

(U) EEOC Form
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

(U) MD-715 - Part J Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

(U) 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.

(U) Section I: Efforts to Reach Regulatory Goals

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

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

a. (U) Cluster GS-1 to GS-10 (PWD)	Yes	X	No
b. (U) Cluster GS-11 to SES (PWD)	Yes	X	No

(U) EEOC Form
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

(U) The percentage of PWD in the GS-1 to GS-10 cluster is 0.0%. The percentage of PWD in the GS-11 to SES/SNIS cluster is 6.57%, which falls below the 12% benchmark.

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

a. (U) Cluster GS-1 to GS-10 (PWTD)	Yes	X	No
b. (U) Cluster GS-11 to SES (PWTD)	Yes	X	No
(U) The percentage of PWD in the GS-1 to GS-10 cluster is 0%. The percentage of PWD in the GS-11 to SES/SNIS cluster is 1.39%, which falls below the 2% benchmark.			

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

(U) The ODNI communicates goals to hiring managers and/or recruiters using: (1) briefings to senior leadership and component heads and (2) during diversity and inclusion discussions.

(U) EEOC Form
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

(U) Section II: Model Disability Program

(U) 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 RA program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

A. (U) Plan to Provide Sufficient & Competent Staffing for the Disability Program

1. (U) 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	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	0
(U) ODNI maintained a full staff of Disability Program Managers to support the workforce in FY 2022. In addition, there has been a continued focus on recruiting minority applicants and applicants with disabilities.				

(U) EEOC Form
 U.S. Equal Employment Opportunity Commission
 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

2. (U) 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	0	0	1	Melanie H. Chief, Workforce Benefits melanimh@ncic.gov
Answering questions from the public about hiring authorities that take disability into account	0	0	3	Daphne M. Chief, HR Recruitment daphne.martinez@dni.gov
Processing RA requests from applicants and employees	3	0	0	Faith P. Disability Program Manager faithhp@dni.gov
Section 508 Compliance	1	0	0	Eric K. Deputy CIO

Table below is U//FOUO.

(U) EEOC Form
 U.S. Equal Employment Opportunity Commission
 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

Architectural Barriers Act Compliance	1	0	0	ericmk@dni.gov Michael D. Deputy Director, Facilities michaad6@dni.gov
Special Emphasis Program for PWD and PWTD	0	0	1	Faith P. Disability Program Manager faithhp@dni.gov

3. (U) 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	<input checked="" type="checkbox"/>	No	0
(U) The RA, Disability Program Managers, attended the ODNI/EEOC Training – RA Process, Best Practices, Case Law Updates and Microsoft (MS) Document Accessibility Course. All new team members will attend the EEOC Disability Program Manager and Special Emphasis Program Manager courses, in addition to other EEOC offerings on the MD-715 basic, barrier analysis, disability program management, and refresher training. ODNI will also explore initiatives hosted by the National Employment Law Institute (NELI) covering the ADA and FMLA.			

B. (U) Plan to Ensure Sufficient Funding for the Disability Program

(U) 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	<input checked="" type="checkbox"/>	No	0
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(U) EEOC Form
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

(U) Section III: Plan to Recruit and Hire Individuals with Disabilities

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

A. (U) Plan to Identify Job Applicants with Disabilities

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

(U) As an initial matter, ODNI's FY 2021 Barrier Analysis examined barriers to recruitment and hiring of PWD and PWTD. Two of the identified barriers were 1) lack of an existing comprehensive recruitment plan and 2) lack of applicant flow data. COO/HRM in collaboration with COO/DIG are developing the first-ever ODNI Recruitment Strategy. As part of this process, an effort is underway to leverage the EDC to share best practices of existing DCO-level recruitment strategies for increasing recruitment of PWD and PWTD. The ODNI Recruitment

(U) EEOC Form
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

Strategy, currently in draft, will address overall ODNI recruitment efforts and the areas called out by the FY 2021 Barrier Analysis, including specific language and direction for the recruitment of PWD and PWTD.

(U) Further, as noted above, COO/HRM's transition to USAJobs will provide a mechanism for capturing and analyzing the applicant flow data of PWD and PWTD in mission-critical occupations and senior grades. As also described above, COO/HRM's Business Analytics Team, in partnership with COO/CIO, has developed POP 2.0, an internal system to further capture and refine applicant flow data, which will launch in Quarter 3 of FY 2023.

(U) Further, continued partnership with Wounded Warrior programs (and targeted engagement at Wounded Warrior national conferences) and the Federal Exchange on Employment & Disability provide opportunities for expanded recruitment among candidates with disabilities and with targeted disabilities, as well as insight into innovative approaches to recruiting PWD and PWTD to ODNI's mission areas. ODNI is also establishing relationships with organizations that specialize in assisting individuals with disabilities in securing and maintaining employment, such as America Job Centers, State Vocational Rehabilitation Agencies, the Veterans' Vocational Rehabilitation and Employment Program, and Employment Program, Centers for Independent Living, and Employment Network service providers. ODNI also continues to maintain alliances with the Access Board, the Job Accommodation Network, and equal opportunity publications, such as *Careers and the disABLED*, in order to promote awareness of ODNI's mission and opportunities.

2. (U) 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.

(U) ODNI's hiring process does not include a hiring authority permitting non-competitive appointment of qualified persons with disabilities. ODNI is committed to increasing the percentage of PWD and PWTD by focusing on the recruitment and retention of employees with disabilities and hiring them through the regular excepted service hiring process.

(U) EEOC Form
 U.S. Equal Employment Opportunity Commission
 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

3. (U) 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.

N/A

4. (U) 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	0	No	0	N/A	X
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B. (U) Plan to Establish Contacts with Disability Employment Organizations

(U) Describe the agency's efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

(U) As mentioned above, ODNI has a continued partnership with Wounded Warrior programs (and targeted engagement at Wounded Warrior national conferences) and the Federal Exchange on Employment & Disability. ODNI is also establishing relationships with organizations that specialize in assisting individuals with disabilities in securing and maintaining employment, such as America Job

(U) EEOC Form
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

Centers, State Vocational Rehabilitation Agencies, the Veterans' Vocational Rehabilitation and Employment Program, and Employment Program, Centers for Independent Living, and Employment Network service providers. ODNI also continues to maintain alliances with the Access Board, the Job Accommodation Network, and equal opportunity publications, such as *Careers and the disabled*, in order to promote awareness of ODNI's mission and opportunities. To continue strengthening partnerships with organizations that assist PWD and PWTDD secure and maintain employment, ODNI will include targeted recruitment initiatives in the ODNI Recruitment Strategy.

C. (U) Progression Towards Goals (Recruitment and Hiring)

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

a. (U) New Hires for Permanent Workforce (PWD)	Yes	X	No
b. (U) New Hires for Permanent Workforce (PWTDD)	Yes	X	No
(U) In FY 2022, the percentage of PWD among the new hires in the permanent workforce was 2.31% and 0.58% for PWTDD.			

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

(U) EEOC Form
 U.S. Equal Employment Opportunity Commission
 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

a. (U) New Hires for MCO (PWD)	Yes	No	N/A	X
b. (U) New Hires for MCO (PWTD)	Yes	No	N/A	X
Qualified applicant pool data is not currently available in HRM's data holdings.				

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

a. (U) Qualified Applicants for MCO (PWD)	Yes	X	No	N/A
b. (U) Qualified Applicants for MCO (PWTD)	Yes	X	No	N/A
(U) For the Intelligence Analysis MCO, 1.32% of the relevant applicant pool was PWD and 0.00% of qualified internal applicants were PWTD.				
(U) For the Mission Management MCO, 7.92% of the relevant applicant was PWD and 1.89% was PWTD, and 0.00% of qualified internal applicants were PWD or PWTD.				

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

a. (U) Promotions for MCO (PWD)	Yes	No	X
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(U) EEOC Form
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

b. (U) Promotions for MCO (PWTD)	Yes	No	X
(U) No triggers found.			

(U) Section IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities

(U) Pursuant to 29 C.F.R §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

A. (U) Advancement Program Plan

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

(U) EEOC Form
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

- (U) As discussed above, COO/DIG facilitated ODNI's FY 2021 Barrier Analysis, which examined the barriers of recruiting and hiring for applicants and personnel with disabilities and with targeted disabilities. Two of the identified barriers were 1) lack of an existing comprehensive recruitment plan, and 2) lack of applicant flow data. ODNI initiatives, including the forthcoming ODNI Recruitment Strategy, will address these issues by, among other efforts, including specific language and direction for the recruitment of PWD and PWTD and capturing and analyzing the applicant flow data of PWD and PWTD in mission-critical occupations and senior grades.
- (U) Further, as described in greater detail above, ODNI has also undertaken training and other programs to facilitate promotion of employees with disabilities and with targeted disabilities to senior grade levels; coordination with other organizations and IC elements regarding recruiting efforts and best practices; unconscious bias training for ODNI personnel in hiring and promotion roles; and disability-related training for managers and employees.
- (U) Finally, with respect to career development, the EDC has established an FY 2023 working group assisted by ODNI's American Veterans ERG (DAVERG), which has a significant PWD population. This group is conducting a year-long study on how to best leverage Veterans' contributions at ODNI and will provide advice to the EDC on the feasibility of setting aside vacancies (through the use of Veteran's Preference) and career developing training slots for PWD and PWTD.
- (U) Also, DAVERG is partnering with COO/HRM to help tailor a mentoring program with an emphasis on career advancement and retention.
- (U) Managers receive consistent messaging via senior leadership meetings about the use of RAs and workplace flexibilities to ensure every employee receives an equal opportunity to advance. Additionally, COO/HRM's new Supervisor & Manager Training Course includes modules on unconscious bias, empathy training, and detailed knowledge of supervisory and management responsibilities as they relate to the employment of PWD and PWTD.
- (U) ODNI also attempts to ensure all personnel are aware of available disability and accessibility resources. OEEEO, COO/DIG, and COO/HRM's RA Program conducts continuous outreach to ODNI's DCOs and often appears at component all-hands meetings to provide updates and answer questions. These offices were also featured in the November 2022 mandatory training for all employees.
- (U) ODNI also participated in both National Disability Employment Awareness Month which aims to help transform how PWD are perceived

(U) EEOC Form
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

and supported here at ODNI and to create a more inclusive and equitable culture.

(U) ODNI's Employees with Disabilities Employee Resource Group (EWG ERG) aims to support efforts to attract, hire, and retain a diverse workforce, with a particular emphasis on employees with disabilities, and to promote awareness of leadership and development opportunities to employees with disabilities.

(U) With respect to hiring and promotion, ODNI employees who serve on hiring panels and promotion boards are required to sign formal precepts, which affirm that discriminatory factors, such as disability, race, or sex, are not part of the decision-making process.

B. (U) Career Development Opportunities

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

(U) Competitive Learning Opportunity Program (CLOP) is a suite of annual professional development activities available to all permanent employees at ODNI. All employees are encouraged to formalize an Individual Development Plan with their supervisors, including a mix of internal and external training experiences as part of their professional development goals.

(U) ODNI offers detail assignments (external and internal), mentoring (circles and one-on-one), competitive learning opportunities (programs at institutions of higher education, military colleges, and think tanks), career development programs, foreign language training, scholarships to

(U) EEOC Form
 U.S. Equal Employment Opportunity Commission
 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

pursue studies in critical mission areas, and subject specific training (external and internal) to all employees.
 (U) ODNI continues to improve its tracking of participation in career development opportunities for PWD and PWTD.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	N/A	N/A				
Fellowship Programs	N/A	N/A	14.00%	28.57%	0.00%	0.00%
Mentoring Programs	N/A	N/A	8.30%	8.30%	3.32%	3.32%
Coaching Programs	N/A	N/A	N/A	N/A	N/A	N/A
Training Programs	N/A	N/A	N/A	N/A	N/A	N/A
Detail Programs	*	*	10.48%	4.76%	4.03%	1.59%
Other Career Development Programs	N/A	N/A	10.37%	10.37%	N/A	N/A

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(U) EEOC Form
 U.S. Equal Employment Opportunity Commission
 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

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

a. (U) Applicants (PWD)	Answer	N/A
b. (U) Selections (PWD)	Answer	N/A

(U) ODNI could not adequately track activity in this area. COO/HRM, in partnership with ODNI's COO/CIO has developed a new ODNI internal system, called POP 2.0, which will be responsible for capturing additional data, with an expected launch in Quarter 3 FY 2023.

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

a. (U) Applicants (PWTD)	Answer	N/A
b. (U) Selections (PWTD)	Answer	N/A

(U) ODNI could not adequately track activity in this area. COO/HRM, in partnership with ODNI's COO/CIO has developed a new ODNI internal system, called POP 2.0, which will be responsible for capturing additional data, with an expected launch in Quarter 3 of FY 2023.

C. (U) Awards

1. (U) 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.

(U) EEOC Form
 U.S. Equal Employment Opportunity Commission
 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

a. (U) Awards, Bonuses, & Incentives (PWD)	Answer: Yes
b. (U) Awards, Bonuses, & Incentives (PWTD)	Answer: Yes
(U) Time off awards 1-10 hours: PWD (5.88%), No Disability (9.87%)	
(U) Time off awards 11-20 hours: PWTD (0%), No Disability (11.37%)	
(U) Time off awards 21-30 hours: PWTD (0%), No Disability (4.26%)	
(U) Cash Awards 1000-1999: PWD (7.06%), PWTD (5.56%) No Disability (10.70%)	
(U) Cash Awards N/A	

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

a. (U) Pay Increases (PWD)	Answer: No
b. (U) Pay Increases (PWTD)	Answer: No

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

a. (U) Other Types of Recognition (PWD)	N/A, Non-Monetary Awards.
b. (U) Other Types of Recognition (PWTD)	N/A, Non-Monetary Awards.

(U) EEOC Form
 U.S. Equal Employment Opportunity Commission
 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

(U) ODNI defines Non-Monetary Awards (IPD 72.02d) as awards that recognize contributions above and beyond normal job requirements, but do not meet the requirements for monetary, honorary, special recognition, or time-off awards. The data for these awards are captured at different levels within the organization and not available for this report.

D. (U) Promotions

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

a. (U) SES

i. (U) Qualified Internal Applicants (PWD)	Yes	No	X
ii. (U) Internal Selections (PWD)	Yes	X	No
(U) PWD Representation for relevant applicant pool is 6.49%.			
(U) PWD Representation for Qualified Internal Applicants is 12.28%.			
(U) PWD Representation for Internal Selections is 0%.			

(U) EEOC Form
 U.S. Equal Employment Opportunity Commission
 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

b. (U) Grade GS-15

i. (U) Qualified Internal Applicants (PWD)	Yes	No	X
ii. (U) Internal Selections (PWD)	Yes	X	No
(U) PWD Representation for relevant applicant pool is 6.30%.			
(U) PWD Representation for Qualified Internal Applicants is 6.14%.			
(U) PWD Representation for Internal Selections is 0%.			

c. (U) Grade GS-14

i. (U) Qualified Internal Applicants (PWD)	Yes	No	X
ii. (U) Internal Selections (PWD)	Yes	No	X

d. (U) Grade GS-13

i. (U) Qualified Internal Applicants (PWD)	Yes	No	X
ii. (U) Internal Selections (PWD)	Yes	X	No
(U) PWD Representation for relevant applicant pool is 6.21%.			
(U) PWD Representation for Qualified Internal Applicants is 15.38%.			
(U) PWD Representation for Internal Selections is 12.50%.			

(U) EEOC Form
 U.S. Equal Employment Opportunity Commission
 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

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

a. (U) SES

i. (U) Qualified Internal Applicants (PWTD)	Yes	No	X
ii. (U) Internal Selections (PWTD)	Yes	X	No
(U) PWTD Representation for relevant applicant pool is 1.68%.			
(U) PWTD Representation for Qualified Internal Applicants is 5.26%.			
(U) PWTD Representation for Internal Selections is 0%.			

b. (U) Grade GS-15

i. (U) Qualified Internal Applicants (PWTD)	Yes	No	X
ii. (U) Internal Selections (PWTD)	Yes	X	No
(U) PWTD Representation for relevant applicant pool is 1.10%.			
(U) PWTD Representation for Qualified Internal Applicants is 2.63%.			
(U) PWTD Representation for Internal Selections is 0%.			

(U) EEOC Form
 U.S. Equal Employment Opportunity Commission
 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

c. (U) Grade GS-14

i. (U) Qualified Internal Applicants (PWTD)	No	X	No
ii. (U) Internal Selections (PWTD)	Yes	X	No
(U) PWTD Representation for relevant applicant pool is 1.39%.			
(U) PWTD Representation for Qualified Internal Applicants is 1.35%.			
(U) PWTD Representation for Internal Selections is 0%.			

d. (U) Grade GS-13

i. (U) Qualified Internal Applicants (PWTD)	Yes		No	X
ii. (U) Internal Selections (PWTD)	Yes	X	No	
(U) PWTD Representation for relevant applicant pool is 1.38%.				
(U) PWTD Representation for Qualified Internal Applicants is 2.56%.				
(U) PWTD Representation for Internal Selections is 0%.				

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

a. (U) New Hires to SES (PWD)	Answer:	N/A
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(U) EEOC Form
 U.S. Equal Employment Opportunity Commission
 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

b. (U) New Hires to GS-15 (PWD)	Answer:	N/A
c. (U) New Hires to GS-14 (PWD)	Answer:	N/A
d. (U) New Hires to GS-13 (PWD)	Answer:	N/A

(U) Qualified applicant pool data is not currently available in HRM's data holdings, but ODNI expects the transition to USAJobs will provide improved data collection.

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

a. (U) New Hires to SES (PWTD)	Answer:	N/A
b. (U) New Hires to GS-15 (PWTD)	Answer:	N/A
c. (U) New Hires to GS-14 (PWTD)	Answer:	N/A
d. (U) New Hires to GS-13 (PWTD)	Answer:	N/A

(U) Qualified applicant pool data is not currently available in HRM's data holdings, but ODNI expects the transition to USAJobs will provide improved data collection.

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

a. (U) Executives

(U) EEOC Form
 U.S. Equal Employment Opportunity Commission
 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

i. (U) Qualified Internal Applicants (PWD)	Yes	No	X
ii. (U) Internal Selections (PWD)	Yes	X	No
(U) PWD Representation for relevant applicant pool is 6.49%.			
(U) PWD Representation for Qualified Internal Applicants is 12.28%.			
(U) PWD Representation for Internal Selections is 0%.			

b. (U) Managers

i. (U) Qualified Internal Applicants (PWD)	Yes	No	X
ii. (U) Internal Selections (PWD)	Yes	No	X

c. (U) Supervisors

i. (U) Qualified Internal Applicants (PWD)	Yes	No	X
ii. (U) Internal Selections (PWD)	Yes	No	X

(U) EEOC Form
 U.S. Equal Employment Opportunity Commission
 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

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

a. (U) Executives

i. (U) Qualified Internal Applicants (PWTD)	Yes	No	X
ii. (U) Internal Selections (PWTD)	Yes	X	No
(U) PWTD Representation for relevant applicant pool is 1.68%.			
(U) PWTD Representation for Qualified Internal Applicants is 5.26%.			
(U) PWTD Representation for Internal Selections is 0%.			

b. (U) Managers

i. (U) Qualified Internal Applicants (PWTD)	Yes	No	X
ii. (U) Internal Selections (PWTD)	Yes	No	X

c. (U) Supervisors

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 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

i. (U) Qualified Internal Applicants (PWTD)	Yes	No	X
ii. (U) Internal Selections (PWTD)	Yes	No	X

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

a. (U) New Hires for Executives (PWD)	Answer: N/A
b. (U) New Hires for Managers (PWD)	Answer: N/A
c. (U) New Hires for Supervisors (PWD)	Answer: N/A
(U) Qualified applicant pool data is not currently available in HRM's data holdings, but ODNI expects the transition to USAJobs will provide improved data collection.	

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

a. (U) New Hires for Executives (PWTD)	Answer: N/A
b. (U) New Hires for Managers (PWTD)	Answer: N/A
c. (U) New Hires for Supervisors (PWTD)	Answer: N/A

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

(U) FY 2022 Management Directive-715

(U) Qualified applicant pool data is not currently available in HRM's data holdings, but ODNI expects the transition to USAJobs will provide improved data collection.

(U) Section V: Plan to Improve Retention of Persons with Disabilities

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

A. Voluntary and Involuntary Separations

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

(U) FY 2022 Management Directive-715

2. (U) Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If "yes", describe the trigger below.

a. (U) Voluntary Separations (PWD)	Yes	No	X
b. (U) Involuntary Separations (PWD)	Yes	No	X
The inclusion rates for separations for PWD, PWTD, and persons without disabilities are in the relevant data tables.			

3. (U) Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If "yes", describe the trigger below.

a. (U) Voluntary Separations (PWTD)	Yes	No	X
b. (U) Involuntary Separations (PWTD)	Yes	No	X
The inclusion rates for separations for PWD, PWTD, and persons without disabilities are in the relevant data tables.			

4. (U) 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*.

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

(U) FY 2022 Management Directive-715

B. (U) Accessibility of Technology and Facilities

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

1. (U) 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.

(U) Website: <https://www.dni.gov/index.php/accessibility>

2. (U) 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.

(U) ODNI's information on the Architectural Barriers Act and contact information can be found on ODNI's public website at: [https://www.dni.gov/index.php/accessibility#:~:text=Architectural%20Barriers%20Act%20of%201968&text=The%20Architectural%20Barriers%20Act%20\(ABA, responsible%20for%20enforcing%20the%20ABA.](https://www.dni.gov/index.php/accessibility#:~:text=Architectural%20Barriers%20Act%20of%201968&text=The%20Architectural%20Barriers%20Act%20(ABA, responsible%20for%20enforcing%20the%20ABA.)

3. (U) 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.

(U) ODNI's FY 2021 Barrier Analysis identified institutional/structural, attitudinal, and physical barriers to hiring, promotion, and retention for PWD and PWTD. In addition to efforts to address these barriers that were discussed above, the agency has focused on promotion and improving accessibility for PWD and PWTD within its workforce. To address these issues, ODNI's 2022 DEIA Strategic Plan prioritizes

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

(U) FY 2022 Management Directive-715

securing senior leader support for RAs and training for supervisors and managers that will foster a culture of accessibility. Among the Plan's objectives, ODNI aims to enhance understanding of the RA process, including through related training; fostering comprehensive awareness of IC and ODNI policies on accessibility; promoting awareness and the sharing of best practices for creating a culture of accessibility; and encouraging senior leaders, managers, and supervisor to champion efforts that promote accessibility. Specific actions to this end have included identifying potential training options, including through a contract for DEIA training with the American Management Association; updating security and Secure Compartmented Information Facility (SCIF) policies to embrace new adaptive technologies; and training supervisors on their responsibilities for safe workplaces.

(U) ODNI has focused on identifying time sensitivities and challenges associated with the RA Process and on streamlining the internal procedures associated with its new policy. COO/HRM's RA Portal was updated to implement tracking metrics, and going forward, the Portal will be able to track accommodation requests to ensure they are happening within the timeframe set forth in the RA guidelines.

(U) To complement these and other accessibility- and accommodation-related efforts, ODNI Civil Liberties, Privacy, and Transparency (CLPT) developed a communication plan to discuss how disability data is stored and used at ODNI for confidentiality purposes.

(U) ODNI continues to foster efforts and initiatives intended to improve retention of PWD. The EWD ERG has met with the PDDNI and the COO to discuss retention and other issues related to PWD and PWTd, including barriers to retention, accessibility to technology and facilities, and feedback on the RA Program. This feedback has since been incorporated in ongoing improvements in those areas.

(U) Further, as ODNI's 2022 DEIA Strategic Plan prioritizes accessibility, ODNI continues to provide training designed to expand awareness about disability and accessibility issues generally, and spearhead accessibility-related initiatives. For instance, ODNI supported the Deaf and Hard of Hearing IC Affinity Network's hearing device survey in FY 2022, which sought to better understand how possible challenges to accessibility, equity, and inclusion in the workplace, specifically with regard to the security approval process for hearing devices (i.e., hearing aids and cochlear implants).

(U) Finally, in FY 2023, the federal government will purchase the ODNI Liberty Crossing campus and ODNI is currently engaged in a comprehensive review of ADA compliance policies to identify areas that may require upgrades to increase accessibility throughout ODNI facilities.

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

(U) FY 2022 Management Directive-715

C. (U) RA Program

(U) 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, RA procedures.

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

(U) In FY 2022, ODNI was unable to track RA metrics that would provide the average time frame.

2. (U) Describe the effectiveness of the policies, procedures, or practices to implement the agency's RA 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.

(U//FOUO) Of 162 RA request cases in FY 2022, 108 required a determination. COO/HRM/RA verified that 98 of 108 cases that required a determination met the timeline requirement (91%). The 10 cases that did not meet the timeline requirement have sufficient reasoning as to why the timeline was not met.

(U) ODNI also attempts to ensure all personnel are aware of available disability and accessibility resources. OEEO, COO/DIG, and COO/HRM's RA Program conduct continuous outreach to ODNI's DCOs and often appear at component all-hands meetings to provide updates and answer questions. These offices were also featured in the November 2022 mandatory training for all employees. New ODNI employees also receive information at the Entry on Duty Orientation.

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

(U) FY 2022 Management Directive-715

D. (U) Personal Assistance Services Allowing Employees to Participate in the Workplace

(U) 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.

(U) 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.

(U//FOUO) There were no requests for PAS in FY 2022. COO/HRM/RA provides PAS training upon request for supervisors and managers.

(U) Section VI: EEO Complaint and Findings Data

A. (U) EEO Complaint data involving Harassment

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

(U) FY 2022 Management Directive-715

1. (U) 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?

No.

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

N/A

3. (U) 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

B. (U) EEO Complaint Data involving RA

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

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

(U) FY 2022 Management Directive-715

No.

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

N/A

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

N/A

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

(U) FY 2022 Management Directive-715

(U) Section VII: Identification and Removal of Barriers

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

1. (U) Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?
 (U) Answer: Yes. The FY 2022 Barrier Analysis identified barriers using the FY 2021 MD-715.
2. (U) Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD? Answer: Yes.
3. (U) Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments.

Trigger 1	The FY 2021 data review revealed triggers for the following areas: <ul style="list-style-type: none"> • PWD and PWTD by grade level cluster in the permanent workforce • PWD and PWTD new hires • PWD and PWTD promoted to mission-critical occupations • PWD and PWTD among promotions to all grade levels and supervisory positions • PWD and PWTD cash and time-off awards • PWD and PWTD voluntary separation rates
Barrier(s)	1. Potential Institutional/Structural Barriers <ol style="list-style-type: none"> a. The ODNI currently does not have a recruitment strategy, which results in a lack of focused/targeted recruiting at universities, schools, and organizations that focus on PWD. b. IC Applicant Gateway has resulted in a lack of applicant flow data, which limits access to applicant information such as how they heard about the positions or demographic information on applicants who were not hired.

Table below is UNCLASSIFIED.

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

(U) FY 2022 Management Directive-715

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	<ul style="list-style-type: none"> c. Despite ICD 503 Intelligence Community Information Technology Systems Security Risk Management, ICD 705 Sensitive Compartmented Information Facilities, and ES 2017-00043 content related to medical devices, employees believe ODNI facilities are not designed in a way that is accommodating for PWD, both physically and in terms of security. d. The MD-715 shows PWD and PWTd received awards and incentives at a lower proportion than persons with no disabilities in multiple categories (this may be due to numerous reasons, e.g., inconsistent interpretation of ODNI Instruction 72.02, unconscious bias). <p>2. Potential Attitudinal Barriers</p> <ul style="list-style-type: none"> a. Stigma around having a disability leading to discomfort disclosing disabilities. b. Belief that supervisors and managers do not know how to support PWD despite Section 508 RAs and ICPG 110.1 Employment of Individuals with Disabilities. c. Belief that care and treatment of disabilities and mental health may not be supported by ODNI. d. Belief that there is not adequate PWD representation in leadership positions. e. Belief that certain experiences (e.g., overseas assignments, a requirement in some agencies) are expected for promotion, which can limit opportunities for PWD. f. Belief that ODNI facilities are not designed in a way that is accommodating for PWD, both physically and in terms of security challenges due to security protocols. <p>3. Potential Physical Barriers</p> <ul style="list-style-type: none"> a. Not all ODNI restroom facilities are ADA compliant.
<p>Objective(s)</p>	<ul style="list-style-type: none"> 1. Develop a targeted recruitment plan for PWD. 2. Promote self-identification for PWD. 3. Expand supervisor and manager training on RAs, effective techniques to foster a more accessible environment, and empathy training to all employees. 4. Conduct a review of the award and incentive programs to ensure it is objective and consistent. 5. Establish a working group to update and review policies and directives related to medical devices.
<p>Responsible Official(s)</p>	<p>Performance Standards Address the Plan? (Yes or No)</p>

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FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

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Acting Chief, DIG, Dennis W.	Yes
Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
Yes	Yes

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 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

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Sources of Data		Sources Reviewed? (Yes or No)	Identify Information Collected	Completion Date (mm/dd/yyyy)
Complaint Data (Trends)		Yes		
Grievance Data (Trends)		Yes		
Workforce Data Tables		Yes		
Findings from Decisions (e.g., EEO, Grievance, MSPB, AH Processes)		Yes		
Climate Assessment Survey (e.g., FEVS)		Yes		
Exit Interview Data		No		
Focus Groups		Yes		
Interviews		Yes		
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)		Yes		
Other (Please Describe)		N/A		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2023	Focused/targeted recruiting at universities, schools, and organizations that focus on PWD.	Yes		
09/30/2023	Develop an online resource on ODNI's public website that includes links to the RA process, contact information to inquire about RA as an applicant, and new information, such as what to	Yes		

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

(U) FY 2022 Management Directive-715

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	expect in a polygraph examination.			
09/30/2023	Review ICD 705 SCIF physical and technical security requirements to increase accessibility.	Yes		
09/30/2023	Add recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities questions to the ODNI exit survey.	Yes		10/31/2022
09/30/2023	Develop a one-page information sheet and communication plan to share with all employees on how disability data is stored and used at ODNI for confidentiality purposes.	Yes		
09/30/2023	Provide targeted professional development opportunities for PWD employees via the ERGs.	Yes		10/21/2022
Fiscal Year		Accomplishments		
FY 2022	ODNI is continuing to work toward the Planned Activities listed above with a target completion date of 09/30/2023.			

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

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FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(U) FY 2022 Management Directive-715

(U) ODNI continues to work toward the Planned Activities listed above with a target completion date of 09/30/2023. To date, there does not appear to be any factors that will prevent ODNI from timely completion of the planned activities.

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

(U) The percentage of new hires with disabilities decreased from 5.61% in FY 2021 to 2.31% in FY 2022.
(U) For GS-13, the percentage of new hires with disabilities decreased from 6.52% to 1.79%. For GS-14, the percentage of new hires with disabilities remained about the same, changing from 3.75% to 3.64% from FY 2021 to FY 2022. For GS-15, the percentage of new hires with disabilities decreased from 10.34% to 0.00%. For SNIS, the percentage of new hires with disabilities remained the same at 0.00%.
(U) Note: the overall number of employees promoted to SES/SNIS in a typical year is exceedingly small, i.e., fewer than 10.
(U) The ODNI Recruitment Strategy that is under development along with Exit Survey questions relating to PWD and PWTD will help ODNI attract, recruit, hire, develop, and retain a skilled, diverse workforce with an emphasis on PWD and PWTD in FY 2023 and beyond.

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

(U) FY 2022 Management Directive-715

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

(U) The DIG will review activities quarterly and make continual adjustments toward improvement throughout FY 2023.