

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

**FY 2021 Management Directive-715**

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

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

Section I: Efforts to Reach Regulatory Goals

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

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

- |                                |             |
|--------------------------------|-------------|
| a. Cluster GS-1 to GS-10 (PWD) | Answer: Yes |
| b. Cluster GS-11 to SES (PWD)  | Answer: Yes |

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 6.65%, which falls below the 12% benchmark.

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

- |                                 |             |
|---------------------------------|-------------|
| a. Cluster GS-1 to GS-10 (PWTD) | Answer: Yes |
| b. Cluster GS-11 to SES (PWTD)  | Answer: No  |

The percentage of PWTD in the GS-1 to GS-10 cluster is 0%. The percentage of PWTD in the GS-11 to SES/SNIS cluster is 1.41%, which is within 1% of the 2% benchmark.

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

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.

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Section II: Model Disability Program

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

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

1. 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.

Answer: Yes. ODNI plans to further increase the staff that delivers disability services to the workforce in FY 2022. ODNI expanded its recruitment staff in FY 2021, with a focus on recruiting minority applicants and applicants with disabilities.

2. 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	Damarah R. Chief, HR Operations damarnr@dni.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 reasonable accommodation 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 ericmk@dni.gov
Architectural Barriers Act Compliance	1	0	0	Michael D. Deputy Director - Facilities michaad6@dni.gov

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Special Emphasis Program for PWD and PWTD	0	0	1	Faith P. Disability Program Manager faithhp@dni.gov
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3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If "yes", describe the training that disability program staff have received. If "no", describe the training planned for the upcoming year.

Answer: Yes. The Reasonable Accommodation, Disability Program Managers attended the EEOC Disability Program Manager and Special Emphasis Program Manager courses in addition to educational initiatives hosted by the National Employment Law Institute (NELI). COVID-19 pandemic curtailed plans to provide additional training to disability program staff. ODNI is working to identify and improve training opportunities for responsible officials, including EEOC offered courses on the MD-715 basic, barrier analysis, disability program management, and refresher training.

**B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM**

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

Answer: Yes.

Section III: Plan to Recruit and Hire Individuals with Disabilities

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

**A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES**

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

The ODNI partners with IC elements, institutions of higher education, and national level organizations focused on increasing employment opportunities for PWD and PWTD. Initiatives by the IC Human Capital to expand recruiting to non-traditional partners with higher demographic representation of PWD and PWTD will increase the opportunities to expose qualified candidates to the mission of the ODNI. Continued collaborations and partnerships with wounded warrior programs and targeted engagement at national level conferences, and the Federal Exchange on Employment & Disability provide insight into innovative approaches to recruiting PWD and PWTD to various mission areas within the ODNI.

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

ODNI does not execute a hiring process that includes a hiring authority that permits non-competitive appointment of qualified persons with disabilities. ODNI is committed to increasing the percentage of PWD/PWTD by focusing on the recruitment and retention of employees with disabilities and hiring them through the regular excepted service hiring process at ODNI.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority and (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

Answer: N/A

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

Answer: N/A

**B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS**

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

In addition to the partnerships and collaborations mentioned above, the ODNI maintains alliances with the Access Board, the Job Accommodation Network, and equal opportunity publications such as *Careers* and *the disABLED*. To continue strengthening partnerships with organizations that assist PWD and PWTD secure and maintain employment, the ODNI will include targeted recruitment initiatives, aligned to the ODNI Recruitment Strategy.

**C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)**

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

a. New Hires for Permanent Workforce (PWD)

Answer: Yes

b. New Hires for Permanent Workforce (PWTD)

Answer: Yes

In FY 2021, the percentage of PWD among the new hires in the permanent workforce was 5.61% and 0% for PWTD.



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

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

**A. ADVANCEMENT PROGRAM PLAN**

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

The ODNI Competitive Learning Opportunity Program (CLOP) is an annual leadership and professional development program available to ODNI permanent cadre employees only. This annual program is comprised of competitive and non-competitive leadership development programs for GS-12 up to SNIS (SES) permanent cadre employees.

Additionally, employees are encouraged to seek a wide variety of internal and external training and professional development opportunities as part of their leadership (skills) development. Further, selection officials for promotions are indoctrinated with precepts to ensure factors such as disability, race, or sex are eliminated from the decision making process.

In FY 2021, ODNI continued to use internal websites, workforce messages, and discussions with components to conduct outreach and awareness. Managers received consistent messaging via senior leadership group meetings about the use of reasonable accommodations and workplace flexibilities to ensure every employee received an equal opportunity to advance, particularly important due to the impact of the pandemic.

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**B. CAREER DEVELOPMENT OPPORTUNITIES**

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

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 pursue studies in critical mission areas, and subject specific training (external and internal).

ODNI continues to improve its tracking of participation in career development opportunities for PWD and PWTB.

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		PWTB	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	N/A	N/A	5.39%	5.39%	1.03%	1.03%
Fellowship Programs	N/A	N/A	12.5%	16.67%	0.00%	0.00%
Mentoring Programs	N/A	N/A	15.79%	15.79%	2.63%	2.63%
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	*	*	14.29%	9.09%	4.76%	0.00%
Other Career Development Programs	N/A	N/A	7.89%	7.89%	2.63%	2.63%

\* Counts of employees at ODNI are not provided due to classification requirements.

2. 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. Applicants (PWD) Answer: N/A

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b. Selections (PWD)

Answer: N/A

Overall, the pandemic limited opportunities for all ODNI officers to participate in career development and mentoring programs in FY 2021. While many employees worked from home and leveraged online training opportunities, ODNI could not adequately track activity in this area.

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

a. Applicants (PWTD)

Answer: N/A

b. Selections (PWTD)

Answer: N/A

Overall, the pandemic limited opportunities for all ODNI officers to participate in career development and mentoring programs in FY 2021. While many employees worked from home and leveraged online training opportunities, ODNI could not adequately track activity in this area.

**C. AWARDS**

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

a. Awards, Bonuses, & Incentives (PWD)

Answer: Yes

b. Awards, Bonuses, & Incentives (PWTD)

Answer: Yes

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There is one trigger for time-off awards for PWD compared to persons with no disability. For awards of 1-10 hours, the inclusion rate for PWD is 1.25% compared to 3.50% for persons with no disability.

There are triggers for PWD in three cash award categories. For the \$2,000-\$2,999 category, the inclusion rate for PWD is 8.75% compared to 13.49% for people with no disability. For the \$4,000-\$4,999 category, the inclusion rate for PWD is 5.00% compared to 12.52% for persons with no disability. The third category is \$5,000, in which the inclusion rate for PWD is 30.00% compared to 31.87% for persons with no disability.

For PWTD, there are triggers in two time-off award categories. For 1-10 hours, the inclusion rate for PWTD is 0.00% compared to 3.50% for persons with no disability. For 21-30 hours, the inclusion rate for PWTD is 0.00% compared to 1.31% for persons with no disability.

For PWTD, there are triggers in two cash award categories. In the \$2,000-\$2,999 category, the inclusion rate for PWTD is 5.88% compared to 13.49% for persons with no disability. In the \$4,000-\$4,999 category, the inclusion rate for PWTD is 5.88% compared to 12.52% for persons with no disability.

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If "yes", please describe the trigger(s) in the text box.
- a. Pay Increases (PWD) Answer: No
  - b. Pay Increases (PWTD) Answer: No

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If "yes", describe the employee recognition program and relevant data in the text box.
- a. Other Types of Recognition (PWD) Answer: Yes, Non-Monetary Awards.
  - b. Other Types of Recognition (PWTD) Answer: Yes, Non-Monetary Awards.

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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. PROMOTIONS**

1. Does your agency have a trigger involving PWD among the qualified *internal* applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.
  - a. SES
    - i. Qualified Internal Applicants (PWD)                      Answer: No
    - ii. Internal Selections (PWD)                                      Answer: Yes
  - b. Grade GS-15
    - i. Qualified Internal Applicants (PWD)                      Answer: No
    - ii. Internal Selections (PWD)                                      Answer: Yes
  - c. Grade GS-14
    - i. Qualified Internal Applicants (PWD)                      Answer: No
    - ii. Internal Selections (PWD)                                      Answer: Yes
  - d. Grade GS-13
    - i. Qualified Internal Applicants (PWD)                      Answer: No
    - ii. Internal Selections (PWD)                                      Answer: Yes



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For SES/SNIS promotions, there was a trigger such that PWTB made up 0.00% of internal selections yet made up 2.63% of qualified internal applicants.

For GS-15 promotions, there was a trigger such that PWTB made up 0.00% of internal selections yet made up 1.83% of qualified internal applicants.

For GS-14 promotions, there was a trigger such that PWTB made up 0.00% of qualified internal applicants yet made up 1.64% of the relevant applicant pool.

For GS-13 promotions, there was a trigger such that PWTB made up 0.00% of internal selections yet made up of 2.22% of qualified internal applicants.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.
- |                             |             |
|-----------------------------|-------------|
| a. New Hires to SES (PWD)   | Answer: N/A |
| b. New Hires to GS-15 (PWD) | Answer: N/A |
| c. New Hires to GS-14 (PWD) | Answer: N/A |
| d. New Hires to GS-13 (PWD) | Answer: N/A |

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

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.
- |                              |             |
|------------------------------|-------------|
| a. New Hires to SES (PWTB)   | Answer: N/A |
| b. New Hires to GS-15 (PWTB) | Answer: N/A |

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- |                              |             |
|------------------------------|-------------|
| c. New Hires to GS-14 (PWTD) | Answer: N/A |
| d. New Hires to GS-13 (PWTD) | Answer: N/A |

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

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.

- |  |             |
|--|-------------|
| e. Executives                          |             |
| i. Qualified Internal Applicants (PWD) | Answer: No  |
| ii. Internal Selections (PWD)          | Answer: Yes |
| f. Managers                            |             |
| i. Qualified Internal Applicants (PWD) | Answer: Yes |
| ii. Internal Selections (PWD)          | Answer: N/A |
| g. Supervisors                         |             |
| i. Qualified Internal Applicants (PWD) | Answer: No  |
| ii. Internal Selections (PWD)          | Answer: Yes |

For executives and supervisors, 0.00% of internal selections were PWD even though there were PWD in the qualified applicant pool (4.00% for executives and 7.69% for supervisors). For managers, 0.00% of qualified internal applicants were PWD although 3.33% of the relevant applicant pool were PWD.

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

- |   |             |
|---|-------------|
| a. Executives                           |             |
| i. Qualified Internal Applicants (PWTD) | Answer: Yes |

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- |   |             |
|---|-------------|
| ii. Internal Selections (PWTD)          | Answer: N/A |
| b. Managers                             |             |
| i. Qualified Internal Applicants (PWTD) | Answer: N/A |
| ii. Internal Selections (PWTD)          | Answer: N/A |
| c. Supervisors                          |             |
| i. Qualified Internal Applicants (PWTD) | Answer: No  |
| ii. Internal Selections (PWTD)          | Answer: Yes |

For executives, there's a trigger such that 0.00% of qualified internal applicants were PWTD although 1.38% of the relevant applicant pool were PWTD. For managers, there were no PWTD in the relevant applicant pool. For supervisors, 0.00% of internal selections were PWTD although 1.54% of qualified internal applicants were PWTD.

6. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.
- |                                    |             |
|------------------------------------|-------------|
| a. New Hires for Executives (PWD)  | Answer: N/A |
| b. New Hires for Managers (PWD)    | Answer: N/A |
| c. New Hires for Supervisors (PWD) | Answer: N/A |

Qualified internal applicant pool data is not currently available in HRM's data holdings, but ODNI expects the transition to USA staffing will provide improved data collection.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.
- |                                     |             |
|-------------------------------------|-------------|
| a. New Hires for Executives (PWTD)  | Answer: N/A |
| b. New Hires for Managers (PWTD)    | Answer: N/A |
| c. New Hires for Supervisors (PWTD) | Answer: N/A |

Qualified internal applicant pool data is not currently available in HRM's data holdings, but ODNI expects the transition to USA staffing will provide improved data collection.



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No exit interview data available. The ODNI used the FY 2021 IC Employee Exit survey, which is emailed to most employees, but is not mandatory. Participation in the exit interview is relatively low, resulting in insufficient data being collected.

**B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES**

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

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

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

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

In FY 2022, the ODNI plans to implement a notice specific to explaining employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

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

Consistent with IC policies and directives, the ODNI is currently updating its internal policies on personal electronic devices which includes medical devices, service animals, and reciprocity with other IC elements. In FY 2020, ODNI added touchless and ADA compliant automatic door opening to the entrances of ODNI facilities and to most work areas. During the pandemic, officers were given the opportunity to have a flexible workplace agreement, allowing them to do unclassified work from home. ODNI issued a revised Telework Policy for all ODNI officers in FY 2021, which allows unclassified work to be performed from alternate work locations. ODNI put stand-up desks in many cubicles and offices. In addition, ODNI employed new technology, including a camera and headset combination to officers' desktops, to allow for more accessible VTC options. In FY 2021, ODNI launched U-View, an UNCLASSIFIED//FOUO network that officers can use both while teleworking from home and working in the office, enabling stronger collaboration between officers teleworking and those in the office. In addition, U-View has closed captioning capabilities, bringing ODNI closer to Deaf and Hard of Hearing (DHH) guidelines.

OEEEO partnered with the IC Deaf and Hard of Hearing Affinity Group to produce a resource guide, *Small Steps to Building an Inclusive Workplace: Making Virtual Meetings More Accessible for the Intelligence Community*. The guide offers key considerations in planning virtual meetings to ensure full participation by persons with disabilities from the deaf, blind, neurodiverse, physical, and deaf/blind communities. It includes a checklist for meeting organizers and a link to over 30 web resources.

**C. REASONABLE ACCOMMODATION PROGRAM**

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

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

ODNI does not currently track that information and plans to assess the reasonable accommodations process and improve tracking in the upcoming fiscal year.

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

In FY 2021, ODNI contracted 52 sign language interpreters to support events, meetings and conferences. Additionally, we provided closed captioning services for 13 events.

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

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

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

There were no requests for PAS in FY 2021.

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Section VI: EEO Complaint and Findings Data

**B. EEO COMPLAINT DATA INVOLVING HARASSMENT**

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the government-wide average?  
No
2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?  
No
3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.  
N/A

**C. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION**

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?  
No
2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?  
No
3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.  
N/A

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**Section VII: Identification and Removal of Barriers**

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

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

Answer: Yes

2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD? Answer: Yes
3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments.

<b>Trigger 1</b>	<p>The FY 2021 data review revealed triggers for the following areas:</p> <ul style="list-style-type: none"> <li>• PWD and PWTD by grade level cluster in the permanent workforce</li> <li>• PWD and PWTD new hires</li> <li>• PWD and PWTD promoted to mission-critical occupations</li> <li>• PWD and PWTD among promotions to all grade levels and supervisory positions</li> <li>• PWD and PWTD cash and time-off awards</li> <li>• PWD and PWTD voluntary separation rates</li> </ul>
<b>Barrier(s)</b>	<ol style="list-style-type: none"> <li>1. Potential Institutional/Structural Barriers             <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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).</li> </ol> </li> </ol>

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	<ol style="list-style-type: none"> <li>2. Potential Attitudinal Barriers                     <ol style="list-style-type: none"> <li>a. Stigma around having a disability leading to discomfort disclosing disabilities.</li> <li>b. Belief that supervisors and managers do not know how to support PWD despite Section 508 Reasonable Accommodations and ICPG 110.1 Employment of Individuals with Disabilities.</li> <li>c. Belief that care and treatment of disabilities and mental health may not be supported by ODNI.</li> <li>d. Belief that there is not adequate PWD representation in leadership positions.</li> <li>e. Belief that certain experiences (e.g., overseas assignments, a requirement in some agencies) are expected for promotion, which can limit opportunities for PWD.</li> <li>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.</li> </ol> </li> <li>3. Potential Physical Barriers                     <ol style="list-style-type: none"> <li>a. Not all ODNI restroom facilities are ADA compliant.</li> </ol> </li> </ol>
<b>Objective(s)</b>	<ol style="list-style-type: none"> <li>1. Develop a targeted recruitment plan for PWD.</li> <li>2. Promote self-identification for PWD.</li> <li>3. Expand manager and supervisor training on reasonable accommodations, effective techniques to foster a more accessible environment, and empathy training to all employees.</li> <li>4. Conduct a review of the award and incentive programs to ensure it is objective and consistent.</li> <li>5. Establish a working group to update and review policies and directives related to medical devices.</li> </ol>
<b>Responsible Official(s)</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>
Deputy Chief, Diversity and Inclusion Group, Dennis W.	Yes
<b>Barrier Analysis Process Completed? (Yes or No)</b>	<b>Barrier(s) Identified? (Yes or No)</b>
Yes	Yes

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Sources of Data		Sources Reviewed? (Yes or No)	Identify Information Collected		
Complaint Data (Trends)		Yes			
Grievance Data (Trends)		Yes			
Workforce Data Tables		Yes			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti- Harassment 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/yy yy)	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 reasonable accommodation process, contact information to inquire about a reasonable accommodation as an applicant, and new information, such as what to expect in a polygraph examination.	Yes			
09/30/2023	Review ICD 705 SCIF physical and technical security requirements to increase accessibility.	Yes			

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09/30/2023	Add recruitment, hiring, inclusion, retention and advancement of individuals with disabilities questions to the IC exit survey.	Yes		
09/30/2023	Develop a one pager 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		
<b>Fiscal Year</b>	<b>Accomplishments</b>			
FY 2021	ODNI has leveraged technology that hosts an Unclassified//For Official Use Only platform to enable telework.			

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

The COVID-19 pandemic curtailed many recruitment efforts, however throughout FY 2021, the recruitment team participated in virtual recruitment events. As part of its efforts to improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities, the ODNI is actively working with the U.S. Department of Labor's Workforce Recruitment Program for College Students with Disabilities (WRP). ODNI is seeking to leverage this program to recruit highly motivated college students and recent graduates with disabilities.

ODNI continually strives to provide opportunities for America's combat-wounded military members. Using semi-annual career fairs, veterans learn about unique internship opportunities that may provide a match between their skills and mission requirements. Unfortunately, this year we did not receive any applicants under the program. As such, we have evaluated the challenges for participation in the program and identified the lengthy security process as a potential obstacle for participation.

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

The percentage of new hires with disabilities increased from 1.77% in FY 2020 to 5.61% in FY 2021.

New hires for PWD to senior grade levels increased at all grade levels (GS-13 through GS-15) except SNIS in that timeframe. For the GS-13 level, the percentage of new hires with disabilities increased from 0.00% to 6.52% in that timeframe. For the GS-14 level, the percentage of new hires with disabilities increased from 0.00% to 3.75%. At the GS-15 level, the percentage of new hires with disabilities increased from 0.00% to 10.34%. For At the SES/SNIS level, the percentage of new hires with disabilities decreased from 20.00% to 0.00% in that timeframe.

Note: the overall number of employees promoted to SES/SNIS in a typical year is exceedingly small, i.e. fewer than 10.

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

The newly established Diversity and Inclusion Group (DIG) will be reviewing activities at the end of FY 2022 and making continual adjustments toward improvement.