

# Management Directive 715 | 2024

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



DEFENSE COUNTERINTELLIGENCE SECURITY AGENCY  
QUANTICO, VA 22134

# Table of Contents

Parts A–D:	Agency Information	3
Part E:	Executive Summary	5
Part F:	Certification	14
Part G:	Agency Self-Assessment Checklist	15
Part H:	Model EEO Program Plan	31
Part J:	Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities	38

---

## 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	5517	0	N/A	5517

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

Agency Leadership	Name	Title
Head of Agency	Mr. David Cattler	Director
Head of Agency Designee	Ms. Ellen M. Ardrey	Chief of Staff

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

EEO PROGRAM OFFICIALS	NAME	TITLE
Principal EEO Director	Ms. Rita Bhanot	Equal Employment Opportunity (EEO) Director
Deputy Director	Mr. Mohammed Kabir	Equal Employment Opportunity (EEO) Deputy Director
Title VII Affirmative EEO Program Official	Ms. Francine Williams	EEO Branch Chief
EEO Complaints Branch Chief	Dr. Carey Williams	EEO Complaints Branch Chief
EEO Complaint Processing Program Manager	Ms. Yolanda King	EEO Complaints Program Manager
EEO Compliance Branch Chief	Ms. Suhai Alston	EEO Compliance Branch Chief

Disability Program Manager	Ms. Lorraine Lupo	Disability Program Manager
Anti-Harassment Program Manager	Ms. Deana Rasnick	Chief Employee Relations, HCMO
ADR Program Manager	Ms. Yolanda King	EEO Complaints Program Manager
Principal MD-715 Preparer	Ms. Deirdre Garrett	EEO Specialist

## PART D.1 - LIST OF SUBORDINATE COMPONENTS COVERED IN THIS REPORT

Subordinate Components*	City	State	Country	CPDF Code	FIPS Code
-------------------------	------	-------	---------	-----------	-----------

Defense Counterintelligence and Security Agency (DCSA) does not have subordinate components.

## Part E: Executive Summary

### Part E.1

As the largest security Agency in the Federal Government, DCSA employs a workforce of 5,517 full-time, permanent employees. DCSA established a new regional field structure on October 1, 2021, merging existing field mission areas in a four-region structure that includes Central, Eastern, Mid-Atlantic, and Western jurisdictions. DCSA'S regional structure integrates our Agency's different missions and cultures into one cohesive organization and enhances cross-mission information sharing, prioritization coordination, and culture integration. DCSA provides personnel security services to more than 100 federal entities, oversees 10,000 cleared companies, and conducts approximately 2 million background investigations each year.

Our sustained commitment focuses on advancing the Agency's mission with due regard for civil rights and civil liberties. We are dedicated to fostering an organizational culture that fully embraces excellence and diligence. This commitment is demonstrated through reflective engagement that recognizes our distinct experiences, merits, and unique perspectives, all aimed at transforming the paradigm to achieve the goals set forth in DCSA's Strategic Plan. DCSA ensures all employees and applicants are treated fairly and in compliance with pertinent federal laws, executive orders, and DoD directives and policies relating to EEO.

The MD-715 was prepared in accordance with the U.S. Equal Employment Opportunity Commission regulations and Section 717 of the Civil Rights Act of 1964, as amended; the Reorganization Plan No. 1 of 1978; Executive Order 11748; and Section 501 of the Rehabilitation Act of 1973, as amended.

DCSA's FY 2024 Annual EEO Program Status Report highlights the progress made, and efforts taken to operate a sound EEO program, and notes areas for improvement.

### Mission

**DCSA's Mission:** Through vetting, industry engagement, education, counterintelligence and insider threat support, DCSA secures the trustworthiness of the U.S. Government's workforce, the integrity of its cleared contractor support, and the uncompromised nature of its technologies, services, and supply chains.

## EEO Program

The Office of Equal Employment Opportunity (OEEO) assists DCSA in promoting merit-based initiatives, excellence, and hard work that drives innovation and organizational outcomes for all employees and contributes to the agency's mission.

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

MD-715 outlines six essential elements that serve as the foundation for a model EEO program. As indicated on the scorecard below, DCSA is compliant with 160 out of 161 (99 percent) of the essential element measures listed in Part G.

EEO Essential Element	Measures	FY 2024 #	FY 2024 %
A. Demonstrated Commitment by Agency Leadership	16	16	100%
B. Integration of EEO into the Agency's Strategic Mission	40	40	100%
C. Management and Program Accountability	45	45	100%
D. Proactive Prevention of Unlawful Discrimination	14	14	100%
E. Efficiency	34	33	97%
F. Responsiveness and Legal Compliance	12	12	100%
<b>TOTAL</b>	<b>161</b>	<b>160</b>	<b>99%</b>

\*Measures listed as "Not Applicable" (N/A) are not counted during this rating period.

#### A. Demonstrated Commitment from DCSA Leadership

The Agency acknowledged its commitment to EEO during this reporting period with issuance of the EEO Strategic Plan, and publication of DCSA's annual EEO Policy Statement that states our commitment to the principles of equal employment opportunity and to a workplace free of unlawful discrimination, harassment, and retaliation. Existing policies and procedures are pending Agency review to ensure alignment with pertinent federal laws, new executive orders, and DoD directives and policies relating to Reasonable Accommodation (RA), Personal Assistance Services (PAS), EEO, Alternative Dispute Resolution (ADR), and anti-harassment. In accordance with the Notification and Federal Employee Anti-Discrimination and Retaliation (No FEAR) Act of 2002, DCSA ensures all employees, former employees and applicants are informed of their rights and remedies applicable to them under the employment and whistleblower protection laws.



All policies and instructions related to EEO, RA, and ADR are developed by the Office of Equal Employment Opportunity (OEEO) and distributed throughout the workforce via internal and external networks and various media platforms.

The OEEO is aligned under the Agency's Director, Mr. David Cattler, as part of DCSA's Special Staff. Our organizational placement enables direct lines of communication through scheduled briefings and periodic EEO program reviews with executives and senior leaders. This encourages a comprehensive organizational philosophy that consistently create new standards within DCSA.

During FY 2024, DCSA focused on improved execution of all statutory missions, sustained operations through town hall meetings each quarter, monthly workforce messages broadcast across the Agency which highlighted safety, protection of national security, Agency/regional realignment efforts, and increased attention on the core values and well-being of DCSA's workforce.

Under Director Cattler's leadership, DCSA's unremitting commitment to the principles of EEO is also understood with a new, spirited, Agency-wide Gatekeeper methodology, implemented to exercise fairness and respect through accountability and zero-tolerance for retaliation and behaviors misaligned with DCSA values. We promote equal treatment and ensure our actions and interactions are merit-based.

## B. Integration of EEO into the Agency's Strategic Mission

In FY 2024, the Agency established action plans based on goals outlined in the DCSA Strategic Plan with values focused on our commitment to mission, service, integrity, innovation, and investment in DCSA's people. The implementation of prioritized strategies shifted towards a more cohesive approach in meeting the elements outlined for a model EEO program.

Additionally, the Agency welcomed 876 new hires through the New Employee Experience (NEX), an onboarding program designed to effectively integrate our core values and optimize mission performance. The Director's Office, in collaboration with Human Capital Management Office (HCMO), hosted monthly brown bag sessions to promote open dialogue, motivation, engagement and increased awareness of EEO. In FY 2024, DCSA executive and senior leaders, visited several DCSA field sites and regional headquarters, to welcome new regional directors, realigned division leadership, management officials, and mission operations teams who work tirelessly in the defense of national security.

DCSA continues to comply with pertinent federal laws, executive orders, regulations and DoD directives and policies to ensure DCSA personnel and applicants have access to equal opportunities. Training is an essential tool for integration of EEO principles. During FY 2024, DCSA provided the following training to its workforce:

- Preventing Workplace Violence for Employees
- Preventing Workplace Violence for Managers and Supervisors
- No FEAR Act for Employees
- No FEAR Act for Managers and Supervisors
- Reasonable Accommodation
- Alternative Dispute Resolution (ADR)
- Everyone Communicates, Few Connect
- New Employee Orientation
- Anti-Harassment
- Conflict Management Strategies

Furthermore, the OEEO collaborated with HCMO to incorporate EEO presentations in the NEX for new hires, including EEO complaint processing, ADR, to further our focus on the pulse of the Agency, DCSA's Employee Council expanded membership to include the OEEO and individuals representing various operational missions and directorates.

### C. Management and Program Accountability

In compliance with MD-715, DCSA incorporated a structure of accountability and self-assessment to ensure we continue to apply the most effective management tools. The OEEO continues to highlight areas of growth and opportunities for improvement to leadership, quarterly.

During FY 2024, DCSA's OEEO updated all policies and published its first EEO Strategic Plan. With Agency-level support, the OEEO was realigned, creating a Complaints and Compliance Division, as the centralized processing center for managing requests for reasonable accommodations and equal employment opportunity complaints. OEEO focused on implementing new training approaches and metrics for impactful changes and sustained value in building and maintaining a Model EEO Program in DCSA.

The OEEO continued its collaborative efforts with HCMO on several initiatives and programs, including DCSA's Leadership Development Program (LDP), Career-Broadening Program, as well as joint-duty and detail assignments through FY 2024.

EEOC conducted a technical assistance visit (TAV) during FY 2024 to assess DCSA's EEO programs processes and records. The review included RA, EEO Complaints Compliance, and Agency-wide assessments. Following the TAV, EEOC provided recommendations for consideration. DCSA has initiated action plans for implementation of stated recommendations, as well as compliance with new executive orders and EEO policies for FY 2025.



## D. Proactive Prevention of Unlawful Discrimination

The fourth element of the model EEO program is proactive prevention of unlawful discrimination. DCSA ensures all employees are aware of the anti-discrimination policy and what protections the civil rights laws afford, including how to raise complaints in the EEO process or utilize ADR/mediation processes.

Awareness includes engagement between managers, supervisors, and employees to acknowledge issues when they arise, take allegations seriously, and working to resolve such issues through good faith efforts. DCSA offers ADR/mediation services as a tool to improve communication and/or restore workplace relationships and promotes management participation, as appropriate, to resolve issues at the lowest level. Participants also have an opportunity to provide anonymous feedback to assist the OEEO to improve delivery of such services.

## E. Efficiency

DCSA has consistently used a fair and impartial dispute resolution process with a record of expedited resolutions using an automated system to evaluate the timeliness and effectiveness of the program. Annually, DCSA maintains a report of complaints activities to identify, monitor and report current trends for all Americans. This ensures DCSA is meeting its obligations under Title VII of the 1964 Civil Rights Act and the Rehabilitation Act of 1973.

DCSA utilizes e-Complaints web-based case management tool for tracking EEO complaints, which provides real-time tracking and allows for prompt reporting. DCSA outsourced most of its EEO counseling services and trained EEO staff as counselors to ensure continuity of operations for EEO complaint processing, efficiency, timeliness, and to promote integrity of the process. DCSA's Compliance Division collaborated with contract EEO counselors to ensure quality, consistency, and compliance consistent with 29 CFR Part 1614 and EEOC Management Directive 110.

DCSA outsourced the ADR process and services to resolve workplace disputes as well as allegations of discrimination. The DoD Investigations and Resolutions Directorate, Diversity Management Operations Division oversees formal EEO complaint investigations.

HCMA acts as DCSA's liaison with the Defense Logistics Agency (DLA) to obtain needed data for employment and personnel related actions for all employees and applicants.

DCSA's Anti-Harassment policy was completed and distributed throughout the Agency and DCSA conducted training on the policy during its NEX (onboarding) throughout FY 2024.

## F. Responsiveness and Legal Compliance

DCSA has continued to comply with EEO statutes and EEOC regulations, policy guidance and written instructions to include EEOC orders and settlement agreements. The OEEC ensured leadership was apprised of issues that may have impacted the Agency's ability to comply with final agency decisions during scheduled meetings and reports outlining the status of all compliance actions and potential delays with senior and executive leaders. DCSA complies with Federal laws, executive orders, regulations, and DoD directives and policy guidance, and other instructions.

DCSA demonstrates a high degree of accountability and responsiveness with respect to findings of discrimination and compliance and has sufficient controls in place to ensure future compliance with mandated reporting requirements.

### Part E.3: Workforce Analysis

All DCSA employees are managed under the Defense Civilian Intelligence Personnel System (DCIPS), which is a Title 10, US Code, Excepted Service Hiring Authority. As such, at the conclusion of FY 2024, DCSA had a total permanent workforce of 5,517 employees, representing a growth rate of 8.44 percent from the previous year.

The MD-715 requires detailed analysis to determine whether any policies, procedures, or practices constitute a barrier to EEO for all employees and applicants. Triggers are indicators of a condition, disparity, or numeric anomaly warranting further inquiry and noted when comparing workforce statistics with an appropriate benchmark.

Assembled data used in this report references EEOC, DCSA, HCMO, and the DLA. The following is a summary of DCSA's analyses of the overall workforce participation, grade, major occupations, and representation of all employees.

#### A. Overall Workforce Participation

Workforce representation for agency employees is merit-based and listed below.<sup>1</sup>

#### Grade

The DCSA workforce is composed of 5,517 permanent employees in the DCIPS excepted service (GG) pay system, covering grades GG4 through GG15, and 43 Defense Intelligence Senior Executive Service (DISES) and Defense Intelligence Senior Level (DISL) employees. Fifty percent of DCSA's workforce are in mid-level

---

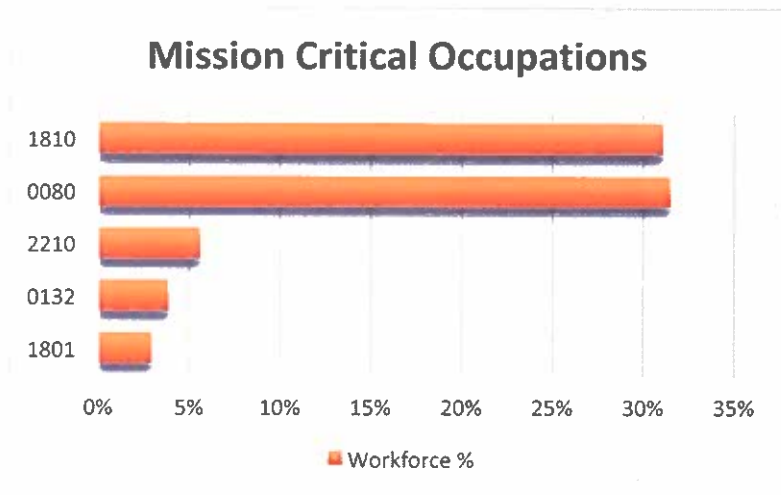
<sup>1</sup> According to Presidential Actions on Ending Illegal Discrimination and Restoring Merit-Based Opportunity, barrier analysis and other workforce data was removed.

positions, GG 9-12.

DCSA will conduct an in-depth review of hiring and separation data for mission-critical occupations to analyze trends.

### C. Mission Critical Occupations

DCSA's top five mission critical occupations series (MCOS) are General Investigation (1810) at 30% of the workforce; Security Administration (0080) at 31%; Information Technology Management (2210) at 6%; Intelligence (0132) at 4%; and General Inspection, Investigation, Enforcement, and Compliance (1801) at 3%. Together, these cover 74% of all DCSA positions.



**MCOS 1810** – There are 1,680 DCSA employees currently serving as general investigation/background investigators, occupying 30% of the workforce. All employees are represented at the GG-07 through GG-15 grade and Senior Executive Service (SES) levels, with the majority found at the GG-12 grade level. Sixty-four vacancy announcements were made for internal competitive promotions and external new hires. Of the 129 qualified internal applicants, there were 12 selections. There were 2,538 qualified external applicants for this series, and 96 selections.

**MCOS 0080** – There are 1,712 DCSA employees currently serving as security administration/specialists, occupying 31.03% of the workforce. All employees are represented at the GG-07 through GG-15 grade and Senior Executive Service (SES) levels, with the majority found at the GG-12 grade level. Twenty-one vacancy announcements were made for internal competitive promotions and external new hires. Of the 421 qualified internal applicants, there were 33 selections. There were 3,424 qualified external applicants for this series, and 111 selections.

**MCOS 2210** – There are 319 DCSA employees serving as information technology management/cybersecurity specialists, occupying 5.7% of the workforce. Twenty-nine vacancy announcements were made for external new hires and four announcements for internal competitive promotions. DCSA selected 37 external

applicants and 32 internal promotions for this series during FY 2024.

**MCOS 0132** – There are 202 DCSA employees serving as intelligence operations specialists, occupying 3.81% of DCSA's workforce. Thirty-two external vacancy announcements were made, and 4 internal competitive vacancy announcements were posted. Of the 1,214 qualified applicants for this series, there were 3 internal promotions and 25 external selections.

**MCOS 1801** – There are 156 DCSA employees serving as general inspection/investigation, enforcement, and compliance specialist, occupying just under 3% of DCSA's workforce. Eighty-eight percent of individuals working in general inspection/investigation, enforcement, and compliance are found at the GG12-14 grade levels. Seventeen vacancy announcements were made in FY 2024. Of the 37 qualified internal applicants, no one was selected. Of the 536 qualified external applicants, 13 external selections were made.

## D. Disability Workforce Trends

DCSA is committed to hiring persons based on merit and further recognizes the importance of ensuring individuals are provided opportunities to succeed in the workplace.

## EEO Complaints

DCSA proactively complies with EEO laws, policies, directives, and executive orders. DCSA continues to implement innovative concepts to ensure all DCSA personnel and applicants are afforded equal employment opportunities. DCSA measures the success of its EEO program against the six essential elements of a model EEO program, as outlined by EEOC MD-715.

DCSA offers mediation services as a tool to improve communication, restore workplace relationships and create win-win solutions. The Agency encouraged management participation, as appropriate to resolve issues at the lowest level. In FY 2024, the OEEO continued to advocate for participation in ADR by promoting benefits and best practices. The Office of EEO launched its ADR campaign aimed to educate the workforce to raise awareness of the Agency ADR program, proselytizing benefits of ADR participation, and updating Agency policies to foster great support from management officials. Despite increased resources and efforts by the Complaints team, ADR was offered to explore resolution of EEO claims for less than 25 percent of all EEO complaints processed in FY 2024.

During FY 2024, DCSA continued to proactively identify and remove physical, institutional, and attitudinal barriers to EEO. The DCSA Complaints and Compliance Division (CCD) was instrumental in de-escalating and resolving workplace disputes and conflicts through robust alternative dispute prevention and resolution. EEO

provided a neutral and fair forum for the discussion, investigation, adjudication, and resolution of EEO matters under 29 CFR 1614 and related executive orders. DCSA issued more than 20 final actions, with a 96% processing rate. The Agency achieved a 92% timely issuance of Final Agency Decisions (FAD) this evaluation period. There was a marked increase in FAD issuance to Complainants in FY 2024 as compared to FY 2023. Despite the challenges with EEO investigations across the Department of Defense, DCSA remained at 100% success rate in issuance of the notifications to the Complainant.

The DCSA designed a new automated EEO Complaints case management tool, aligned with 21<sup>st</sup> century technologies. The new e-processing tool allows employees to submit a request to enter the EEO Complaints process online through ServiceNOW platform. The interactive e-complaints database increased efficiency of EEO Complaints processing, case management and reporting. The new tracking tool provides real-time status of EEO complaints throughout their lifecycle. The tool provides on-demand, analysis of EEO cases, trend reports, and collections and consolidations of key data points supporting the completion of the annual EEOC 462 Report. In FY 2024, closed complaints contained multiple bases of discrimination; 71% of EEO cases alleged reprisal as a basis of discrimination; 80% alleged disability as a basis, and 25% alleged age (40 or above) as a basis of discrimination. The top three issues raised in FY 2024 EEO Complaints of discrimination were harassment (non-sexual), reasonable accommodations, assignment of duties, and disciplinary actions.

## Conclusion

DCSA remains committed to identifying and eliminating barriers that may impede equal opportunity. In FY 2025 and beyond, DCSA will continue to create a more dynamic, harmonious, and trusted workforce capable of meeting the demands and challenges deeper into the 21<sup>st</sup> century.



EEOC Form 715-01  
Part F

US Equal Opportunity Commission  
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 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 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

4/18/2025  
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


29 Apr 25  
Date








## Elements

 <b>Compliance Indicator</b>  <b>Measures</b>	<b>A.1 – The agency issues an effective, up to date EEO policy statement.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>A.1.a</b>	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "yes", please provide the annual issuance date in the comments column.	Yes	March 26, 2024
<b>A.1.b</b>	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation, and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces?	NA	Updates to EEO policy are pending Agency clearance for compliance with current executive orders.
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>A.2 – The agency has communicated EEO policies and procedures to all employees.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>A.2.a</b>	Does the agency disseminate the following policies and procedures to all employees?	Yes	
<b>A.2.a.1</b>	Anti-Harassment Policy?	Yes	
<b>A.2.a.2</b>	Reasonable Accommodation Procedures?	Yes	
<b>A.2.b</b>	Does the agency prominently post the following information throughout the workplace and on its public website?	Yes	
<b>A.2.b.1</b>	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director?	Yes	SEPM Programs are not operating at DCSA in compliance with current executive orders and DoD policy/issuances.
<b>A.2.b.2</b>	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process?	Yes	
<b>A.2.b.3</b>	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>  Note: Updates to internal and external webpages are pending Agency clearance for compliance with current executive orders.
<b>A.2.c</b>	Does the agency inform its employees about the following topics:		
<b>A.2.c.1</b>	EEO Complaint Process? If "yes", please provide how often.	Yes	EEO program topics are thoroughly covered throughout the year in a variety of formats, such as workforce messages, newsletters, brochures, the




			employee resource guide, Agency conferences/seminars, webinars, and new employee orientation.
<b>A.2.c.2</b>	ADR Process? If "yes", please provide how often.	Yes	EEO program topics are thoroughly covered throughout the year in a variety of formats, such as workforce messages, newsletters, brochures, the employee resource guide, Agency conferences/seminars, webinars, and new employee orientation.
<b>A.2.c.3</b>	Reasonable Accommodation Program? If "yes", please provide how often.	Yes	EEO program topics are thoroughly covered throughout the year in a variety of formats, such as workforce messages, newsletters, brochures, the employee resource guide, classroom training, Agency conferences/seminars, webinars, and new employee orientation.
<b>A.2.c.4</b>	Anti-Harassment Program? If "yes", please provide how often.	Yes	EEO program topics are thoroughly covered throughout the year in a variety of formats, such as workforce messages, newsletters, brochures, the employee resource guide, Agency conferences/seminars, webinars, and new employee orientation.
<b>A.2.c.5</b>	Behaviors that are inappropriate in the workplace and could result in disciplinary action? If "yes", please provide how often.	Yes	EEO program topics are thoroughly covered throughout the year in a variety of formats, such as workforce messages, newsletters, brochures, the employee resource guide, Agency conferences/seminars, webinars, and new employee orientation.
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>A.3 – The agency assesses and ensures EEO principles are part of its culture.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>A.3.a</b>	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? If "yes", provide one or two examples in the comments section.	Yes	Individual Special Act Awards and Agency award ceremonies.
<b>A.3.b</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?	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>B.1.a</b>	Is the agency head the immediate supervisor of the person ("EEO Director") who has day-to-day control over the EEO office?	Yes	

<b>B.1.a.1</b>	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If "yes," please provide the title of the agency head designee in the comments.	N/A	As an integral part of DCSA's mission, the EEO Director reports directly to the Agency Director.
<b>B.1.a.2</b>	Does the agency's organizational chart clearly define the reporting structure for the EEO office?	Yes	
<b>B.1.b</b>	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency, and legal compliance of the agency's EEO Program?	Yes	
<b>B.1.c</b>	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO Program and the status of the Barrier Analysis Process? If "yes", please provide the date of the briefing in the comment's column.	Yes	April 9, 2024
<b>B.1.d</b>	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/NA)</b>	<b>Comments</b>
<b>B.2.a</b>	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices?	Yes	
<b>B.2.b</b>	Is the EEO Director responsible for overseeing the completion of EEO counseling?	Yes	
<b>B.2.c</b>	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>B.2.d</b>	Is the EEO Director responsible for overseeing the timely issuing (FADs)?	Yes	
<b>B.2.e</b>	Is the EEO Director responsible for ensuring compliance with EEOC orders?	Yes	
<b>B.2.f</b>	Is the EEO Director responsible for periodically evaluating the entire EEO Program and providing recommendations for improvement to the agency head?	Yes	
<b>B.2.g</b>	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components?	N/A	No subordinate components.

 <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/NA)</b>	<b>Comments</b>
<b>B.3.a</b>	Do EEO Program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities?	Yes	
<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.	N/A	Updates to the Agency's strategic plan were finalized in compliance with current executive orders and DoD policy/issuances.
 <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/NA)</b>	<b>Comments</b>
<b>B.4.a</b>	Pursuant to 29 CFR § 1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO Program, for the following areas:	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?	N/A	Barrier analysis was removed in compliance with current executive orders and pending EEOC language updates.
<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>B.4.a.7</b>	To maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? If not, please identify the systems with insufficient funding in the comments	Yes	


	section.		
<b>B.4.a.8</b>	To effectively administer its Special Emphasis Programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)?	N/A	SEPM Programs were removed in compliance with current executive orders and DoD policy/issuances.
<b>B.4.a.9</b>	To effectively manage its Anti-Harassment Program?	Yes	
<b>B.4.a.10</b>	To effectively manage its reasonable accommodation program?	Yes	
<b>B.4.a.11</b>	To ensure timely and complete compliance with EEOC orders?	Yes	
<b>B.4.b</b>	Does the EEO office have a budget that is separate from other offices within the agency?	Yes	
<b>B.4.c</b>	Are the duties and responsibilities of EEO officials clearly defined?	Yes	
<b>B.4.d</b>	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II) (A) of MD-110?	Yes	
<b>B.4.e</b>	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II) (C) of MD-110?	Yes	
 <b>Compliance Indicator Measures</b>	<b>B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>B.5.a</b>	Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:		
<b>B.5.a.1</b>	EEO Complaint Process?	Yes	
<b>B.5.a.2</b>	Reasonable Accommodation Procedures?	Yes	
<b>B.5.a.3</b>	Anti-Harassment Policy?	Yes	
<b>B.5.a.4</b>	Supervisory, managerial, communication, and interpersonal skills to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications?	N/A	Supervisory and managerial training on communication and interpersonal skills is designed to aid all employees in compliance with current executive orders.
<b>B.5.a.5</b>	ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR.	Yes	











 <b>Compliance Indicator</b> <b>Measures</b>	<b>B.6 – The agency involves managers in the implementation of its EEO program.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>B.6.a</b>	Are senior managers involved in the implementation of Special Emphasis Programs?	N/A	SEPM Programs are not operating at DCSA in compliance with current executive orders and DoD policy/issuances.
<b>B.6.b</b>	Do senior managers participate in the barrier analysis process?	N/A	Barrier analysis was removed in compliance with current executive orders and pending EEOC language updates.
<b>B.6.c</b>	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)?	N/A	Barrier analysis was removed in compliance with current executive orders and pending EEOC language updates.
<b>B.6.d</b>	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans?	Yes	
 <b>Compliance Indicator</b> <b>Measures</b>	<b>C.1 – The agency conducts regular internal audits of its component and field offices.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>C.1.a</b>	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? If "yes", please provide the schedule for conducting audits in the comments section.	Yes	Unity of Effort Road Show, EEO Director touch point meetings with Agency head. EEO Chiefs have bi-weekly meetings with regional directors. Ad hoc meetings based on trend analysis.
<b>C.1.b</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	Unity of Effort Road Show, EEO Director touch point meetings with Agency head. EEO Chiefs have bi-weekly meetings with regional directors. Ad hoc meetings based on trend analysis.
<b>C.1.c</b>	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit?	Yes	Unity of Effort Road Show, EEO Director touch point meetings with Agency head. EEO Chiefs have bi-weekly meetings with regional directors. Ad hoc meetings based on trend analysis.
 <b>Compliance Indicator</b> <b>Measures</b>	<b>C.2 – The agency has established procedures to prevent all forms of EEO discrimination.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>C.2.a</b>	Has the agency established comprehensive Anti-Harassment Policy and Procedures that comply with EEOC's enforcement guidance?	Yes	Anti-Harassment Policy completed and distributed throughout the Agency. Training conducted during NEX onboarding.
<b>C.2.a.1</b>	Does the Anti-Harassment Policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment?	Yes	





<b>C.2.a.2</b>	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director?	Yes	
<b>C.2.a.3</b>	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations?	Yes	AHPM is made aware of all allegations of harassment (when anonymity is waived).
<b>C.2.a.4</b>	Does the agency ensure that the EEO office informs the Anti-Harassment Program of all EEO counseling activity alleging harassment?	Yes	The HCMO/ER office holds primary responsibility for anti-harassment complaints processing.
<b>C.2.a.5</b>	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? If "no", please provide the percentage of timely-processed inquiries in the comment column.	Yes	
<b>C.2.a.6</b>	Do the agency's training materials on its Anti-Harassment Policy include examples of disability-based harassment?	Yes	
<b>C.2.b</b>	Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance?	Yes	
<b>C.2.b.1</b>	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency?	Yes	
<b>C.2.b.2</b>	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director?	Yes	
<b>C.2.b.3</b>	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes?	Yes	
<b>C.2.b.4</b>	Do the Reasonable Accommodation Procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan?	Yes	
<b>C.2.b.5</b>	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.	Yes	
<b>C.2.c</b>	Has the agency established procedures for processing requests for Personal Assistance Services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards?	Yes	
<b>C.2.c.1</b>	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? If "yes", please provide the internet address in the	Yes	The PAS procedures are included in the Reasonable Accommodation Instruction. The instruction is posted on the public website.


	comment column.		<a href="#">EEO Regulation/Laws/Executive Order (dcsa.mil)</a>
 <b>Compliance Indicator</b> <b>Measures</b>	<b>C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>C.3.a</b>	Pursuant to 29 CFR §1614.102(a) (5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	Yes	
<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	
<b>C.3.b.3</b>	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation?	Yes	
<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?	N/A	Supervisory and managerial performance evaluations include an element on communication and interpersonal skills designed to aid all employees in compliance with current executive orders.
<b>C.3.b.5</b>	Provide religious accommodations when such accommodations do not cause an undue hardship?	Yes	
<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	
<b>C.3.b.9</b>	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority?	Yes	
<b>C.3.c</b>	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities?	Yes	
<b>C.3.d</b>	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/NA)</b>	<b>Comments</b>
<b>C.4.a</b>	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives?	Yes	
<b>C.4.b</b>	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups?	Yes	
<b>C.4.c</b>	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables?	Yes	
<b>C.4.d</b>	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	
<b>C.4.e</b>	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:		
<b>C.4.e.1</b>	Implement the Affirmative Action Plan for Individuals with Disabilities?	N/A	AAP updated in compliance with current executive orders and pending EEOC language updates.
<b>C.4.e.2</b>	Develop and/or conduct outreach and recruiting initiatives?	N/A	Outreach and recruitment efforts not being conducted in compliance with current executive orders and pending EEOC language updates.
<b>C.4.e.3</b>	Develop and/or provide training for managers and employees?	Yes	
<b>C.4.e.4</b>	Identify and remove barriers to equal opportunity in the workplace?	Yes	
<b>C.4.e.5</b>	Assist in preparing the MD-715 report?	Yes	
 <b>Compliance Indicator</b> <b>Measures</b>	<b>C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>C.5.a</b>	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct?	Yes	



<b>C.5.b</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	
<b>C.5.c</b>	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	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.6 – The EEO office advises managers/supervisors on EEO matters.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>C.6.a</b>	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	State of EEO/ Mission and Directorate Briefings.
<b>C.6.b</b>	Are EEO officials readily available to answer managers' and supervisors' questions or concerns?	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>D.1.a</b>	Does the agency have a process for identifying triggers in the workplace?	Yes	
<b>D.1.b</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	SEPMs and affinity groups are not operating at DCSA in compliance with current executive orders and DoD policy/issuances.
<b>D.1.c</b>	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities?	N/A	The DCSA Special Program Plan for the recruitment, hiring, advancement, and retention of individuals with disabilities was removed in compliance with current executive orders. The Agency is under a hiring freeze.
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>



<b>D.2.a</b>	Does the agency have a process for analyzing the identified triggers to find possible barriers?	Yes	
<b>D.2.b</b>	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability?	N/A	The impact of management/ personnel policies, procedures, and practices are examined for all employees in compliance with current executive orders.
<b>D.2.c</b>	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments?	N/A	The Agency considers all employees and applicants prior to making human resources decisions and in compliance with current executive orders.
<b>D.2.d</b>	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; anti-harassment program; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? If "yes", please identify the data sources in the comments column.	N/A	SEPMs and affinity groups were removed in compliance with current executive orders and DoD policy/issuances.
 <b>Compliance Indicator</b> <b>Measures</b>	<b>D.3 – The agency establishes appropriate action plans to remove identified barriers.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>D.3.a.</b>	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices?	Yes	
<b>D.3.b</b>	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities?	Yes	Barrier analysis was removed in compliance with current executive orders and pending EEOC language update.
<b>D.3.c</b>	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/NA)</b>	<b>Comments</b>
<b>D.4.a</b>	Does the agency post its affirmative action plan on its public website? Please provide the internet address in the comments.	N/A	DCSA is not posting an AAP in compliance with current executive orders and DoD policy/issuances.
<b>D.4.b</b>	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies?	N/A	The Agency takes steps to ensure all qualified Americans are aware of and encouraged to apply for job vacancies.
<b>D.4.c</b>	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly?	Yes	
<b>D.4.d</b>	Has the agency taken specific steps that are reasonably designed to increase the	N/A	The Agency takes steps to increase the number of all American






	number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals?		employees.
 <b>Compliance Indicator</b> <b>Measures</b>	<b>E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>E.1.a</b>	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Yes	
<b>E.1.b</b>	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Yes	
<b>E.1.c</b>	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(l)?	Yes	
<b>E.1.d</b>	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(l)? If so, please provide the average processing time in the comments.	Yes	Average processing time is 10-20 days.
<b>E.1.e</b>	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	Yes	
<b>E.1.f</b>	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	Yes	
<b>E.1.g</b>	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	Yes	
<b>E.1.h</b>	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)?	Yes	
<b>E.1.i</b>	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?	Yes	
<b>E.1.j</b>	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? If "yes", please describe how in the comment column.	Yes	Quarterly meetings are held with vendor to discuss areas requiring improvement. Suspense dates are identified for corrective action and follow-up meetings are conducted for status updates/closure of all identified issues.
<b>E.1.k</b>	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable	Yes	



	for poor work product and/or delays during performance review?		
<b>E.1.i</b>	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)?	Yes	
	<b>E.2 – The agency has a neutral EEO process.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>E.2.a</b>	Has the agency established a clear separation between its EEO complaint program and its defensive function? If "yes", please explain.	Yes	To ensure there is no perception of undue influence, OGC is not integrated into the EEO complaint process until case is docketed at the EEOC AJ hearing stage.  Note: OGC routinely engages in discussions prior to settlement meetings.
<b>E.2.b</b>	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? If "yes," please identify the source/location of the attorney who conducts the legal sufficiency review in the comment column.	Yes	The DCSA General Counsel appoints non-defense attorney to perform legal sufficiency reviews, as needed. Contract vendor provides legal sufficiency reviews of all final decisions.
<b>E.2.c</b>	If the EEO office relies on the agency's defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative?	Yes	
<b>E.2.d</b>	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions?	Yes	
<b>E.2.e</b>	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>E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>E.3.a</b>	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process?	Yes	
<b>E.3.b</b>	Does the agency require managers and supervisors to participate in ADR once it has been offered?	No	EEO ADR mediation is voluntary for all parties. Managers and supervisors are not required to participate in EEO ADR mediation, although ADR is encouraged to explore resolution.
<b>E.3.c</b>	Does the agency encourage all employees to use ADR, where ADR is appropriate?	Yes	Participation in ADR is encouraged. Managers and supervisors seek

			guidance from OGC to discuss when ADR is appropriate on a case-by-case basis.
<b>E.3.d</b>	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process?	Yes	
<b>E.3.e</b>	Does the agency prohibit the responsible management official named in the dispute from having settlement authority?	Yes	
<b>E.3.f</b>	Does the agency annually evaluate the effectiveness of its ADR program?	Yes	
 <b>Compliance Indicator</b> <b>Measures</b>	<b>E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>E.4.a</b>	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:	Yes	
<b>E.4.a.1</b>	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official?	Yes	
<b>E.4.a.2</b>	The race, national origin, sex, and disability status of agency employees?	N/A	The Agency has an effective and accurate data collection system in place to capture information for all employees and applicants in compliance with current executive orders and pending EEOC language.
<b>E.4.a.3</b>	Recruitment activities?	Yes	
<b>E.4.a.4</b>	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status?	N/A	External and internal applicant data is captured for all applicants in compliance with current executive orders and pending EEOC language.
<b>E.4.a.5</b>	The processing of requests for reasonable accommodation?	Yes	
<b>E.4.a.6</b>	The processing of complaints for the Anti-Harassment Program?	Yes	Anti-Harassment Program is housed in HCMO/ER.
<b>E.4.b</b>	Does the agency have a system in place to re-survey the workforce on a regular basis?	Yes	
 <b>Compliance Indicator</b> <b>Measures</b>	<b>E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>E.5.a</b>	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 conducted an analysis of higher-level positions (grades 13, 14, 15, and SES).
<b>E.5.b</b>	Does the agency review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? If "yes", provide an	Yes	DCSA participates in the intelligence community's regular council meetings where information and best practices are shared among the 18 IC

	example in the comments.		organizations.
<b>E.5.c</b>	Does the agency compare its performance in the EEO process to other federal agencies of similar size?	Yes	
 <b>Compliance Indicator</b> <b>Measures</b>	<b>F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>F.1.a</b>	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions?	Yes	
<b>F.1.b</b>	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements?	Yes	
<b>F.1.c</b>	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief?	Yes	
<b>F.1.d</b>	Are procedures in place to process other forms of ordered relief promptly?	Yes	
<b>F.1.e</b>	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review?	Yes	
 <b>Compliance Indicator</b> <b>Measures</b>	<b>F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>
<b>F.2.a</b>	Does the agency timely respond and fully comply with EEOC orders?	Yes	
<b>F.2.a.1</b>	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office?	Yes	
<b>F.2.a.2</b>	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief?	Yes	
<b>F.2.a.3</b>	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations?	Yes	
<b>F.2.a.4</b>	Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes	
 <b>Compliance Indicator</b> <b>Measures</b>	<b>F.3 - The agency reports to EEOC its program efforts and accomplishments.</b>	<b>Measure Met (Yes/No/NA)</b>	<b>Comments</b>

<b>F.3.a</b>	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report?	Yes	
<b>F.3.b</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

EEOC FORM 715-01 PART H	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
<b>Defense Counterintelligence and Security Agency</b>	<b>FY 2024</b>	
STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	Efficiency B.5.a.1 EEO Complaint Process	
OBJECTIVE:	Managers and supervisors will be trained in the Equal Employment Complaint process.	
RESPONSIBLE OFFICIAL:	Office of EEO Office of HCMO	
DATE OBJECTIVE INITIATED:	March 1, 2024	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2024	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)	
Office of EEO-Complaints collaborating with Human Resources to build online training (STEPP)	May 1, 2024	
Ensure student register to support tracking ability	July 8, 2024	
Have capability to obtain training data and assess training results	September 30, 2024	
<b>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:</b>  Conducted numerous trainings throughout the year for managers, supervisors, employees, and new hires to ensure awareness and comprehension of employee/managements rights and responsibilities as related to EEO complaints.  Worked with HCMO to obtain training data and improved the registration process for attendees.		



<b>Defense Counterintelligence and Security Agency</b>	<b>FY 2024</b>
STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	Efficiency B.5.a.2 Reasonable Accommodation Procedures
OBJECTIVE:	Managers and supervisors will be trained in the Reasonable Accommodation process.
RESPONSIBLE OFFICIAL:	OEEH HCOM
DATE OBJECTIVE INITIATED:	March 1, 2024
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2024
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
Office of EEO-Compliance collaborating with Human Resources to build online training (STEPP)	May 1, 2024
Ensure student register to support tracking ability	July 8, 2024
Have capability to obtain training data and assess training results	September 30, 2024
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:	
OEEH provided training to supervisors, managers, employees, and new hires, on the reasonable accommodation process.	
Worked with HCOM to obtain training data and registration process for attendees.	



EEOC FORM 715-01 PART H	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
<b>Defense Counterintelligence and Security Agency</b>	<b>FY 2024</b>	
STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	<b>Efficiency</b> B.5.a.3. Anti-Harassment Policy	
OBJECTIVE:	HCMO in partnership with OEEO will start training managers and supervisors on DCSA's Anti-Harassment Policy.	
RESPONSIBLE OFFICIAL:	OEEO HCMO	
DATE OBJECTIVE INITIATED:	March 1, 2024	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2024	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)	
Office of EEO - Compliance and Complaints Division to collaborate with Human Capital Management Office (HCMO) to build online training (STEPP)	May 1, 2024	
Ensure participant registration for tracking ability	July 8, 2024	
Have capability to obtain training data and assess training results	September 30, 2024	
<b>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:</b>  OEEO provided training to supervisors, managers, employees, and new hires, on the Anti-Harassment policy.  Worked with HCMO to obtain training data and registration process for attendees.		

EEOC FORM 715-01 PART H	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
<b>Defense Counterintelligence and Security Agency</b>	<b>FY 2024</b>	
STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	<b>Efficiency</b> 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	
OBJECTIVE:	OEEEO will continue to train managers and supervisor on DCSA's ADR policy and benefits associated with it.	
RESPONSIBLE OFFICIAL:	OEEEO HCMO	
DATE OBJECTIVE INITIATED:	March 1, 2024	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2025	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)	
Office of EEO-Complaints collaborating with Human Resources Management Office to build online training (STEPP)	May 1, 2025	
Ensure student register to support tracking ability	July 8, 2025	
Have capability to obtain training data and assess training results	September 30, 2025	
Managers, supervisors, employees and new hires to ensure all understand the process and benefits of ADR.	September 30, 2025	
<b>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:</b>  <i>Partially met.</i> Training conducted for managers, supervisors, employees and new hires during FY 2024. Will continue working through issues in FY 2025.		

EEOC FORM 715-01 PART H	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
<b>Defense Counterintelligence and Security Agency</b>	<b>FY 2024</b>	
STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	<b>Efficiency</b> E.3.b Does the Agency require managers and supervisors to participate in ADR once it has been offered	
OBJECTIVE:	DCSA will collaborate with Office of General Counsel to require managers or supervisors to participate in ADR if the other party wants to pursue this process.	
RESPONSIBLE OFFICIAL:	OEEO Office of General Council	
DATE OBJECTIVE INITIATED:	February 2024	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 2025	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:		
Office of EEO-Complaints to collaborate with Office of General Counsel to promote use of ADR to resolve workplace issues at the lowest level; in line with current ADR Policy.	May 2025	
Incorporate new policy or process in ADR training for supervisor/managers	September 2025	
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:  Ongoing through 2025.		

## Report of Accomplishments

Fiscal Year	Accomplishments
<b>FY 2024</b>	<ol style="list-style-type: none"> <li>1 DCSA's Equal Employment Opportunity Strategic Plan for Fiscal Years 2024-2028 was published in FY 2024. The strategic plan provides a framework through which DCSA can create and sustain a competent, multifaceted workforce. The purpose of DCSA's first EEO Strategic Plan is to advance and drive the principles of EEO across every continuum within DCSA to create a lasting and prevalent transformation of understanding and acceptance deeper into the 21st century. As implementation begins in FY 2024, action and communication plans will reinforce leadership's commitment to EEO in program structure and governance.</li> <li>2 DCSA transitioned to a centralized processing center for reasonable accommodation requests and Equal Employment Opportunity complaints processing due to restructure of resources. This change in processes ensures timely responses to DCSA staff from subject matter experts.</li> <li>3 Approximately 200 requests for reasonable accommodations were processed in FY 2024. The average processing time for routine requests averaged 10 business days. This number escalated near the end of FY2024 with the summons to return to the office in FY 2025.</li> <li>4 DCSA utilizes automated system Entellitrak, a web-based case management tool for tracking reasonable accommodation requests. This tool will provide real-time tracking and allows for prompt reporting and case management.</li> <li>5 Approximately \$12,200 was utilized for the purchase of equipment through the reasonable accommodation program. The items included: stand-up desks, ergonomic equipment, and ergonomic chairs, etc.</li> <li>6 DCSA's reasonable accommodation team partnered with the Safety &amp; Occupational Health team to provide ergonomic assessments. The assessments provided helpful information on how to utilize the standard ergonomic chair issued to employees. They also provided recommendations on correct body posture, lumbar support, foot support, and correct line of site for monitors.</li> <li>7 Approximately 15 Architectural Barriers Studies were conducted at DCSA facilities to ensure compliance. In addition, DCSA conducted accessibility reviews of common area spaces to include lactation lounges and wellness spaces.</li> </ol>

	<p>8 DCSA welcomed new hires through the New Employee Experience (NEX), a virtual onboarding program designed to effectively sustain a competent multifaceted workforce and optimize mission performance. The OEEO provides EEO Complaint Processing, Alternative Dispute Resolution (ADR), Prevention of Sexual and Workplace Harassment, Reasonable Accommodation, and the No FEAR Act of 2002 training.</p> <p>9 Using consistent communication with the workforce, reasonable accommodation articles were published in OEEO's newsletter, and all policies/practices regarding reasonable accommodation were announced to the workforce via internal communications channels such as through intranet, Chief of Staff network, Teams channels and training opportunities.</p> <p>10 In FY 2024, the OEEO expanded training offerings of EEO and Reasonable Accommodation to DCSA senior leaders, managers, supervisors, and staff at all levels in the organization.</p> <p>11 DCSA continued its EEO training contract agreement for compliance. This availability further equipped DCSA employees with knowledge, skills, and essential tools to drive change and improve accountability through participation in EEO-related briefings. Additionally, throughout the reporting cycle, the OEEO conducted a vast number of virtual and in-person training sessions with DCSA staff. Topics included but were not limited to the New Employee Experience (NEX), Civil Treatment in the Workplace, Communication, Team Building, Conflict Management Strategies, and the Prevention of Workplace Harassment.</p> <p>12 The Office of EEO conducted in-person and virtual EEO training sessions, collaborations with HCMO, and serving as subject matter experts in the delivery of regional EEO related information.</p> <p>13 The Office of EEO continues to provide EEO training and action plans to regional directors and Agency senior leadership each quarter. Quarterly reviews of available data with senior leadership, demonstrates DCSA's unequivocal commitment to equal opportunity for all employees and position DCSA as a premier organization.</p>
--	---



## 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

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

### Section I: Efforts to Reach Regulatory Goals

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

Using the goal of 12% as the benchmark, does your Agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

- |                               |       |      |
|-------------------------------|-------|------|
| ▪ Cluster GS-1 to GS-10 (PWD) | Yes 0 | No 0 |
| ▪ Cluster GS-11 to SES (PWD)  | Yes 0 | No 0 |

N/A

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

- |                                |       |      |
|--------------------------------|-------|------|
| ▪ Cluster GS-1 to GS-10 (PWTD) | Yes 0 | No 0 |
| ▪ Cluster GS-11 to SES (PWTD)  | Yes 0 | No 0 |

N/A

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

N/A

## 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 PWTD			1	Kim Kersey Branch Chief, Special Hiring Human Capital Management Office <a href="mailto:kimberly.i.kersey.civ@mail.mil">kimberly.i.kersey.civ@mail.mil</a>
Answering questions from the public about hiring authorities that take disability into account			1	Kim Kersey Branch Chief, Special Hiring Human Capital Management Office <a href="mailto:kimberly.i.kersey.civ@mail.mil">kimberly.i.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	3			Lori 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>  Natasha Stanton, Compliance Team Lead Office of Equal Employment Opportunity <a href="mailto:natasha.d.stanton.civ@mail.mil">natasha.d.stanton.civ@mail.mil</a> (July 2024-present)  Suzette Ward, EEO Specialist Office of Equal Employment Opportunity <b>(Departed DCSA July 2024)</b>  Joy Chontosh, EEO Specialist Office of Equal Employment Opportunity <a href="mailto:joy.m.chontosh.civ@mail.mil">joy.m.chontosh.civ@mail.mil</a>
Section 508 Compliance	1			Cpt. Liz Garza-Guidara, 508 Program Coordinator <a href="mailto:elizabeth.i.garzaguidara.civ@mail.mil">elizabeth.i.garzaguidara.civ@mail.mil</a>
Architectural Barriers Act Compliance	1			Lori Lupo, Disability Program 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				N/A

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

▪ Yes X No 0

The Agency engaged in training designed to increase the knowledge and skills among all program staff in compliance with pertinent federal laws, executive orders, and DoD directives and policies relating to EEO. Key staff attended, Conflict Resolution, ADR Lunchtime Series: Strengthening Social Connections and Building a Culture of Open Communication, EdCon Presents: Pregnant Workers Fairness Act, EEO Learning Community Webinar: A Conversation on Anti-Semitism & other Forms of Religious Discrimination, Foundations of Leadership, EEOC Training MD-715, Religious Accommodation presented by OPM, EEOC Latest Developments in RA Law, Leading from Where You Are, EEOC Excel Training Conference, Federal Dispute Resolution Training Conference, ADR Symposium and the Low Cost and High Impact of Accommodating Employees.

JAN Webcasts: Accommodation Solutions: Respiratory Conditions, Allergies, & fragrance Sensitivity, ADA and Beyond Compliance Considerations: Medical Documentation, Q&A: Sensory Team Edition, Accommodating Employees with Cognitive and Neurological Needs and Cognitive/Neurological Team Edition.

### 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.

N/A.

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.

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 Office of Human Capital Management Office (HCMO). HCMO replies to the individual advising where to find open positions and how to apply and that Schedule A does not apply.

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

• Yes X                      No 0                      N/A 0

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.

N/A.

### 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 0 |
| ▪ New Hires for Permanent Workforce (PWTD) | Yes 0 | No 0 |

N/A

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 0 | No 0 |
| ▪ New Hires for MCO (PWTD) | Yes 0 | No 0 |

N/A

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 |

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 0 | No 0 |
| ▪ Promotions for MCO (PWTD) | Yes 0 | No 0 |

N/A

## 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.

All eligible employees are considered, 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 with the goal of increasing their knowledge of reasonable accommodation. The training focused on the decision-makers role and responsibilities as well as those of the employee and of the compliance team. The goal of this training is to equip managers and supervisors with the tools and resources available for conducting the interactive process, coordinating with the reasonable accommodation team and effectively navigating through the reasonable accommodation process. The Compliance Team has noted a significant increase in participation since the third quarter of FY23 when the new training was offered.

### Career Development Opportunities

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

1. Intelligence Community Leadership Summit
2. DCSA Leadership Development Program (LDP)
3. Executive Leadership Development Program (ELDP)
4. Senior Executive Fellow, Harvard Kennedy School, National Security Fellowship Program
5. National Defense University College (NDU)
6. Defense Senior Leader Development Program (DSLDP)
7. Defense Civilian Emerging Leader Program
8. White House Leadership Development Program
9. Joint Duty Program and rotational assignments
10. 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 Programs	81	81				
Detail Programs	60	60				
Foundation of Leadership/ Leading from Where You Are	572	572				
Career Broadening Program	52	52				
Federal Executive Institute (Defense Senior Leader Program, Harvard Kennedy School, United States Army War college)	24	20				
Leadership Development Program	56	56				

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 0 |
| ▪ Selections (PWD) | Yes 0 | No 0 |

All applicants for career development opportunities are selected with supervisory approval. However, some also have course capacity numbers and registration is on a first come first serve basis.

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 0 |
| ▪ Selections (PWTD) | Yes 0 | No 0 |

All applicants for career development opportunities are selected with supervisory approval. However, some also have course capacity numbers and registration is on a first come first serve basis.

## 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 0 | No 0 |
| ▪ Awards, Bonuses, & Incentives (PWTD) | Yes 0 | No 0 |

N/A

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 0 |
| ▪ Pay increases (PWTD) | Yes 0 | No 0 |

N/A

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-GS 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 0 | No 0 |
| ▪ Internal selections (PWD)           | Yes 0 | No 0 |

#### Grade GS-15

- |                                       |       |      |
|---------------------------------------|-------|------|
| ▪ Qualified internal applicants (PWD) | Yes 0 | No 0 |
| ▪ Internal selections (PWD)           | Yes 0 | No 0 |

#### Grade GS-14

- |                                       |       |      |
|---------------------------------------|-------|------|
| ▪ Qualified internal applicants (PWD) | Yes 0 | No 0 |
| ▪ Internal selections (PWD)           | Yes 0 | No 0 |

#### Grade GS-13

- |                                       |       |      |
|---------------------------------------|-------|------|
| ▪ Qualified internal applicants (PWD) | Yes 0 | No 0 |
| ▪ Internal selections (PWD)           | Yes 0 | No 0 |

N/A



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

**\*SES**

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

**Grade GS-15**

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

**Grade GS-14**

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

**Grade GS-13**

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

N/A
-----

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

▪ New hires to SES	(PWD)	Yes 0	No 0
▪ New hires to GS-15	(PWD)	Yes 0	No 0
▪ New hires to GS-14	(PWD)	Yes 0	No 0
▪ New hires to GS-13	(PWD)	Yes 0	No 0

N/A
-----

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

▪ New hires to SES	(PWTD)	Yes 0	No 0
▪ New hires to GS-15	(PWTD)	Yes 0	No 0
▪ New hires to GS-14	(PWTD)	Yes 0	No 0
▪ New hires to GS-13	(PWTD)	Yes 0	No 0

N/A

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 0	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 0	No 0

N/A

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 0	No 0

N/A

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

N/A

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 0	No 0
▪ New hires for managers (PWTD)	Yes 0	No 0
▪ New hires for supervisors (PWTD)	Yes 0	No 0

N/A

## 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 the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If "no", please explain why the Agency did not convert all eligible Schedule A employees.

Yes 0      No 0      N/A X

Under the Defense Civilian Intelligence Program (DCIPS) personnel system, we are excepted service and do not have Schedule A authority.

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 0 | No 0 |
| ▪ Involuntary separations (PWD) | Yes 0 | No 0 |

N/A

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 0 | No 0 |
| ▪ Involuntary separations (PWTD) | Yes 0 | No 0 |

N/A

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*.

N/A

### 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.

Several Architectural Barriers studies were conducted at DCSA facilities. These studies assist the Agency in ensuring compliance and addressing areas that impose barriers.

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 accommodations, such as interpreting services.)

Reasonable accommodation requests are acted upon within three business days to ensure the interactive process is initiated, and the accommodation is provided as soon as possible factoring in time for ordering equipment and vetting assistive technology. When possible, an interim accommodation is put in place while awaiting additional documentation. Average case processing time is between 25 and 30 days, depending on the circumstances of the request.



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.

Approximately 200 requests for reasonable accommodation were processed in FY 2024.

DCSA utilizes automated system Entellitrak, a web-based case management tool for tracking reasonable accommodation requests. This tool provides real-time tracking and allows for prompt reporting and case management.

A total of approximately \$12,200 was utilized for the purchase of equipment through the reasonable accommodation program during FY 2024. The items included: stand-up desks, ergonomic equipment, and ergonomic chairs, etc.

The DoD Computer/Electronic Accommodations Program (CAP) was utilized to provide 60 reasonable accommodations. The cost savings to DCSA was approximately \$12,000.

The Compliance Branch instituted bi-weekly meetings with DCSA's logistics-based program offices to ensure timely fulfillment of items associated with reasonable accommodation requests.

DCSA's reasonable accommodation team partnered with the safety & occupational health team to provide ergonomic assessments. The assessments provided helpful information on how to utilize the standard ergonomic chair issued to employees. They also provided recommendations on correct body posture, lumbar support, foot support, and correct line of site for monitors.

DCSA provides American Sign Language (ASL) services through contract support. In FY 2024, ASL was provided during 26 events and 55 times to support hearing impaired employees. DCSA also provided this service for 2 background investigations to support mission critical work.

The Compliance Branch shared consistent communication with the workforce. Reasonable accommodation articles were published in the OEEEO newsletter, and all policies/practices regarding reasonable accommodation were announced to the workforce via internal communications channels such as through intranet, Chief of Staff Network, Teams channels and training opportunities.

DCSA's Compliance Branch offers quarterly reasonable accommodation training. The training sessions for managers/supervisors was developed with a

specific focus on the role of the first line supervisor in the reasonable accommodation effort. The employees training is intended to increase their knowledge of the reasonable accommodation process. Participation increased 30 percent during Fiscal Year 2024. All sessions are recorded for viewing later.

DCSA offers reasonable accommodations to applicants on all job postings. DCSA posts reasonable accommodation contact information for all events and uses close captioning online.

DCSA developed a 508 Working Group in FY 2024, the group meets monthly. Representation from program offices responsible for technology, training, human resources, equal opportunity, acquisitions and contracting and procurement participate. The mission of the working group is to ensure all users have equivalent access to information communication and communication technology that is developed, procured, maintained or used by federal agencies.

DCSA welcomes new hires through the New Employee Experience (NEX), a virtual onboarding program designed to effectively integrate workplace culture and optimize mission performance. The Office of Equal Employment Opportunity provides EEO Complaint Processing, Alternative Dispute Resolution (ADR), Prevention of Sexual and Workplace Harassment, Reasonable Accommodation, and the No FEAR Act of 2002 training. In FY 2024, DCSA offered 13 NEX sessions and trained a total of 968 employees.

### 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 reasonable accommodation policy. PAS requests are processed in the same manner as reasonable accommodation requests. In FY 2024, 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 0      N/A X

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

Yes 0      No 0      N/A X

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.