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.</b>	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? If "yes", provide an example in the comments.	YES	DCSA conducts analysis of higher-level positions (grades 13, 14, 15, and SES). All selections are merit-based and in compliance with DoW and EOs.
E.5.b	Does the agency review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? If "yes", provide an example in the comments.	YES	DCSA modeled NASA religious accommodation training; the agency outsourced final agency decision writing and investigative services as a best practice.
E.5.c	Does the agency compare its performance in the EEO process to other federal agencies of similar size?	YES	DoW provides end of year roll up of No FEAR Reports in an effort to compare performance across the department.
 Compliance Indicator  Measures	<b>F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.</b>	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?	YES	
F.1.b	Does the agency have a system of management controls to ensure the timely, accurate, and	YES	

	complete compliance with resolutions/settlement agreements?		
F.1.c	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief?	YES	
F.1.d	Are procedures in place to process other forms of ordered relief promptly?	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?	YES	
<b>→</b> Compliance Indicator <b>↓</b> Measures	<b>F.2 - The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
F.2.a	Does the agency timely respond and fully comply with EEOC orders?	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?	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?	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?	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	
<b>→</b> Compliance Indicator <b>↓</b> Measures	<b>F.3 - The agency reports to EEOC its program efforts and accomplishments.</b>	<b>Measure Met (Yes/No/N/A)</b>	<b>Comments</b>
F.3.a	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report?	YES	
F.3.b	Does the agency timely post on its public webpage its quarterly No FEAR Act data?	YES	

## Part H: EEO Plan for Attaining the Elements for 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
A.1.a Demonstrated Commitment by Agency Leadership	The Agency's annual policy statement, signed on July 14, 2025, did not include the protected basis pregnancy, childbirth, or related medical conditions.

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

Date Initiated (mm/dd/yy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
12/18/2025	Update EEO Policy Statement to reflect all EEO protected bases to include pregnancy, childbirth, or related medical conditions.	01/06/2026		04/17/2026

### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
OEEC Director	Rita Bhanot	Yes

**Planned Activities Toward Completion of Objective**

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing? (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
05/30/2026	Submit updated FY 2026 EEO Policy Statement for Acting Director's signature.	Yes		04/17/2026

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
2026	Agency EEO Policy Statement signed by the Acting Director on April 17, 2026.

**Statement of Model Program Essential Element Deficiency**

<b>Type of Program Deficiency</b>	<b>Brief Description of Program Deficiency</b>
A.1.b Demonstrated Commitment by Agency Leadership	The FY 2025 annual EEO Policy Statement does not accurately reflect all protected EEO basis.

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

<b>Date Initiated (mm/dd/yy yy)</b>	<b>Objective</b>	<b>Target Date (mm/dd/yyy y)</b>	<b>Modifie d Date (mm/d d/yyyy)</b>	<b>Date Comple d (mm/dd/y yyy)</b>
12/18/2025	Update annual EEO Policy Statement to accurately reflect all EEO protected bases to include pregnancy, childbirth, or related medical condition.	01/06/2026		04/17/2026

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan?  (Yes or No)
OEEO Director	Rita Bhanot	Yes

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing?  (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
06/30/2026	Submit updated FY 2026 EEO Policy Statement for Acting Director's signature.	Yes		04/17/2026

**Report of Accomplishments**

Fiscal Year	Accomplishments
2026	DCSA EEO Policy Statement has been updated to reflect all protected EEO bases. The Acting Director signed the EEO Policy Statement in FY26.

**Statement of Model Program Essential Element Deficiency**

Type of Program Deficiency	Brief Description of Program Deficiency
B.4.a.9 Integration of EEO into the Agency's Strategic Mission	The Agency specifically lacks a dedicated Anti-Harassment program manager to effectively manage its Anti-Harassment Program. DCSA will recruit an Anti-Harassment program manager when funding is available. In the interim, responsibilities will be satisfied with existing resources.

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

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
02/1/2025	Employee Relations Chief to establish an Anti-Harassment program manager and Branch.	09/30/2026		

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
HCMO Director	Richard M. Rennolds	Yes
Employee Relations Chief	Deana D. Rasnick	Yes

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2026	Establish an Anti-Harassment program manager position within Employee Relations in an effort to comply with EEOC identified best practices.	No		

### Report of Accomplishments

Fiscal Year	Accomplishments

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
B.6.d Integration of EEO into the Agency's Strategic Mission	OEEO lacks an updated OEEO Strategic Plan that aligns with the Agency's Strategic Plan for senior managers to successfully implement EEO Action Plans.

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

Date Initiated (mm/dd/yy yy)	Objective	Target Date (mm/dd/yy yy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/08/2025	Create an OEEO Strategic Plan that aligns to the Agency's Strategic Plan for senior managers to implement EEO Action Plan objectives.	09/30/2026		

### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
OEEO Director	Rita Bhanot	Yes
Deputy Director OEEO	Mohammed B. Kabir	Yes

**Planned Activities Toward Completion of Objective**

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing?  (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
08/30/2026	The OEEO is in collaboration with an external vendor who is developing an OEEO Strategic Plan based on an OEEO offsite held in 2025.	Yes		
09/30/2026	OEEO leaders will draft action plan objectives to align with Agency Strategic Plan 2025-2030.	Yes		

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
2025	Held an OEEO off-site to discuss vision, roles, and goals for each program area.

**Statement of Model Program Essential Element Deficiency**

<b>Type of Program Deficiency</b>	<b>Brief Description of Program Deficiency</b>
C.2.a Management and Program Accountability	The Agency's Anti-Harassment policy and procedures do not comply with EEOC's enforcement guidance.

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

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
12/18/2026	Update Instruction 08-14 Workplace Harassment Prevention and Response to comply with listing all protected EEO bases.	06/30/2026		

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
OEEO Director	Rita Bhanot	Yes

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
06/30/2026	Update Agency's Workplace Harassment Instruction to include pregnancy, childbirth, or related medical conditions.	Yes		

**Report of Accomplishments**

Fiscal Year	Accomplishments

**Statement of Model Program Essential Element Deficiency**

Type of Program Deficiency	Brief Description of Program Deficiency
C.2.a.5 Management and Program Accountability	96% of harassment complaint inquiries (23 out of 24) were initiated within the required 10-day period.

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

Date Initiated (mm/dd/yy)	Objective	Target Date (mm/dd/yy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
04/14/2026	To achieve 100% timely processing of harassment complaints within the 10-day timeframe.	09/30/2026		

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan?(Yes or No)
HCMO/Employee Relations Division	Deana D. Rasnick	Yes

**Planned Activities Toward Completion of Objective**

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing?  (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
09/30/2016	Continue to monitor harassment cases assigned to management officials and internally collaborate with agency stakeholders to ensure timely processing. Request full-time employee and staff to perform the work required for successful Anti-Harassment Program.	No		

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>

**Statement of Model Program Essential Element Deficiency**

<b>Type of Program Deficiency</b>	<b>Brief Description of Program Deficiency</b>
C.2.a.6	No training slide or material exists regarding disability-based harassment within DCSA training materials. The training facilitator does discuss disability as one of the protected bases under Title VII.

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

<b>Date Initiated (mm/dd/yy)</b>	<b>Objective</b>	<b>Target Date (mm/dd/yy)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Date Completed (mm/dd/yyyy)</b>
04/16/2026	To modify Anti-Harassment training slides to incorporate disability based harassment materials.	09/30/2026		

**Responsible Official(s)**

<b>Title</b>	<b>Name</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>
Disability Program Manager	Lorraine A. Lupo	Yes

**Planned Activities Toward Completion of Objective**

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing? (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
09/30/2026	The OEEO is in collaboration with the HCMO training division to revise the current slide deck on Anti-Harassment policy.	Yes		

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>

**Statement of Model Program Essential Element Deficiency**

<b>Type of Program Deficiency</b>	<b>Brief Description of Program Deficiency</b>
C.2.b Management and Program Accountability	The Agency has not established disability reasonable accommodation procedures that align with EEOC's regulations and guidance.

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

<b>Date Initiated (mm/dd/yyyy)</b>	<b>Objective</b>	<b>Target Date (mm/dd/yyyy)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Date Completed (mm/dd/yyyy)</b>
08/20/2025	Update RA Instruction to include the protected basis pregnancy, childbirth, or other related medical conditions.	09/30/2026		

**Responsible Official(s)**

<b>Title</b>	<b>Name</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>
OEEEO Director	Rita Bhanot	Yes
Compliance Branch Chief	Suhai E. Alston	Yes

**Planned Activities Toward Completion of Objective**

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing? (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
08/20/2025	Create a working group of stakeholders to update existing RA Instruction.	Yes		
07/15/2026	Submit updated RA Instruction to internal stakeholders for review.	Yes		
08/30/2026	Submit updated RA Instruction to the EEOC for review.	Yes		

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
2026	Working group has drafted revised RA policy (to include pregnancy, childbirth, or other related medical conditions) and procedures for efficiency and effective RA Program.

**Statement of Model Program Essential Element Deficiency**

<b>Type of Program Deficiency</b>	<b>Brief Description of Program Deficiency</b>
C.2.b.5 Management and Program Accountability	The Agency did not process all of its accommodation requests within the 30-day timeframe set forth in internal issuances.

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

<b>Date Initiated (mm/dd/yy)</b>	<b>Objective</b>	<b>Target Date (mm/dd/yy)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Date Completed (mm/dd/yyyy)</b>
08/20/2025	Update RA Instruction.	09/30/2026		
03/15/2026	Process backlog of full-time telework requests.	07/31/2026		

**Responsible Official(s)**

<b>Title</b>	<b>Name</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>
OEEEO Director	Rita Bhanot	Yes
Branch Chief for Compliance	Suhai Alston	Yes

**Planned Activities Toward Completion of Objective**

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing?  (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
08/20/2025	Create a working group of stakeholders to update existing RA Instruction.	Yes		
12/05/2025	Partner with Business Transformation Office to evaluate and recommend process improvements.	Yes		
03/15/2026	Created a Telework Working Group to process and effectively address full-time telework requests identified as RA requests.	Yes		

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
2026	Working group drafted revised RA procedures for efficiency and effective RA program.

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
C.5.a Management and Program Accountability	The Agency lacks a Disciplinary policy and or table of penalties that covers discriminatory conduct. The Agency follows DODI 1400.25.

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

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
03/20/2025	Draft an Agency-wide Disciplinary policy	09/30/2026	06/30/2027	

### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
HCMO/Employee Relations	Deana D. Rasnick	Yes

### Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2026	Continue coordination with stakeholders to finalize draft policy.	Yes		

### Report of Accomplishments

Fiscal Year	Accomplishments
2025	HCMO completed the draft Disciplinary policy and has submitted it to stakeholders for review.

**Statement of Model Program Essential Element Deficiency**

Type of Program Deficiency	Brief Description of Program Deficiency
E.1.a Efficiency	The Agency does not timely provide EEO counseling pursuant to 29 CFR §1614.105. Only one out of 42 counseling's exceeded the timeframe.

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

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/01/2024	Complete counseling within the 90-day timeframe.	09/30/2026	10/01/2025	

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
OEE0 Director	Rita Bhanot	Yes
OEE0 Branch Chief	Dr. Carey J. Williams	Yes

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2026	The OEE0 solicited a new EEO counseling contract vehicle for counseling, FAD writings, and investigations. Monitoring case processing timelines for both in-house and contract counseling.	Yes	01/01/2026	

09/30/2026	Revise current case management tracking tool by incorporating weekly updates; develop individual case tracker to assist the online e-complaints case management tool.	Yes	01/01/2026	
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**Report of Accomplishments**

Fiscal Year	Accomplishments
2025	The EEO complaints team meets regularly and provides updates to the complaints manager and to the Division Chief to detect any cases in jeopardy of not meeting timelines IAW MD-110.

**Statement of Model Program Essential Element Deficiency**

Type of Program Deficiency	Brief Description of Program Deficiency
E.1.f Efficiency	In limited instances, the Agency failed to complete investigations timely. The Agency received an unprecedented number of EEO contacts as well as formal investigations during this evaluation period. With only one investigative contract vehicle for the DoW, 2 Agency investigations out of fell outside the EEOC timeline of completion within 180 days. Nine of 11 cases were timely investigated in FY25.

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

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
02/01/2024	To ensure 100% of all investigations are timely processed IAW EEOC MD-110.	09/30/2026		

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan?  (Yes or No)
OEEO Director	Rita Bhanot	Yes
Complaints Branch Chief	Dr. Carey J. Williams	Yes

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing?  (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2026	Establish a contract vehicle for EEO investigation services.	Yes		10/01/2025

**Report of Accomplishments**

Fiscal Year	Accomplishments
2026	At the beginning of FY26, OEEO established a contract vehicle for EEO investigation services. Leveraging the DoW and Resolution Services (IRD), DCSA anticipates timely investigations in FY26.

**Statement of Model Program Essential Element Deficiency**

Type of Program Deficiency	Brief Description of Program Deficiency
E.1.h Efficiency	In certain instances, the Agency failed to timely issue the FAD pursuant to 29 CFR §1614.110(b).

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

<b>Date Initiated (mm/dd/yyyy)</b>	<b>Objective</b>	<b>Target Date (mm/dd/yyyy)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Date Completed (mm/dd/yyyy)</b>
05/01/2025	Develop a new FAD writing services contract vehicle to ensure efficiency, timeliness, and legal sufficiency prior to issuance to the complainant.	09/30/2026		10/01/2025

**Responsible Official(s)**

<b>Title</b>	<b>Name</b>	<b>Performance Standards Address the Plan?  (Yes or No)</b>
Complaints Branch Chief	Dr. Carey J. Williams	Yes

**Planned Activities Toward Completion of Objective**

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing?  (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
09/30/2026	Establish a new contract vehicle for FAD writing services, investigations, and EEO counseling.	Yes		10/01/2025

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
2025	OEEEO established a new contract vehicle for FAD writing services.

**Statement of Model Program Essential Element Deficiency**

<b>Type of Program Deficiency</b>	<b>Brief Description of Program Deficiency</b>
E.3.b Efficiency	The Agency does not require managers to participate in ADR once it has been offered.

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

<b>Date Initiated (mm/dd/yyyy)</b>	<b>Objective</b>	<b>Target Date (mm/dd/yyyy)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Date Completed (mm/dd/yyyy)</b>
02/01/2024	OEEEO-Complaints Branch and OEEEO Director to collaborate with DCSA-GC to promote use of ADR to resolve workplace issues at the lowest level, consistent with current ADR policy.	09/30/2025		11/12/2025

**Responsible Official(s)**

<b>Title</b>	<b>Name</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>
OEEEO Director	Rita Bhanot	Yes
Complaints Branch Chief	Dr. Carey J. Williams	Yes

**Planned Activities Toward Completion of Objective**

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing?  (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
09/20/2025	Update ADR Instruction to reflect managers are strongly encouraged to participate in mediation.	Yes		11/12/2025
09/30/206	Establish an ADR Program to manage Agency mediations, facilitations, and other related services in DCSA.	Yes		

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
2026	OEE0 fosters solid rapport with DCSA-GC, meeting regularly to resolve remaining concerns, revising ADR policy, and establishing basic foundational understandings to promote an effective DCSA ADR Program during FY2026.

## Part I: EEO Plan to Eliminate Identified Barriers

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.

### PART I. 1 - STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce data tables	AI	An analysis of the Civilian Labor Force (CLF) data indicates a lower-than-expected participation rate for Hispanic (male and female), Asian American (female), and White (male and female) personnel, even though these groups account for a combined 64% of the total DCSA workforce.

### EEO GROUP(S) AFFECTED BY TRIGGER

EEO Group	Affected by Trigger? (Yes/No)
All Men	Yes
All Women	No
Hispanic or Latino Males	Yes
Hispanic or Latina Females	Yes
White Males	Yes
White Females	Yes
Black or African American Males	No
Black or African American Females	No
Asian American Males	No
Asian American Females	No
Native Hawaiian or Other Pacific Islander Males	No
Native Hawaiian or Other Pacific Islander Females	No

EEO Group	Affected by Trigger? (Yes/No)
American Indian or Alaska Native Males	Yes
American Indian or Alaska Native Females	Yes
Two or More Races Males	No
Two or More Races Females	No

**BARRIER ANALYSIS PROCESS**

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected																																																																				
Workforce Data Tables A1	Yes	<p>At the conclusion of FY 2025, DCSA had a total permanent workforce of 5204 employees. DCSA's workforce is an organization with broad demographic representation. Participation rates for groups falling below the CLF are noted in red, as noted in Part A. Further analysis reveals the following:</p> <p><b><u>Hires and Separations</u></b></p> <p>DCSA gained 390 employees during FY 2025 and lost 703 employees. The following table shows a comparison of the rates of each group within new hires and separations by ERI/G to their respective workforce participation and CLF rates. The benchmark for workforce participation and new hires is the CLF, and the benchmark for separations is workforce participation. New hires <u>below</u> the CLF are in red. Separations <u>above</u> the workforce participation rate are in red.</p> <table border="1"> <thead> <tr> <th rowspan="2">ERIC</th> <th rowspan="2">CLF 2014-2018</th> <th colspan="3">FY 2025</th> </tr> <tr> <th>Workforce Participation</th> <th>New Hires</th> <th>Separations</th> </tr> </thead> <tbody> <tr> <td>Males</td> <td>51.79%</td> <td>47.67%</td> <td>48.21%</td> <td>47.81%</td> </tr> <tr> <td>Females</td> <td>48.21%</td> <td>52.25%</td> <td>51.79%</td> <td>52.19%</td> </tr> <tr> <td>Hispanic Males</td> <td>6.82%</td> <td>3.65%</td> <td>5.38%</td> <td>3.36%</td> </tr> <tr> <td>Hispanic Females</td> <td>6.16%</td> <td>4.19%</td> <td>3.33%</td> <td>3.36%</td> </tr> <tr> <td>White Males</td> <td>35.64%</td> <td>32.80%</td> <td>29.23%</td> <td>32.02%</td> </tr> <tr> <td>White Females</td> <td>31.82%</td> <td>30.92%</td> <td>27.44%</td> <td>29.82%</td> </tr> <tr> <td>Black Males</td> <td>5.70%</td> <td>7.65%</td> <td>7.95%</td> <td>7.46%</td> </tr> <tr> <td>Black Females</td> <td>6.61%</td> <td>13.82%</td> <td>15.64%</td> <td>15.64%</td> </tr> <tr> <td>2.49Asian Males</td> <td>2.19%</td> <td>2.73%</td> <td>3.85%</td> <td>2.49%</td> </tr> <tr> <td>Asia 1.17n Females</td> <td>2.18%</td> <td>2.23%</td> <td>2.28%</td> <td>1.17%</td> </tr> <tr> <td>Native Hawaiian-Pacific Islander Males</td> <td>.08%</td> <td>.15%</td> <td>.26%</td> <td>.29%</td> </tr> <tr> <td>Native Hawaiian-Pacific Islander</td> <td>.08%</td> <td>.33%</td> <td>.26%</td> <td>.00%</td> </tr> </tbody> </table>	ERIC	CLF 2014-2018	FY 2025			Workforce Participation	New Hires	Separations	Males	51.79%	47.67%	48.21%	47.81%	Females	48.21%	52.25%	51.79%	52.19%	Hispanic Males	6.82%	3.65%	5.38%	3.36%	Hispanic Females	6.16%	4.19%	3.33%	3.36%	White Males	35.64%	32.80%	29.23%	32.02%	White Females	31.82%	30.92%	27.44%	29.82%	Black Males	5.70%	7.65%	7.95%	7.46%	Black Females	6.61%	13.82%	15.64%	15.64%	2.49Asian Males	2.19%	2.73%	3.85%	2.49%	Asia 1.17n Females	2.18%	2.23%	2.28%	1.17%	Native Hawaiian-Pacific Islander Males	.08%	.15%	.26%	.29%	Native Hawaiian-Pacific Islander	.08%	.33%	.26%	.00%
ERIC	CLF 2014-2018	FY 2025																																																																				
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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected				
		Females				
		American Indian or Alaska Native Males	.31%	.42%	.00%	.44%
		American Indian or Alaska Native Females	.31%	.33%	.00%	.00%
		Two or More Races Males	1.05%	.35%	1.54%	1.75%
		Two or More Races Females	1.05%	.44%	2.31%	2.19%
<b>Applicant Flow Data</b>						
<p>Examination of applicant flow data for DCSA's major occupations (General Investigation (1810), Security Administration (0080), General Inspection, Investigation, Enforcement, and Compliance (1801), Information Technology Management (2210), and Intelligence (0132) indicates that 100% of males (60%) and females (40%) of all qualified applicants voluntarily identified their race, ethnicity, and gender. The following table is for Security Administration (0080), representing the largest segment of the DCSA workforce.</p>						
FRPC	CLF	Applied	Qualified	Referred	Selected	
Males	51.79%	57.76%	54.60%	52.63%	58.33%	
Females	48.21%	42.24%	45.40%	47.37%	41.67%	
Hispanic Males	6.82%	8.07%	7.13%	7.05%	8.33%	
Hispanic Females	6.16%	5.60%	5.51%	5.79%	5.56%	
White Males	35.64%	26.00%	24.19%	22.74%	25.00%	
White Females	31.82%	17.21%	20.22%	20.42%	16.67%	
Black Males	5.70%	17.27%	17.06%	16.42%	11.11%	
Black Females	6.61%	15.78%	16.06%	17.47%	19.44%	
Asian American Males	2.19%	4.47%	4.15%	4.11%	8.33%	
Asian American Females	2.18%	1.90%	1.62%	1.47%	.00%	
Native Hawaiian or Pacific Islander Males	.08%	.21%	.18%	.21%	.00%	
Native Hawaiian or Pacific Islander Females	.08%	.10%	.18%	.21%	.00%	
American Indian or Alaska Native Males	.31%	.92%	1.35%	1.47%	2.78%	
American Indian or Alaska Native Females	.31%	.87%	.99%	1.16%	.00%	
Two or More	1.05%	.82%	.54%	.63%	2.78%	

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected												
		<table border="1" data-bbox="505 394 1354 485"> <tr> <td data-bbox="505 394 727 426">Races - Males</td> <td data-bbox="727 394 824 426"></td> <td data-bbox="824 394 954 426"></td> <td data-bbox="954 394 1084 426"></td> <td data-bbox="1084 394 1214 426"></td> <td data-bbox="1214 394 1354 426"></td> </tr> <tr> <td data-bbox="505 426 727 457">Two or More Races - Females</td> <td data-bbox="727 426 824 457">1.05%</td> <td data-bbox="824 426 954 457">.77%</td> <td data-bbox="954 426 1084 457">.81%</td> <td data-bbox="1084 426 1214 457">.84%</td> <td data-bbox="1214 426 1354 457">.00%</td> </tr> </table> <p data-bbox="505 520 1354 751">A review of the data indicates that while the applicant pools were diverse, with all ethnicities and races being qualified and referred, selection rates varied significantly. White applicants accounted for 42% of all selections, followed by Black or African American applicants at 31%, and Hispanic or Latino applicants at approximately 14%. In contrast, several groups—including Native Hawaiian/Pacific Islanders, American Indians, and individuals of two or more races—were each selected at rates below 3%. Consequently, a barrier analysis will be conducted on the recruitment and application stages for these underrepresented populations.</p>	Races - Males						Two or More Races - Females	1.05%	.77%	.81%	.84%	.00%
Races - Males														
Two or More Races - Females	1.05%	.77%	.81%	.84%	.00%									
Complaint Data (Trends)	No													
Grievance Data (Trends)	N/A													
Findings from Decisions	No													
Climate Assessment Survey (e.g., FEVS)	No													
Exit Interview Data	No													
Focus Groups	No													
Interviews	No													
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No													
Other (Please Describe)	N/A													

### STATUS OF BARRIER ANALYSIS PROCESS

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

### STATEMENT OF IDENTIFIED BARRIER(S)

<b>Description of Policy, Procedure, or Practice</b>
<p><b>Consistent underrepresentation of women and minorities in senior level (GG-13-SES) positions.</b></p> <p><b>Policy:</b> Senior level position announcements are open to the public, externally, nationwide only. No internal promotion announcements at this level.</p> <p><b>Practice:</b> Limited outreach events outside the standard institutions.</p> <p><b>Practice:</b> Limited/no availability, use, or comprehension of applicant flow data to communicate deficiencies.</p> <p><b>Practice:</b> DCSA hiring practices included a more diverse and inclusive approach prior to January 2025. Agency followed current Administration's EO for hiring based merits.</p>

### OBJECTIVE(S) AND DATES FOR EEO PLAN

<b>Objective</b>	<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding &amp; Staffing? (Yes or No)</b>	<b>Modified Date</b>	<b>Date Completed</b>
Complete a barrier analysis to identify specific policy, procedure or practices that may be causing triggers.	05/25/2026	09/30/2027	Yes		
Examine triggers to determine reasons why certain groups are underrepresented in the workplace.	05/30/2026	09/30/2027	Yes		
Recommend and communicate ways to eliminate identified barriers.	05/30/2026	09/30/2027	Yes		

<b>Objective</b>	<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding &amp; Staffing? (Yes or No)</b>	<b>Modified Date</b>	<b>Date Completed</b>
Track progress towards reversing or eliminating identified barriers.	05/30/2026	09/30/2027	Yes		

**RESPONSIBLE OFFICIAL(S)**

<b>Title</b>	<b>Name</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>
Director, EEO	Ms. Rita Bhanot	Yes
Deputy Director, EEO	Mr. Mohammed B. Kabir	Yes
Branch Chief, Complaints Division	Dr. Carey J. Williams	Yes
Branch Chief, Compliance Division	Ms. Suhai E. Alston	Yes
Branch Chief, Affirmative Employment Division	Ms. Deirdre K. Garrett	Yes
Director, Human Capital Management Office	Mr. Richard M. Rennolds	Yes

**PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE**

<b>Target Date</b>	<b>Planned Activities</b>	<b>Modified Date</b>	<b>Completion Date</b>
03/2024	Conduct barrier analysis and identify triggers impacting affected populations.	04/21/2026	09/30/2027
09/2026	Conduct a comprehensive applicant flow data analysis of DCSA's major occupations and senior leadership occupations.	04/21/2026	09/30/2027
09/2026	Increase outreach and recruitment efforts to include veteran/reserve members and disabled populations.	04/21/2026	09/30/2027
09/2026	Gather, consolidate stay survey, assess component focus group, and evaluate other approved satisfaction	04/21/2026	09/30/2027

Target Date	Planned Activities	Modified Date	Completion Date
	survey data to identify possible trends and barriers that affect and/or influence identified populations.		

**REPORT OF ACCOMPLISHMENTS**

Fiscal Year	Accomplishments

**PART I.2 - STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:**

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce data tables	A4	Certain demographic groups have lower participation rates in GG-13 through 15 and DISES as compared to total workforce participation.

**EEO GROUP(S) AFFECTED BY TRIGGER**

EEO Group	Affected by Trigger? (Yes/No)
All Men	No
All Women	Yes (GG-13 through 15, SES)
Hispanic or Latino Males	Yes (GG-15, SES)
Hispanic or Latino Females	Yes (GG-13 through 15, SES)
White Males	No
White Females	Yes (GG-13 through 15, SES)
Black or African American Males	No
Black or African American Females	Yes (GG-13 through 15, SES)
Asian Males	Yes (SES)
Asian Females	Yes (SES)
Native Hawaiian or Other Pacific Islander	Yes (SES)

EEO Group	Affected by Trigger? (Yes/No)
Males	
Native Hawaiian or Other Pacific Islander Females	Yes (GG-13 & SES)
American Indian or Alaska Native Males	Yes (GG-13)
American Indian or Alaska Native Females	Yes (GG-14 & SES)
Two or More Races Males	Yes (GG-14 through SES)
Two or More Races Females	Yes (GG-13 & SES)

### BARRIER ANALYSIS PROCESS

Participation rates for grades 13, 14, 15, and SES are shown below and groups falling below their respective workforce participation rates are indicated in red.

Sources of Data	Source Reviewed ? (Yes or No)	Identify Information Collected						
		ERIC	Workforce Participation	GG-13	GG-14	GG-15	SES	
Workforce Data Tables A1, A4, A7 (SES)	Yes							
	<b>All</b>	Male	47.75%	2485	54.75%	58.06%	62.14%	73.68%
		Female	52.25%	2719	45.25%	41.94%	37.86%	26.32%
	<b>Hispanic or Latino</b>	Male	3.65%	190	4.01%	4.12%	1.46%	2.63%
		Female	4.19%	218	3.87%	1.97%	.97%	2.63%
	<b>White</b>	Male	32.80%	1707	37.51%	37.99%	48.54%	63.16%
		Female	30.92%	1609	26.32%	23.30%	23.79%	23.68%
	<b>Black or African American</b>	Male	7.65%	398	8.80%	10.04%	7.77%	5.26%
		Female	13.82%	719	11.82%	12.90%	9.71%	.00%
	<b>Asian</b>	Male	2.73%	142	3.24%	4.48%	2.91%	.00%

Sources of Data	Source Reviewed ? (Yes or No)	Identify Information Collected							
			Female	2.23%	116	2.39%	2.33%	1.94%	.00%
		Native Hawaiian or Other Pacific Islander	Male	.15%	8	.28%	.18%	.49%	.00%
			Female	.33%	17	.14%	.36%	.49%	.00%
		American Indian or Alaska Native	Male	.42%	22	.42%	1.25%	.00%	2.63%
			Female	.33%	17	.42%	.18%	.49%	.00%
		Two or More Races	Male	.35%	18	.49%	.00%	.97%	.00%
Female	.44%		23	.28%	.90%	.49%	.00%		
Complaint Data (Trends)	No								
Grievance Data (Trends)	No								
Findings from Decisions	No								
Climate Assessment Survey (e.g., FEVS)	No								
Exit Interview Data	No								
Focus Groups	No								
Interviews	No								
Reports (e.g., Congress,	No								

Sources of Data	Source Reviewed ? (Yes or No)	Identify Information Collected																																																																																										
EEOC, MSPB, GAO, OPM)																																																																																												
		<p><b><u>Applicant Flow Data</u></b></p> <p>A review of the applicant flow data for FY 2025 of applicants for GG-13 through 15 and DISES positions were conducted. Of the applicants for GG-13 through 15 and DISES positions, all identified their race and/or gender.</p> <p>A preliminary data review reveals a complex landscape of hiring and promotion trends. While White applicants were selected at a higher rate than any other group overall, there are significant nuances within senior and leadership roles.</p> <table border="1" data-bbox="479 913 1349 1724"> <thead> <tr> <th colspan="5" data-bbox="479 913 1349 966">SES</th> </tr> <tr> <th data-bbox="479 966 755 1029">ERI G</th> <th data-bbox="755 966 917 1029">CLF</th> <th data-bbox="917 966 1055 1029">Applied</th> <th data-bbox="1055 966 1209 1029">Qualified</th> <th data-bbox="1209 966 1349 1029">Referred</th> </tr> </thead> <tbody> <tr> <td data-bbox="479 1029 755 1060">Males</td> <td data-bbox="755 1029 917 1060">51.84%</td> <td data-bbox="917 1029 1055 1060">69.81%</td> <td data-bbox="1055 1029 1209 1060">67.16%</td> <td data-bbox="1209 1029 1349 1060">67.16%</td> </tr> <tr> <td data-bbox="479 1060 755 1092">Females</td> <td data-bbox="755 1060 917 1092">48.16%</td> <td data-bbox="917 1060 1055 1092">30.19%</td> <td data-bbox="1055 1060 1209 1092">32.84%</td> <td data-bbox="1209 1060 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Sources of Data	Source Reviewed ? (Yes or No)	Identify Information Collected
Grievance Data (Trends)	No	
Findings from Decisions	No	
Climate Assessment Survey (e.g., FEVS)	No	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	N/A	

**STATUS OF BARRIER ANALYSIS PROCESS**

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

**STATEMENT OF IDENTIFIED BARRIER(S)**

Description of Policy, Procedure, or Practice
<p><b>Policy Barrier:</b> The 2025 EEO Policy Statement was issued in July 2025; however, it was determined that the policy was non-compliant with EEOC guidance and relevant regulatory guidance as further described below. As set forth in 29 CFR § 1614.101(a), "It is the policy of the Government of the United States to provide equal opportunity in employment for all persons, to prohibit discrimination in employment because of race; color; religion; sex; national origin; age; disability; genetic information; or pregnancy, childbirth, or related medical conditions; and to promote the full realization of equal employment opportunity through a continuing affirmative program in each agency."</p> <p><b>Practice:</b> A revised policy statement reflects EEOC guidance effective, April 17, 2026, and that policy statement was issued and made readily available to all DCSA employees.</p>

**OBJECTIVE(S) AND DATES FOR EEO PLAN**

Objective	Date Initiated	Target Date	Sufficient Funding & Staffing? (Yes or No)	Modified Date	Date Completed
Complete Barrier Analysis, identify triggers		09/30/2027	Yes		

**RESPONSIBLE OFFICIAL(S)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
Director, EEO	Ms. Rita Bhanot	Yes
Deputy Director, EEO	Mr. Mohammed B. Kabir	Yes
Branch Chief, Complaints Division	Dr. Carey J. Williams	Yes
Branch Chief, Compliance Division	Ms. Suhai E. Alston	Yes
Affirmative Employment Program Manager	Ms. Deirdre K. Garrett	Yes
Director, Human Capital Management Office	Mr. Richard M. Rennolds	Yes

**PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE**

	Planned Activities	Modified Date	Completion Date
09/2025	Conduct a review of DCSA's merit promotion program.		

09/2025	Examine tracking methods for career development and mentoring programs to ensure accuracy.		
09/2025	Conduct a comprehensive barrier analysis of higher grades and senior executive positions.		

**REPORT OF ACCOMPLISHMENTS**

Fiscal Year	Accomplishments
FY2025	Lack of sufficient funding and staff prevented planned activities to be carried out.

**Part J: Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities**

**EEOC FORM**

*U.S. Equal Employment Opportunity Commission*

**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

In accordance with EEOC regulations (29 C.F.R. § 1614.203(e)) and Management Directive 715, Federal agencies are required to establish a formal affirmative action plan for Persons with Disabilities (PWD) and Persons with Targeted Disabilities (PWTD). It is a mandatory requirement for all agencies, irrespective of size, to complete this part of the MD-715 report. The plan must articulate how the agency will improve its strategies for the recruitment, hiring, advancement, and retention of these individuals.

**Section I: Efforts to Reach Regulatory Goals**

In accordance with EEOC regulations (29 C.F.R. § 1614.203(d)(7)), which require Federal agencies to set numerical goals for workforce participation, DCSA analyzed the agency's representation of Persons with Disabilities (PWDs).

Using the federally mandated 12% goal as the benchmark, this analysis examines the permanent workforce by grade level cluster to determine if any triggers exist. The following text box describes the specific triggers identified where participation rates fell below this benchmark.

Cluster GG-1 to GG-10	(PWD)	Yes X	No 0
Cluster GG-11 to SES	(PWD)	Yes 0	No X

Analysis of the permanent workforce data contained in Table B-4 indicates that the percentage of PWD in the GG-1 to GG-10 cluster was 10.69% in FY 2025. That is an increase from 9.81% in FY 2024; however, that percentage still falls below the 12% goal. There are only 580 employees in that grade compared to 4,624 employees in the GG-11- SES. In compliance with EOs and OPM Guidance, DCSA discontinued certain piloting programs that directly

influenced the increased participation rates for PWD at those grade levels.

Using the goal of 2% 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.

Cluster GG-1 to GG-10	(PWD)	Yes X	No 0
Cluster GG-11 to SES	(PWD)	Yes 0	No X

Analysis of the permanent workforce data contained in Table B-4 indicates the percentage of PWD in the GG-1 to GG-10 cluster was 1.65% in FY24, and that percentage decreased to 0.86% during FY25, which is below the 2% goal. In compliance with an EO and OPM Guidance, DCSA discontinued certain piloting programs that directly influenced the increased participation rates for PWD at those grade levels.

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

Numeric hiring goals are shared during reoccurring senior leadership meetings and the monthly new employee orientation. Those goals are also presented at the annual State of the Agency briefing and are discussed with hiring managers and HCMO. The goals are also highlighted on a quarterly basis in the demographic dashboard. Additionally, Part J was published in the Agency's internal and external webpages.

## 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.

### Plan to Provide Sufficient & Competent Staffing for the Disability Program

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

Yes X      No 0

N/A

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWD			1	Ms. Kimberly L. Kersey Branch Chief, Special Hiring Human Capital Management Office <a href="mailto:Kimberly.l.kersey.civ@mail.mil">Kimberly.l.kersey.civ@mail.mil</a>
Answering questions from the public about hiring authorities that take disability into account			1	Ms. Kimberly L. Kersey Branch Chief, Special Hiring Human Capital Management Office <a href="mailto:Kimberly.l.kersey.civ@mail.mil">Kimberly.l.kersey.civ@mail.mil</a> **The recruitment team has 4 Recruiters and disability recruitment is a shared responsibility between all the Recruiters.
Processing reasonable accommodation requests from applicants and employees	4			Ms. Lori A. Lupo, Disability Program Manager, Office of Equal Employment Opportunity <a href="mailto:lorraine.a.lupo.civ@mail.mil">lorraine.a.lupo.civ@mail.mil</a>  Ms. Joy M. Chontosh, EEO Specialist Office of Equal Employment Opportunity <a href="mailto:Joy.m.chontosh.civ@mail.mil">Joy.m.chontosh.civ@mail.mil</a>  Ms. Natasha D. Stanton, Compliance EEO Specialist, Office of Equal Employment Opportunity <a href="mailto:Natasha.d.stanton.civ@mail.mil">Natasha.d.stanton.civ@mail.mil</a>  Ms. Dahlia K. Thomas, EEO Specialist Office of Equal Employment Opportunity <a href="mailto:dahlia.k.thomas.civ@mail.mil">dahlia.k.thomas.civ@mail.mil</a>  MSG William Cheung, USA, Equal Opportunity Advisor Office of Equal Employment Opportunity <a href="mailto:william.cheung.mil@mail.mil">william.cheung.mil@mail.mil</a>
Section 508 Compliance	1			Mr. Horrace Russell, 508 Program Coordinator <a href="mailto:Horrace.rusell12.civ@mail.mil">Horrace.rusell12.civ@mail.mil</a>
Architectural	1			Ms. Lorraine A. Lupo, Disability Program

Barriers Act Compliance				Manager <a href="mailto:Lorraine.a.lupo.civ@mail.mil">Lorraine.a.lupo.civ@mail.mil</a> in coordination with Logistics Management Divisions and Facilities Management
Affirmative Employment Program for PWD and PWTD	1			Ms. Deirdre (Dee Dee) K. Garrett, Branch Chief, Equal Employment Specialist Office of Equal Employment Opportunity <a href="mailto:deirdre.k.garrett.civ@mail.mil">deirdre.k.garrett.civ@mail.mil</a>

Has the agency provided disability 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

In FY 2025, the Agency engaged in training designed to increase the knowledge and skills among disability program staff. Key staff attended the Federal Dispute Resolution Conference, CAP/Ergonomics Funding and Procurement training, and the Tyler Tech RA User Forum.

**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.

**Plan to Identify Job Applicants with Disabilities**

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

DCSA maintains working relationships with multiple universities and colleges, collaborates with Armed Forces transition coordinators and medical treatment facilities, and engages with other prominent organizations that service veteran and disabled members.

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.

Under the Defense Civilian Intelligence Program (DCIPS) personnel system, DCSA is under the excepted service and does not have Schedule A hiring authority. Prior to the implementation of the hiring freeze during FY 2025, DCSA piloted a Persons with Disabilities (PWD) recruitment initiative designed to increase access to qualified applicants with disabilities. The program connected hiring managers with qualified candidates from the disability community

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.

The applications are referred to the recruitment HCMO. HCMO replies to the individual and provides advice on where to find open positions, how to apply and whether Schedule A applies.

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

Yes  No  N/A

DCSA does not have Schedule A hiring authority under DCIPS. Education, guidance, and awareness via training are provided to each hiring manager when requests for recruitment are initiated.

### **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.

DCSA maintains a partnership with a variety of organizations and programs that support recruitment and employment opportunities for individuals with disabilities. Outreach efforts include engagement with colleges and university, participation in the DoW Operation Warfighter Internship Program and the Department of Veterans Affairs Non-Paid Work Experience Program, and active attendance at Wounded Warrior employment events.

Additionally, the Agency has begun evaluating participation in the Office of Personnel Management's Workforce Recruitment Program (WRP) as a potential pipeline for recruiting qualified college students and recent graduates with disabilities. This effort is intended to further strengthen the agency's outreach strategy and expand access to candidates eligible for Federal employment.

**Progression Towards Goals (Recruitment and Hiring)**

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

New Hires for Permanent Workforce	(PWD)	Yes 0	No X
New Hires for Permanent Workforce	(PWTD)	Yes X	No 0

In FY 2025, both PWD and PWTD observed a significant shift in percentage trend for new hires in the permanent workforce. While PWD remains well above the 12% goal, PWTD declined drastically below the 2% goal. PWD new hires are at 55.90% while PWTD new hires are 1.02%.

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.

New Hires for MCO	(PWD)	Yes X	No 0
New Hires for MCO	(PWTD)	Yes X	No 0

DCSA has 5 mission-critical occupations (MCO). The occupations are the following: 0080, 0132, 1801, 1810, and 2210. Analysis of the hiring data on Table B6 indicates hiring for PWD and PWTD in the MCO's listed below fall below the 12 and 2 % goals, respectively.

1801, PWD: 0  
 1801, PWTD: 0  
  
 1810, PWD: 0  
 1810, PWTD: 0  
  
 2210, PWTD: 0

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.

Qualified Applicants for MCO	(PWD)	Yes 0	No 0
Qualified Applicants for MCO	(PWTD)	Yes 0	No 0

DCSA does not have relevant applicant data. N/A

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.

Promotions for MCO	(PWD)	Yes X	No 0
Promotions for MCO	(PWTD)	Yes X	No 0

The triggers that exist for the internal competitive promotions in the mission-critical occupations were within 1810. There were 3 internal competitive promotions in the 1810 MCO, but no promotions are identified as PWD or PWTD.

## 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.

### Advancement Program Plan

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

PWD and PWTD are considered, along with all eligible employees without disabilities, for the Leadership Development Program, career development training, mentoring, awards, specialized training, promotions, and any other advancement programs.

DCSA's compliance team provides customized training for managers and supervisors to increase knowledge across the workforce of reasonable accommodation requirements and protocols. The training focuses on the decision-maker's role and responsibilities as well as those of the employee and of the compliance team. The goal is to equip managers and supervisors with the tools and resources available for conducting the interactive process, coordinating with the RA team, and effectively navigating through the RA process.

### Career Development Opportunities

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

DCSA Leadership Development Program (LDP)  
 Executive Leadership Development Program (ELDP)  
 National Defense University College (NDU)  
 Defense Senior Leader Development Program (DSLDP)  
 Defense Civilian Emerging Leader Program  
 White House Leadership Development Program  
 Joint Duty Program and rotational assignments  
 United States Army War College (USAWC)

In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation approval to participate.

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Coaching Skills for leaders	222	222	29	13.06	7	3.15
Foundations of Leadership	230	230	26	11.30	4	1.73
Individual Coaching	94	94	15	15.95	3	3.19
Leading From Where You Are	57	57	6	10.53	2	3.50
Lean Six Sigma	282	282	41	14.53	5	1.77
Mentoring	106	106	12	11.32	4	3.77
Organizational Development	8	8	2	25.00	0	.00
Professional Development	674	674	97	14.39	24	3.56
Scaled Agile	235	235	34	14.46	3	1.27
Team Coaching	1	1	0	.00	0	.00
Team Engagement	12	12	0	.00	0	.00
Toastmasters	65	65	9	13.84	1	1.53

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

Applicants	(PWD)	Yes 0	No X
Selections	(PWD)	Yes 0	No X

N/A

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

Applicants	(PWTD)	Yes 0	No X
Selections	(PWTD)	Yes 0	No X

N/A

**Awards**

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

Awards, Bonuses, & Incentives	(PWD)	Yes X	No 0
Awards, Bonuses, & Incentives	(PWTD)	Yes X	No 0

An analysis of employee recognition and awards was conducted to assess inclusion rates for employees with disabilities within the permanent workforce. The Agency's permanent workforce consists of 5,204 employees, of which 658 employees (12.64%) identify as People with Disabilities (PWD) and 104 employees (2.00%) identify as People with Targeted Disabilities (PWTD).

The inclusion rate of the below categories reflect triggers within awards and recognition; the agency is diligently working to ensure equitable recognition across the workforce.

**Time-Off Awards:**

11-20 Hours: Trigger for PWTD (0.14%)  
 21-30 Hours: Trigger for PWTD (0.07%)

**Cash Awards:**

\$500-\$999: Trigger for PWTD and PWD (0%)  
 \$2000-\$2999: Trigger for PWTD (1.54%); PWD (11.59%)  
 \$3000-\$3999: Trigger for PWTD (0.40%); PWD (3.33%)

\$4000-\$4999: Trigger for PWTD and PWD at (0%)  
 \$5000+: Trigger for PWTD (0.09%); PWD (1.31%)

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

Pay increases	(PWD)	Yes 0	No X
Pay increases	(PWTD)	Yes 0	No X

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

Other types of recognition	(PWD)	Yes 0	No 0	N/A X
Other types of recognition	(PWTD)	Yes 0	No 0	N/A X

N/A

**Promotions**

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-GG pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

**\*SES**

Qualified internal applicants	(PWD)	Yes X	No 0
Internal selections	(PWD)	Yes X	No 0

**Grade GG-15**

Qualified internal applicants	(PWD)	Yes X	No 0
Internal selections	(PWD)	Yes X	No 0

**Grade GG-14**

Qualified internal applicants	(PWD)	Yes X	No 0
Internal selections	(PWD)	Yes X	No 0

**Grade GG-13**

Qualified internal applicants	(PWD)	Yes 0	No X
Internal selections	(PWD)	Yes 0	No X

Relevant applicant data is not available

**DISES and/or Defense Intelligence Senior Level (DISL):** There was 1 internal vacancy announcement. There were 2 qualified applicants. Each identified as having no disability (100%), zero identified as PWD, and no one chose to not identify. There were no selections, no disabilities, no PWD, and no one chose to not identify.

**GG-15:** There were 2 internal vacancy announcements. There were 16 qualified applicants. 13 identified as having no disability (81.25%), 1 identified as PWD (6.25%), and 2 chose not to identify (12.50%). There were 0 selections, 0 no disability, 0 PWD, and no one chose to not identify.

**GG-14:** There were 8 internal vacancy announcements. There were 33 qualified applicants. 26 identified as having no disability (78.79%), 2 identified as PWD (6.06%), and 5 chose not to identify (15.15%). There were 2 selections, 2 (100%) no disability, 0 PWD, and no one chose to not identify.

**GG-13:** There were 24 internal vacancy announcements. There were 250 qualified applicants. 190 (76%) identified as having no disability, 41 (16.40%) identified as PWD, and 19 (7.6%) chose not to identify. There were 5 selected, 4 (80%) no disability, 1 (20%) PWD, and none chose to not identify.

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-GG pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

**\*SES**

Qualified internal applicants	(PWTD)	Yes X	No 0
Internal selections	(PWTD)	Yes X	No 0

**Grade GG-15**

Qualified internal applicants	(PWTD)	Yes 0	No 0
Internal selections	(PWTD)	Yes X	No 0

**Grade GG-14**

Qualified internal applicants	(PWTD)	Yes 0	No 0
Internal selections	(PWTD)	Yes X	No 0

**Grade GG-13**

Qualified internal applicants	(PWTD)	Yes 0	No 0
Internal selections	(PWTD)	Yes X	No 0

Relevant applicant data is not available

SES: There were 2 qualified applicants. 2 identified as having no disability (100%), 0 identified as PWTD, and 0 chose not to identify. There were 0 selections, 0 no disability, 0 PWTD, and 0 chose not to identify.

GG-15: There were 16 qualified applicants. 13 identified as having no disability (81.25%), 1 identified as PWTD (6.25%), and 2 chose not to identify (12.50%). There were 0 selections, 0 no disability, 0 PWTD, and 0 chose not to identify.

GG-14: There were 33 qualified applicants. 26 identified as having no disability (78.79%), 1 identified as PWTD (3.03%), and 5 chose not to identify (15.15%) There were 2 selections, 2 (100%) no disability, 0 PWTD, and 0 chose not to identify.

GG-13: There were 250 qualified applicants. 190 (76%) identified as having no disability, 16 (6.40%) identified as PWTD, and 19 (7.6%) chose not to identify. There were 5 selections, 4 (80%) no disability, 0 PWTD, and 0 chose not to identify.

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-GG pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

New hires to SES	(PWD)	Yes X	No 0
New hires to GG-15	(PWD)	Yes X	No 0
New hires to GG-14	(PWD)	Yes 0	No X
New hires to GG-13	(PWD)	Yes 0	No X

**DISES and/or DISL:** There were 3 vacancy announcements. There were 28 qualified applicants. 22 (78.57%) identified as no disability, 2 (7.14%) identified as PWD, and 4 (14.29%) chose not to identify. There were 3 selections, 3 no disability, 0 PWD, and none chose to not identify.

**GG-15:** There were 16 vacancy announcements. There were 161 qualified applicants. 104 (64.60%) identified as no disability, 34 (21.12%) identified as PWD, and 23 (14.29%) chose not to identify. There were 6 selections, 4 (66.67%) no disability, 0 PWD, and 2 (33.33%) chose not to identify.

**GG-14:** There were 34 vacancy announcements. There were 716 qualified applicants. 531 (74.16%) identified as no disability, 98 (13.69%) identified as PWD, and 87 (12.15%) chose not to identify. There were 15 selections, 12 (80.00%) no disability, 2 PWD (13.33%), and 1 (6.67%) chose not to identify.

**GG-13:** There were 57 vacancy announcements. There were 1274 qualified applicants. 959 (75.27%) identified as no disability, 175 (13.74%) identified as PWD, and 140 (10.99%) chose not to identify. There were 19 selections, 14 (73.68%) no disability, 5 PWD (26.32%), and 0 chose not to identify.

It is important to note that DISES, DISL, GG-15, GG-14 and GG-13 PWD in the permanent workforce all meet or exceed the 12 % goal.

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-GG pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

New hires to SES	(PWTD)	Yes X	No 0
New hires to GG-15	(PWTD)	Yes X	No 0
New hires to GG-14	(PWTD)	Yes X	No 0
New hires to GG-13	(PWTD)	Yes 0	No X

SES: 28 qualified applicants. 22 (78.57%) identified as no disability, 1 (3.57%) identified as PWTD, and 4 (14.29%) chose not to identify. There were 3 selections, 3 no disability, 0 PWTD, and 0 chose not to identify.

GG-15: 161 qualified applicants. 104 (64.60%) identified as no disability, 11 (6.83%) identified as PWTD, and 23 (14.29%) chose not to identify. There were 6 selections, 4 (66.67%) no disability, 0 PWTD, and 2 (33.33%) chose not to identify.

GG-14: 716 qualified applicants. 531 (74.16%) identified as no disability, 51 (7.12%) identified as PWTD, and 87 (12.15%) chose not to identify. There were 15 selections, 12 (80.00%) no disability, 0 PWTD, and 1 (6.67%) chose not to identify.

GG-13: 1274 qualified applicants. 959 (75.27%) identified as no disability, 78 (6.12%) identified as PWTD, and 140 (10.99%) chose not to identify. There were 19 selections, 14 (73.68%) no disability, 2 PWTD (10.53%), and none chose not to identify.

It is important to note that DISES, GG-14, and GG-13 PWTD in the permanent workforce all exceed the 2 % goal.

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.

**Executives**

Qualified internal applicants (PWD)	Yes 0	No 0
Internal selections (PWD)	Yes X	No 0

**Managers**

Qualified internal applicants (PWD)	Yes 0	No 0
Internal selections (PWD)	Yes 0	No 0

**Supervisors**

Qualified internal applicants (PWD)	Yes 0	No 0
Internal selections (PWD)	Yes X	No 0

DCSA does not collect relevant applicant data. Data is also unavailable for internal applicants at the management level.

Executive: There were 2 qualified applicants for internal competitive promotions at the executive level. Both are identified as a person without a disability. No selections were made.

Supervisory internal applicants are not broken down by grade level. Collectively there were 113 qualified applicants. 89 (78.76%) identified as no disability, 16 (14.16%) identified as PWD, and 8 (7.08%) did not identify. There were 4 selections, 4 (100%) no disability, 0 PWD, and none chose not to identify.

In FY 2025, DCSA met the PWD 12 % goal in the Management and Supervisory occupational categories.

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.

**Executives**

Qualified internal applicants	(PWTD)	Yes 0	No 0
Internal selections	(PWTD)	Yes 0	No 0

**Managers**

Qualified internal applicants	(PWTD)	Yes 0	No 0
Internal selections	(PWTD)	Yes 0	No 0

**Supervisors**

Qualified internal applicants	(PWTD)	Yes 0	No 0
Internal Selections	(PWTD)	Yes X	No 0

DCSA does not collect relevant applicant data. Data is also unavailable for internal applicants at the management level.

Executive: There were 2 qualified applicants for internal competitive promotions at the executive level. Both are identified as a person without a disability. No selections were made.

Supervisory internal applicants are not broken down by grade level. Collectively, there were 113 qualified applicants. 89 (78.76%) identified as no disability, 6 (5.31%) identified as PWTD, and 8 (7.08) did not identify. There were 4 selections, including 4 (100%) with no disability, 0 PWTD, and none chose not to identify.

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.

New hires for executives	(PWD)	Yes X	No 0
New hires for managers	(PWD)	Yes 0	No 0
New hires for supervisors	(PWD)	Yes X	No 0

Data is unavailable for new hires at the management level.

SES: There were 3 vacancy announcements. There were 28 qualified applicants. 22 (78.57%) identified as no disability, 2 (7.14%) identified as PWD, and 4 (14.29%) chose not to identify. There were 3 selections, 3 no disability, 0 PWD, and none chose not to identify.

There were 45 vacancy announcements. Collectively there were 687 qualified applicants. Supervisor new hires are not broken down by grade level. There were 486 (70.74%) identified as no disability, 113 (16.45%) identified as PWD, and 88 (12.81) did not identify. There were 22 selections, 17 (77.27%) no disability, 2 (9.09%) PWD, and 3 (13.64%) chose not to identify.

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.

New hires for executives	(PWTD)	Yes X	No 0
New hires for managers	(PWTD)	Yes 0	No 0
New hires for supervisors	(PWTD)	Yes X	No 0

Data is unavailable for new hires at the management level.

Executive new hires are not broken down by grade level. Collectively there were 28 qualified applicants. 22 (19.40%) identified as no disability, 1 (3.57%) identified as PWTD, and 4 (14.29) did not identify. There were 3 selections, 3 no disability (100%), 0 PWTD, and none chose not to identify.

Supervisor new hires are not broken down by grade level. Collectively there were 687 qualified applicants. 486 (70.74%) identified as no disability, 50 (7.28%) identified as PWTD, and 88 (12.81) did not identify. There were 22 selections, 17 (77.27%) no disability, 0 PWTD, and 3 (13.64%) chose not to identify.

## Section V: Plan to Improve Retention of Persons with Disabilities

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

### Voluntary and Involuntary Separations

In this reporting period, did the agency convert all eligible Schedule A employees with a disability into 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 0      N/A X

Under the Defense Civilian Intelligence Program (DCIPS) personnel system, DCSA is an excepted service and the Agency lacks Schedule A authority. Conversion to competitive service is N/A.

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.

Voluntary separations (PWD)	Yes X	No 0
Involuntary separations (PWD)	Yes 0	No X

For voluntary separations, the inclusion rate for PWD is 15.65% which is higher than the inclusion rate for persons with no disabilities, 11.50%.

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.

Voluntary separations (PWTD)	Yes X	No 0
Involuntary separations (PWTD)	Yes X	No 0

For voluntary separations, the inclusion rate for PWTD is 16.35%, which is higher than the inclusion rate for persons with no disabilities, 11.50%.

For involuntary separations, the inclusion rate for PWTD is 2.88%, which is higher than the inclusion rate for persons with no disabilities, .42%.

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*.

Though DCSA employs exit surveys, such surveys are a voluntary tool, and all information provided on those surveys is wholly voluntary. During FY25, there were 657 voluntarily separations, and 27 involuntarily separated from the agency. There were 143 voluntary responses to the FY25 exit survey (0.21% response rate), of which 17 (0.12%) declined to identify, 94 (0.66%) identified as not being disabled, and 32 (0.22%) affirmed having disabilities. No further data can be conferred at this time.

### **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.

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.

<http://www.dcsa.mil/accessibility/>

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.

<http://www.dcsa.mil/accessibility/>

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

DCSA has implemented several compliance studies throughout the previous FYs, and those studies supported implementation of a robust program of risk identification and mitigation, expeditious corrective action, and continuous monitoring that directly improve the ADA and 508 compliance needs of its population. The program oversight mechanisms are in place to monitor accessibility compliance across agency facilities and digital platforms.

DCSA's Compliance Branch is represented at the monthly 508 Working Group Meetings.

## **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.

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

Because of the increased volume of accommodation requests associated with Agency return-to-office initiatives and evolving workplace requirements, processing timelines may vary depending on the complexity of the request, the need for supporting medical documentation, and procurement or validation of assistive technology or equipment. When appropriate, interim accommodation may be provided to support employees while additional documentation or resources are being reviewed and evaluated.

The Agency remains committed to processing requests as expeditiously as possible while ensuring compliance with applicable regulatory standards and maintaining the integrity of the interactive process. Current average case processing time is approximately 80 days, and timelines may extend for cases requiring additional documentation, medical review, or equipment procurement. The Agency continues to evaluate programs capacity, resourcing, and workflow processes to address increased demand while ensuring timely and equitable consideration of all accommodation requests.

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.

During FY 2025, DCSA processed more than 442 RA requests through its centralized case management system, Entellitrak, demonstrating the Agency's capacity to respond to increased demand following the implementation of the Return to Office (RTO) EO. This surge in requests reflects both the workforce's reentry dynamics and increased awareness of accommodation resources. To meet these needs, DCSA invested approximately \$21,000 in accommodation equipment and leveraged an additional \$7,936 through the DoW Computer/Electronic Accommodations Program (CAP), directly enabling employees to perform essential job functions and maintain productivity.

OEEO continues the use of Entellitrak as a case management platform which delivers real-time tracking, enhanced data visibility, and streamlined reporting, allowing leadership to make informed decisions and monitor compliance with Federal accessibility requirements.

In partnership with the Safety and Occupational Health Office, the integration of expert-led

ergonomic assessments further strengthened individualized support. Collectively, these efforts reduced administrative barriers, and improved response times, reinforcing operational readiness and mission continuity.

DCSA also sustained comprehensive accessibility support through contracted American Sign Language (ASL) services, which were utilized during 26 agency-wide events, 39 individual employee support engagements, and various background investigation interviews supporting mission-critical operations. These services ensured equitable access to information and participation across the workforce, directly contributing to employee engagement and performance.

In addition, DCSA conducted Architectural Barrier Studies and accessibility reviews across facilities and common areas enterprise wide. These assessments led to the resolution of previously identified deficiencies and the implementation of improvements such as enhanced shared spaces, lactation rooms, and wellness areas. These upgrades not only ensured compliance with accessibility standards but also promoted an inclusive workplace environment that supports employee well-being, retention, and long-term organizational effectiveness.

### **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.

PAS procedures are incorporated in the revised DCSA RA policy. PAS requests are processed in the same manner as RA requests. In FY 2025, DCSA did not receive any PAS requests.

## Section VI: EEO Complaint and Findings Data

### EEO Complaint Data Involving Harassment

During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the government-wide average?

Yes 0      No X      N/A 0

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

Yes 0      No X      N/A 0

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

N/A

### EEO Complaint Data Involving Reasonable Accommodation

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

Yes 0      No X      N/A 0

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

Yes 0      No X      N/A 0

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

N/A

## Section VII: Identification and Removal of Barriers

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

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

Yes 0      No X      N/A 0

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

Yes 0      No X      N/A 0

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

<b>Trigger 1</b>	The percentage of internal applications from PWD and PWTD appears higher than PWD and PWTD representation in Internal Selections.	
<b>Barrier(s)</b>	More data is needed on the experience of Internal Competitive Promotions to Senior Grade Levels.	
<b>Objective(s)</b>	DCSA contracted with Ruiz Strategies to assist with the barrier analysis during FY 2025.	
<b>Responsible Official(s)</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>	
Office of Equal Employment Opportunity (OEEO) Human Capital Management Office (HCMO)		
<b>Barrier Analysis Process Completed? (Yes or No)</b>	<b>Barrier(s) Identified? (Yes or No)</b>	
No	No	
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	Workforce data tables reveal internal applications from PWD and PWTD at the GG-13 through GG-15 grade to be higher than the selection rate at those grade levels. Review of the data tables also reveals there is a large portion of applicants that chose not to "self-identify" their disability status.
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, anti-harassment processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	

Other (Please Describe)		N/A		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
08/2024	Work with Ruiz Strategies to identify specific objectives, strategies, and action steps to complete barrier analysis.			
09/2024	Develop action plan based on results.			
08/2025	Work with HCMO to identify specific objectives, strategies and next steps.			
09/2025	Review outcome and develop action plan.			
Fiscal Year	Accomplishments			
	N/A			

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

DCSA discontinued the contracting relationship with Ruiz Strategies before the barrier analysis was complete. Contractor personnel, in conjunction with Agency representatives, lacked sufficient time to complete a barrier analysis.

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

N/A

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.

N/A

<b>Trigger 2</b>	PWD are voluntarily departing the Agency at a higher rate than persons with no disability.		
<b>Barrier(s)</b>	More data is needed to determine if the higher rate of voluntary separations is the result of a barrier.		
<b>Objective(s)</b>	DCSA contracted with Ruiz Strategies to assist with the barrier analysis during FY 2025.		
<b>Responsible Official(s)</b>			<b>Performance Standards Address the Plan? (Yes or No)</b>
Office of Equal Employment Opportunity (OEEO) Human Capital Management Office (HCMO)			

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	The inclusion rate for PWD is 11.89%, which is higher than the inclusion rate for persons with no disability, 7.98 %.  The inclusion rate for PWTD is 14.01%, which is higher than the inclusion rate for persons with no disability, 7.98%.		
Complaint Data (Trends)	No			
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	N/A			
Target Date (mm/dd/yy yy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy )	Completion Date (mm/dd/yyyy)
08/2024	Work with Ruiz Strategies to identify specific objectives, strategies, and action steps to complete barrier analysis.		08/2025	
09/2024	Develop action plan based on results.			
05/2025	Review exit interview data			
08/2025	Work with HCMO to identify specific objectives, strategies and next steps.			

Fiscal Year	Accomplishments
	N/A

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

DCSA discontinued the contracting relationship with Ruiz Strategies before the barrier analysis was complete. Contractor personnel, in conjunction with Agency representatives, lacked sufficient time to complete a barrier analysis.

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

N/A

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.

N/A

### Supporting Documents:

Documents	Yes/No	Comments
Organizational Chart	Yes	Appendix A
EEO Policy Statement	Yes	Appendix B
DCSA Strategic Plan	Yes	Appendix C
Alternative Dispute Resolution Procedures	Yes	Appendix D
Anti-Harassment Policy and Procedures	Yes	Appendix E
Reasonable Accommodation Procedures	Yes	Appendix F
Personal Assistance Services Procedures	Yes	Appendix G

#### DCSA Organization Chart-HQ



DCSA Components  
Leadership Org Cha

[Annual Statement on Equal Employment Opportunity\(1\).pdf](#)

[DCSA Strategic Plan FY22-FY27](#)

[https://dod365.sharepoint-mil.us/sites/DCSA-CSO/\\_layouts/15/viewer.aspx?sourcedoc={d37596d5-e8f3-4e2f-87e0-6f4409df6255}](https://dod365.sharepoint-mil.us/sites/DCSA-CSO/_layouts/15/viewer.aspx?sourcedoc={d37596d5-e8f3-4e2f-87e0-6f4409df6255})

[Alternative Dispute Resolution.pdf](#)

[Workplace Harassment Prevention and Response.pdf](#)

[Reasonable Accommodation Program.pdf](#)

[Personal Assistance Services.pdf](#)