



**Equal Employment  
Opportunity Commission (EEOC)  
Management Directive 715 (MD-715)**

**Report for Fiscal Year (FY) 2023**

TABLE OF CONTENTS		
Part A	Agency Identifying Information	
Part B	Total Employment	
Part C	Agency Officials Responsible for Oversight of Equal Employment Opportunity (EEO) Programs	
Part D.1	List of Subordinate Components Covered in this Report	
Part D.2	Mandatory and Optional Documents for this Report	
Part E	Executive Summary	
Part E.1	Executive Summary: Mission	
Part E.2	Executive Summary: Essential Elements A-F	
Part E.3	Executive Summary: Workforce Analyses	
Part E.4	Executive Summary: Accomplishments	
Part E.5	Executive Summary: Planned Activities	
Part F	EEO Program Status Report	
Part G	Agency Self-Assessment Checklist	
Part H	Agency EEO Plan to Attain the Essential Elements of a Model EEO Program	
Part I	Agency EEO Plan to Eliminate Identified Barriers	
Part J	Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities	
	Appendices A-H	

EEOC Form 715-01 PART A-D	<b>U.S. Equal Employment Opportunity Commission DFC ANNUAL EEO PROGRAM STATUS REPORT</b>
For period covering October 1, 2022, to September 30, 2023	

**Part A - Department or Agency Identifying Information**

Agency	Second Level Component	Address	City	State	Zip Code	Agency FIPS Code
DFC	N/A	1100 New York Avenue, NW	Washington	DC	20527	GB00

**Part B - Total Employment**

Permanent Workforce	Temporary Workforce	Total Workforce
554	63	617

**Part C - Agency Officials Responsible for Oversight of EEO Program**

Agency Leadership	Name	Title
Head of Agency	Scott Nathan	Chief Executive Officer
EEO Program Staff	Name	Email
Principal EEO Director/Official	Neonu Jewell	neonu.jewell@dfc.gov
Affirmative Employment Program Manager	Neonu Jewell	neonu.jewell@dfc.gov
Complaint Processing Program Manager	Craig Cassidy	craig.cassidy@dfc.gov
Diversity & Inclusion Officer	Karmen Smith	karmen.smith@dfc.gov
Hispanic Program Manager (SEPM)	Vacant	
Women's Program Manager (SEPM)	Vacant	
Disability Program Manager (SEPM)	Shannon Moss Scott	shannon.mosscott@dfc.gov
Special Placement Program Coordinator (Individuals with Disabilities)	Samantha Miller	samantha.miller@dfc.gov
Reasonable Accommodation (RA) Program Manager	Patrick Browne	patrick.browne@dfc.gov
Anti-Harassment Program Manager	Peggy Sonnhalter	peggy.sonnhalter@dfc.gov
Alternative Dispute Resolution (ADR) Program Manager	Craig Cassidy	craig.cassidy@dfc.gov

Compliance Manager	Neonu Jewell	neonu.jewell@dfc.gov
Principal MD-715 Preparer	Craig Cassidy	craig.cassidy@dfc.gov
Equal Employment Opportunity Specialist	Ann Clark	ann.clark@dfc.gov
Other EEO Staff (Collateral Duty EEO Counselor)	Isaac Underwood	isaac.underwood@dfc.gov
Other EEO Staff (Collateral Duty EEO Counselor)	Cindy Thomas	cindy.thomas@dfc.gov
Other EEO Staff (Collateral Duty EEO Counselor)	Matthew Pritchard	matthew.pritchard@dfc.gov
Other EEO Staff (Collateral Duty EEO Counselor)	Tanya Eldridge	tanya.eldridge@dfc.gov

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

Subordinate Component	City	State	Country (Optional)	Agency Code	FIPS Codes
N/A					

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

Did the Agency submit the following mandatory documents?	Please respond Yes or No	Comments
Organizational Chart	Yes	See Appendices A.1 and A.2
EEO Policy Statement	Yes	See Appendices B.1 and B.2
Agency Strategic Plan	Yes	See Appendix C
Anti-Harassment Policy and Procedures	Yes	See Appendices D
RA Procedures	Yes	See Appendices E
Personal Assistance Services (PAS) Procedures	Yes	See Appendices E
ADR Procedures	Yes	See Appendix F

Did the Agency submit the following optional documents?	Please respond Yes or No	Comments
Federal Equal Opportunity Recruitment Program (FEORP) Report	No	
Disabled Veterans Affirmative Action Program (DVAAP) Report	No	
Diversity and Inclusion Plan under Executive Order 13583	Yes	See Appendix G
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	Yes	See Appendix H

## **Part E.1 – Executive Summary: Mission**

The U.S. International Development Finance Corporation (DFC) is the U.S. Government's development finance institution. DFC was established in 2019 through the Better Utilization of Investments Leading to Development (BUILD) Act which strengthened and modernized American development finance. The BUILD Act combined the capabilities of the Overseas Private Investment Corporation (OPIC) and the U.S. Agency for International Development (USAID) Development Credit Authority.

DFC partners with the private sector to finance solutions to the most critical challenges facing the developing world today. We invest across sectors including energy, healthcare, critical infrastructure, and technology. DFC also provides financing for small businesses and women entrepreneurs to create jobs in emerging markets. DFC investments adhere to high standards and respect the environment, human rights, and worker rights.

The Office of Equal Opportunity, Diversity, and Inclusion (OEDI) provides leadership, strategic direction, guidance, and technical assistance and advice to agency leadership and management to educate the DFC workforce on Equal Employment Opportunity (EEO) Program functions and their EEO rights and responsibilities.

The creation of this FY23 MD-715 report is a collaborative whole-of-agency process, including the Office of the Chief Executive Officer. Using multiple sources of data, the MD-715 examines policies, practices, and procedures while assessing the Corporation's efforts to identify and eliminate employment barriers.

## **Part E.2 - Executive Summary: Essential Elements**

### **Demonstrated Commitment from Agency Leadership**

Mr. Scott Nathan serves as the Chief Executive Officer (CEO), DFC. He was appointed by President Joseph R. Biden, confirmed by the Senate on February 9th, 2022. CEO Nathan has taken significant steps to advance EEO principles and Executive Order 14035, Diversity, Equity, Inclusion, and Accessibility (DEIA) in the Federal Workforce. He hired Ms. Neonu Jewell as the Corporation's inaugural Chief Diversity and Inclusion Officer (CDIO) in December 2022. In 2023, Mr. Nathan further supported his CDIO in creating the OEDI, which merged EEO and DEIA offices, as well as aligning the CDIO and EEO Director into a newly established position, Chief, Equal Opportunity, Diversity, and Inclusion Officer (CEDIO).

OEDI hired a Deputy Director, DEIA, Deputy Director, EEO, and retained a senior EEO Specialist with technical expertise. In addition, three additional full-time equivalents (FTEs) have been approved in the coming fiscal year to augment the EEO and DEIA programs.

EEO policies and procedures are published on the DFC public website at <https://www.DFC.gov> and on DFC's intranet.

### **Integration of EEO into the Agency's Strategic Missions**

The CEDIO manages all aspects of the EEO and DEIA program, is involved in and consulted on management actions, and advises managers in the implementation of its EEO and DEIA programs. DFC's EEO complaint program is supported by four collateral duty EEO counselors.

In FY23, DFC's OEDI encouraged a stronger linkage between its DEIA Strategic Plan and its overall Corporate Strategic Plan. To that end, and to help hone the mission of the corporation, DFC contracted with the Boston Consulting Group, who reviewed and provided recommendations on DFC's strategy. A Strategy Group with members throughout DFC was established to gather employee feedback throughout this process. It is anticipated that in FY24, significant metrics and goals around EEO principles will be implemented throughout DFC.

In FY23, DFC published and continued its education efforts around its Anti-Harassment policy, RA/PAS policy, and EEO Complaint Process.

### **Management and Program Accountability**

DFC's OEDI advised managers/supervisors on EEO matters and effectively coordinated with the Office of Human Resources Management (OHRM). During FY23, DFC engaged in numerous actions to promote the accountability of its EEO program, including, but not limited to, the following:

- Consistent with regulations promulgated under the Equal Employment Opportunity Commission's Management Directive 110, DFC's EEO compliance program provided counseling, ADR, and investigations to individuals raising complaints of discrimination.
- DFC posted EEO complaint processing data on its public website, consistent with the Notification and Federal Employee Antidiscrimination and Retaliation Act of 2002 (No FEAR Act). This data can be found on the DFC.gov website.
- DFC posted EEO complaint and RA/PAS information to its intranet and on bulletin boards at the DFC Headquarters.

DFC's CEO, its managers, and supervisors are equally responsible for implementing management practices that support EEO and DEIA principles. The performance standards for DFC's managers and supervisors include an EEO element that requires them to support EEO and DEIA efforts. The performance element for General Schedule leaders requires planning, organizing, and communicating work assignments to meet strategic goals and objectives; maintaining working relationships in the unit; counseling, developing, and appraising staff; dealing with employee conduct and performance problems; carrying out EEO/Anti-Harassment responsibilities and supporting diversity; utilizing resources and implementing controls to accomplish objectives; and ensuring employees who claim status as a "Whistleblower," pursuant to the Whistleblower Protection Act, are not subject to retaliation.

The performance element for Senior Level (SL) leaders requires SL employees to provide an inclusive workplace that fosters the development of others to their full potential; allows for full participation by all employees; facilitates collaboration, cooperation, and teamwork, and supports constructive resolution of conflicts; recruits, retains, and develops the talent needed to achieve a high quality, diverse workforce that reflects the nation, with the skills needed to accomplish organizational performance objectives while supporting workforce diversity, workplace inclusion, and equal employment policies and programs.

DFC has established policies and procedures to prevent all forms of EEO discrimination. The OEDI updated the CEO's annual EEO and Anti-Harassment policy statements, which were emailed to the workforce, reviewed at an agency town hall, and posted on agency bulletin boards. The OEDI also distributed information about the EEO Complaint Process, RA/PAS policy, and information about the Pregnant Workers' Fairness Act of 2023 to the DFC workforce.

## Proactive Prevention

DFC takes proactive measures to prevent discrimination and to identify and eliminate barriers to equal employment opportunity. DFC's informal EEO complaint activity, measured as the number of complaints as a percentage of the total workforce, was 0.6% in FY23.

As part of its proactive prevention efforts, DFC disseminates EEO policies covering harassment prevention, workplace violence, and RA/PAS to all personnel. DFC also publishes information on the EEO complaint process, EEO policies, and the roles and responsibilities of OEDI on its public and internal website. These websites are reviewed and updated to ensure current information is widely available to interested parties.

EEO posters were placed in high-traffic areas in the DFC facility, thereby providing employees and applicants notice of their EEO rights, such as the 45-calendar day requirement for contacting an EEO Counselor. DFC will update these notices in FY24 as needed to reflect EEO law.

In FY23, OEDI maintained an ADR policy. OEDI published information in a monthly DFC newsletter to continually inform the workforce of EEO and DEIA practices and news. OEDI used multiple communication channels to disseminate EEO and DEIA information and solicit interest for Special Emphasis Program Managers (SEPM) and Employee Resource Groups (ERGs).

DFC supports training and continuing education opportunities. In FY23, OEDI employees attended the EXCEL (Examining Conflicts in Employment Law) Conference hosted by the EEOC. Additionally, OEDI employees attend EEOC quarterly director's and Small Agency Council EEO, Diversity and Inclusion (SAC EEO/DEIA) Committee meetings to remain current on EEO and DEIA issues in the federal workplace.

## Efficiency

OEDI increased its staffing, funding, and authority to support the EEO program and DEIA strategy. DFC maintained an efficient, fair, and impartial ADR program to resolve issues at the earliest stage possible. Given the limited full-time dedicated EEO staff, DFC utilized contracts and collaborated with other federal agencies to conduct informal and formal investigations. OEDI had legal support that served as a firewall for the EEO program.

In FY24, the OEDI will require additional resources to fully support DFC's EEO program and DEIA strategy implementation to include hiring approved full-time equivalents (FTEs), contract support, and program operational funding.

OEDI had access to data to inform EEO program management through automated reports and data from the Department of Interior's Interior Business Center (IBC) and its systems of record, EEO and No Fear Act training data, and Applicant Flow data.

## Responsiveness and Legal Compliance

DFC made timely corrections to DFC policies and processes based on the EEOC Technical Assistance Visit in March 2022. Specifically, the CEO issued updated EEO and Anti-Harassment Policy Statements in May 2023. OEDI added the RA policy to the DFC public website and updated the RA policy to incorporate PAS. Both ADR and RA policies will be updated in FY24. The FY23 MD-715 Affirmative Action Plan for people with disabilities was posted to the public website. OEDI also timely complied with requests for information from the EEOC for complaints in the hearing stage.

## **Executive Summary: Accomplishments**

### **Agency Accomplishments**

- Established OEDI and hired five FTE positions.
- Timely filed the required annual EEO reports to EEOC, Office of Personnel Management (OPM), Department of Justice (DOJ), Congress, etc.
- Established EEO internal controls and systemized recordkeeping for a Model EEO Program.
- Worked collaboratively with OHRM, the Office of External Affairs (OEA), the Office of General Counsel (OGC), the Office of Information Technology (OIT), and Front Office to further EEO program and embed DEIA strategy across DFC.
- Communicated the Anti-Harassment policy and procedures to the workforce.
- Communicated the EEO policy and procedures to the workforce.
- Updated the R/PAS policy.
- Communicated EEO and DEIA information as permanent segment of DFC New Employee Orientation and DFC 101, an agency-wide monthly training on departmental functions.
- Required EEO and Anti-Harassment mandatory training.
- OEDI accessed to automated tools and applicant flow data to inform EEO programs.
- Provided guidance to DFC ERG, Pride@DFC.
- Established a DEIA Champions program to support EEO program and DEIA strategy.
- Solicited volunteers to serve as SEPMs.
- Designed and facilitated Special Emphasis Programming, such as Black History Month and Hispanic Heritage Month. DFC also offered DEIA training events such as Hidden Bias.
- Provided advice and guidance on the RA program and EEO to the collateral duty counselors.
- Updated internal and external EEO and DEIA web pages to reflect the current OEDI staff, EEO counselors, policies, processes, programs, authorities, and reports.

## **Executive Summary: Planned Activities**

There are many planned activities to ensure DFC progresses toward a Model EEO Program in FY24:

- Update and disseminate annual CEO EEO and Anti-Harassment policy statements to the workforce.
- Communicate EEO (EEO Complaint Process, R/PAS, Anti-Harassment) and DEIA updates to DFC workforce.
- Collaborate in the pilot of DFC exit surveys.
- Provide additional education to staff on Schedule A hiring authority.
- Establish regular EEO/DEIA management/supervisory updates.
- Continue to support the development of ERGs
- Continue to improve DFC's SEP.
- Hire approved OEDI FTEs and ensure sufficient funding for OEDI contract support and program operational funding.
- Obtain training for and establish team to conduct barrier analysis.
- Require EEO, Anti-Harassment, and DEIA mandatory training for the workforce.
- Continue to advance the Federal government-wide and DFC DEIA strategy.



<b>EEOC FORM 715-01 PART F</b>	<b><i>U.S. Equal Employment Opportunity Commission</i></b> <b>FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>
--	--

**CERTIFICATION of ESTABLISHMENT of CONTINUING  
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS**

I,

am the

Principal EEO Director/Official for

The U.S. International Development Finance Corporation

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

The agency has also analyzed its work force profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice is operating to disadvantage any group based on race, national origin, gender or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.

Signature of Principal EEO Director/Official





Date



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



Signature of Agency Head or Agency Head Designee





Date



**Part G - Agency Self-Assessment Checklist**



<b>Essential Element A: Demonstrated Commitment from Agency Leadership</b> This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.			
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
<b>A.1.a</b>	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "yes", please provide the annual issuance date in the comments column. [see MD-715, II(A)]	Yes	
<b>A.1.b</b>	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]	Yes	
 Compliance Indicator  Measures	<b>A.2 – The agency has communicated EEO policies and procedures to all employees.</b>	Measure Met? (Yes/No/NA)	Comments
<b>A.2.a</b>	Does the agency disseminate the following policies and procedures to all employees:		
<b>A.2.a.1</b>	Anti-harassment policy? [see MD 715, II(A)]	Yes	
<b>A.2.a.2</b>	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	Yes	
<b>A.2.b</b>	Does the agency prominently post the following information throughout the workplace and on its public website:		
<b>A.2.b.1</b>	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R	Yes	





	§ 1614.102(b)(7)]		
<b>A.2.b.2</b>	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	Yes	
<b>A.2.b.3</b>	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	Yes	External: <a href="https://www.dfc.gov/equal-employment-opportunity">https://www.dfc.gov/equal-employment-opportunity</a>  Internal: <a href="https://dfcgov.sharepoint.com/sites/EEO/Site/Pages/Reasonable-Accommodation.aspx">https://dfcgov.sharepoint.com/sites/EEO/Site/Pages/Reasonable-Accommodation.aspx</a>
<b>A.2.c</b>	Does the agency inform its employees about the following topics:		
<b>A.2.c.1</b>	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often.	Yes	Monthly
<b>A.2.c.2</b>	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Yes	Monthly
<b>A.2.c.3</b>	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Yes	Monthly
<b>A.2.c.4</b>	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.	Yes	Monthly
<b>A.2.c.5</b>	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If “yes”, please provide how often.	Yes	Annually
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>A.3 – The agency assesses and ensures EEO principles are part of its culture.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>A.3.a</b>	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.	Yes	DFC hosts a Spring and Fall Awards Ceremony with two awards for Diversity and Employee Engagement.
<b>A.3.b</b>	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Yes	

<b>Essential Element B: INTEGRATION OF EEO INTO THE AGENCY’S STRATEGIC MISSION</b> <b>This element requires that the agency’s EEO programs are structured to maintain a workplace that is free from discrimination and support the agency’s strategic mission.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.1.a</b>	<b>B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.</b>	Yes	
<b>B.1.a.1</b>	Is the agency head the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes	
<b>B.1.a.1</b>	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If “yes,” please provide the title of the agency head designee in the comments.	N/A	
<b>B.1.a.2</b>	Does the agency’s organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes	
<b>B.1.b</b>	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency’s EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes	
<b>B.1.c</b>	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the “State of the agency” briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I)] If “yes”, please provide the date of the briefing in the comments column.	Yes	State of the Agency briefing with the CEO: April 2023 & July 2023. DFC All-Agency Townhall: September 20, 2023
<b>B.1.d</b>	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]	Yes	



 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.2 – The EEO Director controls all aspects of the EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.2.a</b>	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]	Yes	
<b>B.2.b</b>	Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)]	Yes	
<b>B.2.c</b>	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes	
<b>B.2.d</b>	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes	
<b>B.2.e</b>	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Yes	
<b>B.2.f</b>	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]	Yes	
<b>B.2.g</b>	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2) and (c)(3)]	N/A	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.3.a</b>	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]	Yes	



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

	§ 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]		
<b>B.4.a.9</b>	to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes	
<b>B.4.a.10</b>	to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]	Yes	
<b>B.4.a.11</b>	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Yes	
<b>B.4.b</b>	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	No	
<b>B.4.c</b>	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes	
<b>B.4.d</b>	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?	Yes	
<b>B.4.e</b>	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.5.a</b>	Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:		
<b>B.5.a.1</b>	EEO Complaint Process? [see MD-715(II)(B)]	No	
<b>B.5.a.2</b>	Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]	Yes	
<b>B.5.a.3</b>	Anti-Harassment Policy? [see MD-715(II)(B)]	Yes	
<b>B.5.a.4</b>	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	No	



<b>B.5.a.5</b>	ADR, with emphasis on the federal government’s interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	No	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.6 – The agency involves managers in the implementation of its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.6.a</b>	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	Yes	
<b>B.6.b</b>	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	N/A	
<b>B.6.c</b>	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	N/A	
<b>B.6.d</b>	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR § 1614.102(a)(5)]	N/A	
<b>Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY</b>			
<b>This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency’s EEO Program and Plan.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.1 – The agency conducts regular internal audits of its component and field offices.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.1.a</b>	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If “yes”, please provide the schedule for conducting audits in the comments section.	N/A	
<b>C.1.b</b>	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If “yes”, please provide the schedule for conducting audits in the comments section.	N/A	







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

<b>C.2.b</b>	Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR 1614.203(d)(3)]	Yes	
<b>C.2.b.1</b>	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]	Yes	
<b>C.2.b.2</b>	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	Yes	
<b>C.2.b.3</b>	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]	No	
<b>C.2.b.4</b>	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]	Yes	
<b>C.2.b.5</b>	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests in the comments column.	Yes	
<b>C.2.c</b>	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	Yes	
<b>C.2.c.1</b>	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.	Yes	External: <a href="https://www.dfc.gov/equal-employment-opportunity">https://www.dfc.gov/equal-employment-opportunity</a> Internal: <a href="https://dfc.gov.sharepoint.com/sites/EEO/Site/Pages/Reasonable-Accommodation.aspx">https://dfc.gov.sharepoint.com/sites/EEO/Site/Pages/Reasonable-Accommodation.aspx</a>
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>





<b>C.3.a</b>	Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	Yes	
<b>C.3.b</b>	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:		
<b>C.3.b.1</b>	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]	No	
<b>C.3.b.2</b>	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	No	
<b>C.3.b.3</b>	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	Yes	
<b>C.3.b.4</b>	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	Yes	
<b>C.3.b.5</b>	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	No	
<b>C.3.b.6</b>	Provide disability accommodations when such accommodations do not cause an undue hardship? [ see 29 CFR §1614.102(a)(8)]	No	
<b>C.3.b.7</b>	Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]	No	
<b>C.3.b.8</b>	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]	No	
<b>C.3.b.9</b>	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	No	
<b>C.3.c</b>	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	Yes	
<b>C.3.d</b>	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	Yes	





 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.4.a</b>	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	Yes	
<b>C.4.b</b>	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	Yes	
<b>C.4.c</b>	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	Yes	
<b>C.4.d</b>	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	Yes	
<b>C.4.e</b>	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:		
<b>C.4.e.1</b>	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	No	
<b>C.4.e.2</b>	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	Yes	
<b>C.4.e.3</b>	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Yes	
<b>C.4.e.4</b>	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	N/A	
<b>C.4.e.5</b>	Assist in preparing the MD-715 report? [see MD-715, II(C)]	Yes	

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

 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.6 – The EEO office advises managers/supervisors on EEO matters.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.6.a</b>	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments column.	Yes	Reports were provided as needed bi-monthly to quarterly and increased in frequency during the last quarter of the reporting period.
<b>C.6.b</b>	Are EEO officials readily available to answer managers’ and supervisors’ questions or concerns? [see MD-715 Instructions, Sec. I]	Yes	



**Essential Element D: PROACTIVE PREVENTION**  
**This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.**

 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.1.a</b>	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	No	
<b>D.1.b</b>	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I]	N/A	
<b>D.1.c</b>	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]	No	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.2.a</b>	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	No	
<b>D.2.b</b>	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	No	
<b>D.2.c</b>	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	Yes	
<b>D.2.d</b>	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable	Yes	Climate surveys, data from Anti-Harassment program, labor union, focus groups, RA/PAS program data & complaint processing records.



	accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] If “yes”, please identify the data sources in the comments column.		
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.3 – The agency establishes appropriate action plans to remove identified barriers.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.3.a.</b>	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	N/A	
<b>D.3.b</b>	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	N/A	
<b>D.3.c</b>	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	N/A	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.4.a</b>	Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d)(4)] Please provide the internet address in the comments.	Yes	<a href="https://www.dfc.gov/sites/default/files/media/documents/Part%20J.pdf">https://www.dfc.gov/sites/default/files/media/documents/Part%20J.pdf</a>
<b>D.4.b</b>	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]	Yes	
<b>D.4.c</b>	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]	Yes	
<b>D.4.d</b>	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)]	Yes	





**Essential Element E: EFFICIENCY**





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





 <b>Compliance Indicator</b>	<b>E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
 <b>Measures</b>			
<b>E.1.a</b>	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Yes	
<b>E.1.b</b>	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Yes	
<b>E.1.c</b>	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(l)?	Yes	
<b>E.1.d</b>	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(l)? If so, please provide the average processing time in the comments.	Yes	FY 2023 average processing time was 26 days.
<b>E.1.e</b>	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	Yes	
<b>E.1.f</b>	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	Yes	
<b>E.1.g</b>	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	Yes	
<b>E.1.h</b>	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	Yes	
<b>E.1.i</b>	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?	Yes	



<b>E.1.j</b>	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If “yes”, please describe how in the comments column.	Yes	Specific language is included in contracts to penalize contractors for poor performance.
<b>E.1.k</b>	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes	
<b>E.1.l</b>	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.2 – The agency has a neutral EEO process.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.2.a</b>	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)]	Yes	
<b>E.2.b</b>	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If “yes”, please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.	Yes	Agency had a dedicated firewall counsel (separate from agency’s defensive function) in the Office of General Counsel (OGC), to advise the OEDI and ensure fair and impartial investigations of complaints.
<b>E.2.c</b>	If the EEO office relies on the agency’s defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]	N/A	
<b>E.2.d</b>	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	Yes	
<b>E.2.e</b>	If applicable, are processing time frames incorporated for the legal counsel’s sufficiency review for timely processing of complaints? [see EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)]	Yes	

 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.3.a</b>	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	Yes	
<b>E.3.b</b>	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Yes	
<b>E.3.c</b>	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	Yes	
<b>E.3.d</b>	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes	
<b>E.3.e</b>	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Yes	
<b>E.3.f</b>	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	No	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.4.a</b>	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:		
<b>E.4.a.1</b>	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	Yes	
<b>E.4.a.2</b>	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	Yes	
<b>E.4.a.3</b>	Recruitment activities? [see MD-715, II(E)]	Yes	
<b>E.4.a.4</b>	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	Yes	
<b>E.4.a.5</b>	The processing of requests for reasonable accommodation? [29 CFR §	Yes	

	1614.203(d)(4)]		
<b>E.4.a.6</b>	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	Yes	
<b>E.4.b</b>	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.5.a</b>	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	OEDI held regular weekly meetings to examine its progress and ensure compliance under all EEO statutes and regulations.
<b>E.5.b</b>	Does the agency review other agencies’ best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	Attended SAC EEODI meetings and EXCEL Conference and incorporated benchmarks when appropriate.
<b>E.5.c</b>	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Yes	
<b>Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE</b>			
<b>This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>F.1.a</b>	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	Yes	
<b>F.1.b</b>	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	Yes	

<b>F.1.c</b>	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes	
<b>F.1.d</b>	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes	
<b>F.1.e</b>	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>F.2.a</b>	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	Yes	
<b>F.2.a.1</b>	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]	Yes	
<b>F.2.a.2</b>	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	N/A	
<b>F.2.a.3</b>	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC’s Office of Federal Operations? [see 29 CFR §1614.403(e)]	Yes	
<b>F.2.a.4</b>	Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.3 - The agency reports to EEOC its program efforts and accomplishments.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>F.3.a</b>	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	Yes	
<b>F.3.b</b>	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	Yes	

**Part H - DFC Plan to Attain the Essential Elements of a Model EEO Program**

<b>STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY</b>				
<b>TYPE OF PROGRAM DEFICIENCY</b>		<b>BRIEF DESCRIPTION OF PROGRAM DEFICIENCY</b>		
<b>Essential Element B: Integration of EEO into the Agency's Strategic Mission</b>		<p>B.3.b: The United States International Development Finance Corporation Strategic Plan FY22-26 plan does not reference EEO, diversity, and inclusion principles.</p> <p>B.4.a.2, B.4.a.8: OEDI did not have sufficient staffing to conduct a thorough barrier analysis of its workforce or effectively administer its SEP.</p> <p>B.4.b: OEDI did not have a budget separate from other offices within the agency.</p> <p>B.5.a.1, B.5.a.4, B.5.a.5: All managers/supervisors have not received training on their responsibilities under the EEO complaint process, supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications; and ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR.</p>		
<b>OBJECTIVE(S) AND DATES FOR EEO PLAN</b>				
<b>DATE INITIATED (MM/DD/YYYY)</b>	<b>OBJECTIVE</b>	<b>TARGET DATE (MM/DD/YYYY)</b>	<b>MODIFIED DATE (MM/DD/YYYY)</b>	<b>DATE COMPLETED (MM/DD/YYYY)</b>
10/1/2023	B.3.b: DFC will ensure the United States International Development Finance Corporation Strategic Plan FY22-26 references EEO, diversity, and inclusion principles.	9/30/2024		
10/1/2023	B.4.a.2: DFC will ensure OEDI has sufficient budget and staffing to conduct a thorough barrier analysis.	9/30/2024		
10/1/2023	B.4.a.8: DFC will ensure OEDI has sufficient budget and staffing to effectively administer its SEPs.	9/30/2024		

10/1/2023	B.4.b: DFC will establish an OEDI budget that is separate from other offices within the agency.	9/30/2024		
10/1/2023	B.5.a.1, B.5.a.4, B.5.a.5: DFC will train all managers of their responsibilities under the proper areas of the EEO program, e.g., EEO Complaint process, supervisory communication and interpersonal skills, and ADR.	9/30/2024		
<b>RESPONSIBLE OFFICIAL(S)</b>				
<b>TITLE</b>	<b>NAME</b>	<b>PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)</b>		
CEO	Scott Nathan	N/A		
Vice President and Chief Human Capital Officer (VP & CHCO)	William White	Yes		
CEDIO	Neonu Jewell	N/A		
Vice President and Chief Financial Officer	Mildred Callear	Yes		
<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE</b>				
<b>TARGET DATE (MM/DD/YYYY)</b>	<b>PLANNED ACTIVITIES</b>	<b>SUFFICIENT FUNDING &amp; STAFFING (YES OR NO)</b>	<b>MODIFIED DATE (MM/DD/YYYY)</b>	<b>DATE COMPLETED (MM/DD/YYYY)</b>
10/1/2023	B.3.b: Collaborate with Director of Strategy, attend DFC Strategy meetings, and provide appropriate input to ensure equal employment opportunity, diversity, and inclusion principles are addressed in the DFC strategic plan.	Yes	9/30/2024	
10/1/2023	B.4.a.2: Obtain sufficient funding and hire approved FTEs to conduct a thorough barrier analysis.	No	9/30/2024	
10/1/2023	B.4.a.8: Obtain sufficient funding and hire approved FTEs to effectively administer SEPs.	No	9/30/2024	



10/1/2023	B.4.b: Establish an OEDI budget that is separate from other offices within the agency.	Yes	9/30/2024	
10/1/2023	B.5.a.1, B.5.a.4, and B.5.a.5: Review current courses in FedTalent relating the supervisors/managers responsibilities to EEO program areas. Identify and provide training courses with the Training Coordinator.	Yes	9/30/2024	

**REPORT OF ACCOMPLISHMENTS**

<b>FISCAL YEAR</b>	<b>ACCOMPLISHMENTS</b>
2023	<p>In FY23, DFC hired the Corporation’s inaugural Chief Diversity and Inclusion Officer (CDIO) in December of 2022. In 2023, DFC created the OEDI, which merged EEO and DEIA offices, as well as aligning the CDIO and EEO Director into a newly established position, Chief, Equal Opportunity, Diversity, and Inclusion Officer (CEDIO).</p> <p>OEDI hired a Deputy Director, DEIA, Deputy Director, EEO, and retained a senior EEO Specialist with technical expertise. In addition, three additional full-time equivalents (FTEs) have been approved in the coming fiscal year to augment the EEO and DEIA programs, including Employee Resource Groups (ERGs) and Special Emphasis Programs (SEPs).</p> <p>OEDI began reviewing existing policies and programs for areas of opportunity. OEDI organized multiple special observances in support of SEPs in FY23.</p>

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY				
TYPE OF PROGRAM DEFICIENCY		BRIEF DESCRIPTION OF PROGRAM DEFICIENCY		
<b>Essential Element C: Management and Program Accountability</b>		<p>C.2.a.4: OEDI did not inform the Anti-Harassment program of all EEO counseling activity alleging harassment.</p> <p>C.2.b.3: The agency did not adequately inform job applicants on the process to request and receive RA during the application and placement process.</p> <p>C.3.b.1, C.3.b.2, C.3.b.5-9: The agency did not require rating officials to evaluate the performance of managers and supervisors based on the following: (b.1) resolving EEO problems /disagreements/conflicts, including the participation in ADR proceedings, (b.2) ensuring full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators, (b.5) providing religious accommodations when such accommodations do not cause an undue hardship, (b.6) providing disability accommodations when such accommodations do not cause an undue hardship, (b.7) supporting the EEO program in identifying and removing barriers to equal opportunity, (b.8) supporting the anti-harassment program in investigating and correcting harassing conduct, and (b.9) complying with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority.</p> <p>C.4.e.1: DFC did not have effective communication between its EEO programs and Human Resources (HR) program, to implement the Affirmative Action Plan for Individuals with Disabilities</p>		
OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
10/1/2023	C.2.a.4. DFC will establish process with Anti-Harassment program of EEO counseling activity alleging harassment.	9/30/2024		
10/1/2023	C.2.b.3: DFC will ensure job applicants are adequately informed of how to request and receive RA during the application and placement processes.	9/30/2024		



10/1/2023	C.3.b.1: DFC will require rating officials to evaluate performance of managers and supervisors in resolving EEO problems/conflicts, including participation in ADR proceedings.	9/30/2024		
10/1/2023	C.3.b.2: DFC will require rating officials to evaluate performance of managers and supervisors in ensuring full cooperation of employees under his/her supervision with EEO officials.	9/30/2024		
10/1/2023	C.3.b.5: DFC will require rating officials to evaluate performance of managers and supervisors in providing religious accommodations that do not cause undue hardship.	9/30/2024		
10/1/2023	C.3.b.6: DFC will require rating officials to evaluate performance of managers and supervisors in providing disability accommodations that do not cause undue hardship.	9/30/2024		
10/1/2023	C.3.b.7: DFC will require rating officials to evaluate performance of managers and supervisors in supporting EEO program in identifying and removing barriers to equal opportunity.	9/30/2024		
10/1/2023	C.3.b.8: DFC will require rating officials to evaluate performance of managers and supervisors in supporting the anti-harassment program in investigating and correcting harassing behavior.	9/30/2024		
10/1/2023	C.3.b.9: DFC will require rating officials to evaluate performance of managers and supervisors in complying with settlement agreements and orders issued by the agency, EEO, and EEO-	9/30/2024		

	related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority.			
10/1/2023	C.4.e.1: DFC will ensure the agency has an effective communication between its EEO programs and Human Resources (HR Programs) to implement the Affirmative Action Plan for Individuals with Disabilities.	9/30/2024		
<b>RESPONSIBLE OFFICIAL(S)</b>				
<b>TITLE</b>	<b>NAME</b>	<b>PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)</b>		
CEO	Scott Nathan	N/A		
VP & CHCO	William White	Yes		
CEDIO	Neonu Jewell	N/A		
Vice President & General Counsel	Sarah Fandell	Yes		
<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE</b>				
<b>TARGET DATE (MM/DD/YYYY)</b>	<b>PLANNED ACTIVITIES</b>	<b>SUFFICIENT FUNDING &amp; STAFFING (YES OR NO)</b>	<b>MODIFIED DATE (MM/DD/YYYY)</b>	<b>DATE COMPLETED (MM/DD/YYYY)</b>
10/1/2023	C.2.a.4: Establish process that OEDI informs Anti-Harassment program of EEO counseling activity alleging harassment.	Yes	9/30/2024	
10/1/2023	C.3.b.1: Coordinate with OHRM to ensure rating officials evaluate the performance of managers and supervisors based on resolving EEO problems/disagreements/conflicts, including participation in ADR proceedings.	Yes	9/30/2024	
10/1/2023	C.3.b.2: Coordinate with OHRM to ensure rating officials evaluate the performance of managers and supervisors based on	Yes	9/30/2024	

	ensuring full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators.			
10/1/2023	C.3.b.5: Coordinate with OHRM to ensure rating officials evaluate the performance of managers and supervisors based on providing religious accommodations when such accommodations do not cause an undue hardship.	Yes	9/30/2024	
10/1/2023	C.3.b.6: Coordinate with OHRM to ensure rating officials evaluate the performance of managers and supervisors based on providing disability accommodations when such accommodations do not cause an undue hardship.	Yes	9/30/2024	
10/1/2023	C.3.b.7: Coordinate with OHRM to ensure rating officials evaluate the performance of managers and supervisors based on supporting the EEO program in identifying and removing barriers to equal opportunity.	Yes	9/30/2024	
10/1/2023	C.3.b.8: Coordinate with OHRM to ensure rating officials evaluate the performance of managers and supervisors based on supporting the anti-harassment program in investigating and correcting harassing conduct.	Yes	9/30/2024	
10/1/2023	C.3.b.9: Coordinate with OHRM to ensure rating officials evaluate the performance of managers and supervisors based on complying with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority.	Yes	9/30/2024	
10/1/2023	C.4.e.1: Coordinate with OHRM on implementation of Affirmative Action Plan for Individuals with Disabilities.	Yes	9/30/2024	

REPORT OF ACCOMPLISHMENTS	
FISCAL YEAR	ACCOMPLISHMENTS
2023	<p>The CEDIO utilized regular interactions with agency senior leaders to further the EEO Program. DFC incorporated OEDI recommendations in various organizational changes and leadership development.</p> <p>OEDI staff had access to HR data to inform the EEO program and identify areas of strengths and opportunities. Further analysis will be pursued in FY24.</p>

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY				
TYPE OF PROGRAM DEFICIENCY		BRIEF DESCRIPTION OF PROGRAM DEFICIENCY		
<b>Essential Element D: Proactive Prevention of Unlawful Discrimination</b>		<p>D.1.a: The agency did not have a process for identifying triggers in the workplace.</p> <p>D.1.c: The agency did not conduct exit interviews or surveys that included questions on how the agency could improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities.</p> <p>D.2.a, D.2.b: The agency did not identify areas where barriers may exclude EEO groups, e.g., a process for analyzing the identified triggers to find possible barriers or regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability.</p>		
OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
10/1/2023	D.1.a: DFC will establish processes to identify triggers in the workplace.	9/30/2024		
10/1/2023	D.1.c: DFC will conduct exit interviews.	9/30/2024		
10/1/2023	D.2.a, D.2.b: DFC will conduct barrier analysis.	9/30/2024		
RESPONSIBLE OFFICIAL(S)				
TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)		

CEO	Scott Nathan	N/A
Deputy CEO	Nisha Biswal	N/A
Chief of Staff	Jane Rhee	N/A
CEDIO	Neonu Jewell	N/A
VP & CHCO	William White	Yes

**PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE**

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
10/1/2023	D.1.a: OEDI team will attend barrier analysis training and develop a plan to conduct barrier analysis.	No	9/30/2024	
10/1/2023	D.1.c: DFC will finalize an exit interview and pilot an exit interview process as part of offboarding.	No	9/30/2024	
10/1/2023	D.2.a, D.2.b: OEDI staff will attend barrier analysis training. Establish process and plan to conduct barrier analysis.	No	9/30/2024	

**REPORT OF ACCOMPLISHMENTS**

FISCAL YEAR	ACCOMPLISHMENTS
2023	<p>An Affirmative Action Plan was established and posted to the agency's public website.</p> <p>OEDI obtained authorization to hire 3 additional FTEs to support the agency's ability to manage SEPs and conduct barrier analysis.</p>

<b>STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY</b>				
<b>TYPE OF PROGRAM DEFICIENCY</b>		<b>BRIEF DESCRIPTION OF PROGRAM DEFICIENCY</b>		
Essential Element D: Proactive Prevention of Unlawful Discrimination		E.3.f: The agency did not annually evaluate the effectiveness of its ADR program.		
<b>OBJECTIVE(S) AND DATES FOR EEO PLAN</b>				
<b>DATE INITIATED (MM/DD/YYYY)</b>	<b>OBJECTIVE</b>	<b>TARGET DATE (MM/DD/YYYY)</b>	<b>MODIFIED DATE (MM/DD/YYYY)</b>	<b>DATE COMPLETED (MM/DD/YYYY)</b>
10/1/2023	E.3.f: DFC will evaluate effectiveness of ADR program.	9/30/2024		
<b>RESPONSIBLE OFFICIAL(S)</b>				
<b>TITLE</b>	<b>NAME</b>	<b>PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)</b>		
CEO	Scott Nathan	N/A		
CEDIO	Neonu Jewell	N/A		
VP & CHCO	William White	Yes		
<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE</b>				
<b>TARGET DATE (MM/DD/YYYY)</b>	<b>PLANNED ACTIVITIES</b>	<b>SUFFICIENT FUNDING &amp; STAFFING (YES OR NO)</b>	<b>MODIFIED DATE (MM/DD/YYYY)</b>	<b>DATE COMPLETED (MM/DD/YYYY)</b>
10/1/2023	E.3.f: Evaluate effectiveness of ADR program. Review and update ADR policy, as appropriate.	No	9/30/2024	
<b>REPORT OF ACCOMPLISHMENTS</b>				
<b>FISCAL YEAR</b>	<b>ACCOMPLISHMENTS</b>			
2023	OEDI ensured statutory timelines were met for EEO Complaint Program and updated processes to facilitate timely submissions of required reporting.			

**Part I – DFC’s EEO Plan to Eliminate Identified Barriers**

**Not Applicable. Agency did not conduct barrier analysis during reporting period.**

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

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

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

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

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

a. Cluster GS-1 to GS-10 (PWD)	Yes    No <input checked="" type="checkbox"/>
b. Cluster GS-11 to SES (PWD)	Yes <input checked="" type="checkbox"/> No

In FY23, the agency was below the 12% inclusion benchmark for PWD. Though the agency fell short, there was improvement from FY22. While this shows a positive trend, the agency lacked the HR analytics personnel and resources to adequately analyze this information to determine if triggers existed.

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

a. Cluster GS-1 to GS-10 (PWTD)	Yes    No <input checked="" type="checkbox"/>
b. Cluster GS-11 to SES (PWTD)	Yes    No <input checked="" type="checkbox"/>

N/A

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

During FY22, OHRM modified their checklist used by Hiring Managers and HR Staffing Specialists which effectively is the “plan” for each DFC hiring action. Along with details on the requirements of the position, the checklist provides guidance on how the vacancy will be filled, how the Hiring Manager will be targeting the recruitment action to obtain the desired applicant pool. The vacancy announcement information includes goals are listed for PWDs and PWTDs government-wide hiring goals, i.e., 10-12% for PWDs and 2% for PWTDs, as well as education requirements permissible only when required by the applicable OPM qualification standard to ensure Hiring Managers’ awareness.

The hiring planning conversation between an HR Specialist and a Hiring Manager is the forum where a hiring action is planned and the checklist is populated. To guide this conversation, HR Specialists use a “Pre-Recruitment Strategic Conversation” guide, especially with inexperienced Hiring Managers. The guide includes a note to HR Specialists to discuss recruitment options: Delegated Examining (DE), Merit Promotion (MP), Direct Hire, non-competitive hiring authorities (e.g., Veterans’ Recruitment Authority (VRA), 30% disabled veterans, Schedule A, Military Spouse), resume mining, Pathways Programs, Peace Corps Board, WRP, and clearing Career Transition Assistance Plan (CTAP)/Interagency Career Transition Assistance Plan (ICTAP).

**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 RA program and SEP, 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.

Yes    No

During FY23, DFC’s disability program was managed by various departments, including OEDI, OIT, and OHRM. OEDI increased its staff to 5 FTEs and OIT dedicated resources to Section 508 Accessibility compliance. The agency will benefit from increased staffing, collaboration, and more centralization of the disability program. DFC has approved OEDI 3 additional FTEs.



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	10	0	0	Todd Morris, Director, Talent Acquisition Unit, OHRM, todd.morris@dfc.gov
Answering questions from the public about hiring authorities that take disability into account	10	0	0	Todd Morris, Director, Talent Acquisition Unit, OHRM, todd.morris@dfc.gov
Processing reasonable accommodation requests from applicants and employees	3	0	0	Patrick Browne, Director, Workforce Relations and Benefits, OHRM, patrick.browne@dfc.gov
Section 508 Compliance	3		0	Tina Donbeck, Vice President and Chief Information Officer, OIT, tina.donbeck@dfc.gov
Architectural Barriers Act Compliance	0	0	1	Keron White, Vice President and Chief Administrative Officer, Office of Administration (OA), keron.white@dfc.gov
Special Emphasis Program for PWD and PWTD	0	0	0	N/A

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

Yes x No

Training included Department of Homeland Security (DHS) Trusted Tester (Version 5), General Services Administration (GSA) ART/Procurement Accessibility Training, Introduction to Accessibility (FedTalent), Video Accessibility 101 by 3Play Media.

**B. Plan to Ensure Sufficient Funding for the Disability Program**

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

Yes No x

Presently DFC lacks sufficient resources to fully mature the accessibility program. Additional resources are needed to:

- Create and deliver on enterprise-wide education.
- Conduct a11y reviews and remediation in an on-going pipeline fashion for all content published to the Web.
- Conduct a11y reviews and remediation in an on-going pipeline fashion for all digital communications to employees.
- Create standards around accessible events---both e-events/townhalls and in-person events.
- Support capabilities for escalated Section 508 complaints, including those from employees and those from outside the Agency.
- Funding is needed to procure a mass-scanning tool for Web accessibility to scan out site monthly and roll up findings into “bugs” and a dashboard so a qualitative trend line around DFC Web accessibility can be started.

Planned course of action is (a) adopt and socialize the Accessibility Policy which mandates changes to existing business and technical practices, which will have the consequence of needing increase Section 508 SME count, and (b) establish annual accessibility conformance goals and ways to measure success and impact.

**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.

Over the last fiscal year, DFC utilized a variety of recruitment strategies designed to increase the number of qualified applicants with disabilities and applicants with targeted disabilities within the major occupations. DFC utilized the following resources to identify job applicants with disabilities, including targeted disabilities:

- OPM’s Shared Register of Candidates with Disabilities (Bender List)
- Websites geared towards veterans
- Virtual Career Fairs at Universities
- Updating Selective Placement Program Coordinator information on OPM’s Directory.
- Workforce Recruitment Program
- Recruiters utilize the Agency Talent Portal on USAJOBS to source candidates who meet non-competitive eligibility, including PWD under Schedule A and 30% or More Disabled Veterans hiring authorities.
- FedshireVets has the Agency’s contact information listed.

- Recruiters engage with and share open opportunities with over 90 diverse groups on LinkedIn, including some that are specifically targeted to PWD.

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.

DFC uses Schedule A appointing authority (5 C.F.R. 213.310(2)) and 30% or More Disabled Veteran appointing authority (5 U.S.C. 3112; C.F.R. 316.302, 316.402, and 315.707) to proactively hire PWD and PWTD expeditiously.

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.

To determine if an applicant is eligible under Schedule A, OHRM reviews the application package to determine if the required documentation was provided (as described in the vacancy announcement from OPM's Disability Employment Page). The documentation is reviewed for eligibility under the hiring authority. This is applied when a candidate applies through USAJOBS and/or directly to OHRM. If the documentation submitted is unclear, OHRM gives tentative consideration under this hiring authority. In this case, if the individual is selected, OHRM asks the selectee to furnish the appropriate documentation. When an applicant applies through USAJOBS, OHRM reviews the package for qualifications and eligibility. Those eligible and qualified under non-competitive hiring authorities are placed on a certificate of eligible applicants that is separate from those competitively eligible. Additionally, OHRM searches OPM's List of Persons with Disabilities. If qualified candidates are found, the resumes are forwarded to the hiring official via email for consideration.

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

Yes    No

DFC will review plans for training encompassing topics that cover:

- Promoting and supporting employment of PWDs/PWTDs for all employment opportunities in the agency.
- Use of Schedule A authority for people with disabilities.
- Use of other tools available to assist hiring managers to identify qualified applicants with disabilities.
- Education on DFC's procedures for providing RA to job applicants and employees with disabilities.
- Education for onboarding employees and hiring managers.

## **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.

DFC recruiters attended several diverse recruitment events in FY23, three (3) of which were targeted towards individuals with disabilities. Regardless of whether the target audience at these events included PWD or PWTD, DFC Recruiters educated attendees on the use of non-competitive hiring authorities (i.e., Schedule A, Veterans 30% or More Disabled). Events included:

- Stevenson University Fall Career & Internship Fair (Q1)
- Towson University CBE Fall Career Fair (Q1)
- Hiring Our Heroes Virtual Hiring Fair for Federal Jobs (Q1)
- Career Connections Virtual Career Fair (Q2) – Targeted to RPCVs, AmeriCorps Alumni, and U.S. Exchange Alumni
- John Hopkins SAIS Career Fair (Q3)
- Navy Wounded Warrior Professional Social (Q3)
- Career Connections Career Fair (Q3) - Targeted to RPCVs, AmeriCorps Alumni, and U.S. Exchange Alumni
- Peace Corps Career Fair (Q3)
- Hiring Our Heroes Virtual Hiring Fair for Federal Jobs (Q4)
- Peace Corps Career Fair - Seattle (Q4)
- Congressional Black Caucus Foundation, 2023 Annual Legislative Conference Exhibit Showcase (Q4)

DFC hosted two (2) virtual information sessions in FY23 for potential candidates and ensured both sessions was accessible by providing closed captioning and ASL Interpreters.

DFC recruiters referred roughly 10 candidates via the Selective Placement Program and Workforce Recruitment Program (WRP) in FY23 for a variety of administrative positions. DFC staffing specialists are also registered recruiters in the Workforce Recruitment Program (WRP) and have access to the WRP Database for possible placement of candidates.

DFC recruiters contacted and shared DFC information with veteran support groups, information was specifically targeted toward members with 30% or more disability or those who qualify for VRA. DFC recruiters and staffers continuously met with hiring managers about using non-competitive hiring authorities (i.e., Schedule A, Veterans 30% or More Disabled) to hire candidates.

DFC recruiters used social media platforms and the USAJOBS Agency Talent Portal to source candidates with non-competitive hiring authority eligibility (i.e., Schedule A, Veterans 30% or More Disabled) to meet vacancy requirements.

DFC recruiters shared vacancies with 93 plus diverse, several targeted towards PWD & PWTD, groups on LinkedIn. DFC recruiters posted DFC vacancies in each group and answered questions about the position. This resulted in thousands of impressions to increase awareness of DFC and available positions.

In FY23, DFC recruiters attended multiple Workforce Recruitment Program (WRP) webinars and trainings. Through WRP, we have access to candidates with disabilities and veterans across the nation.

A DFC Recruiter and the DFC Student Programs Coordinator participated in the WRP informational interviews with students in Q1. DFC Recruiters updated contacted information on OPM's Selective Placement Program Coordinator Directory and FedHireVets.

**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)  | Yes | No | x |
| b. New Hires for Permanent Workforce (PWTD) | Yes | No | x |

N/A

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

- |                             |     |    |    |
|-----------------------------|-----|----|----|
| a. New Hires for MCO (PWD)  | Yes | No | x  |
| b. New Hires for MCO (PWTD) | Yes | x  | No |

No PWTD were newly hired in MCO's in FY 23. The qualified applicant pool for two of the MCO's (Economist, job series 0110 and General Attorney, job series 0905) were low in comparison to the other MCO's for the agency. The agency lacked the HR analytics personnel and resources to adequately analyze this information to determine if triggers existed.

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

- |  |     |   |    |
|--|-----|---|----|
| a. Qualified Applicants for MCO (PWD)  | Yes | x | No |
| b. Qualified Applicants for MCO (PWTD) | Yes | x | No |

PWD were a small part of the applicant pool for MCO's in comparison to their inclusion rate. PWTD were just under their inclusion rate in applications, but none were selected. Applications for job series 0905 and 0110 lagged behind other MCO's for all applicants without disabilities and both PWD and PWTD. The agency lacked the HR analytics personnel and resources to adequately analyze this information to determine if triggers existed.

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

- |                              |     |    |    |
|------------------------------|-----|----|----|
| a. Promotions for MCO (PWD)  | Yes | x  | No |
| b. Promotions for MCO (PWTD) | Yes | No | x  |

PWD exceeded their benchmarks in two of the agency’s MCO’s (Accounting, job series 0510 and Administration, job series 0301) for promotions. Despite this, there were no promotions of PWD in any other MCO’s even when there was a qualified applicant pool. The agency lacked the HR analytics personnel and resources to adequately analyze this information to determine if triggers existed.

**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.

DFC plans to review and advise on the development of the agency’s plan for opportunities for advancement.

**B. Career Development Opportunities**

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

DFC provides technical and professional development training to supervisory and non-supervisory employees through agency training, individual training, Skillsoft training, executive coaching, and a pilot mentoring program.

2. 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	N/A	N/A	N/A	N/A
Fellowship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Mentoring Programs	25	25	N/A	N/A	N/A	N/A
Coaching Programs	N/A	6	N/A	N/A	N/A	N/A

Training Programs	N/A	N/A	N/A	N/A	N/A	N/A
Detail Programs	N/A	N/A	N/A	N/A	N/A	N/A
Other Career Development Programs	N/A	N/A	N/A	N/A	N/A	N/A

3. 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) Yes    No x
- b. Selections (PWD) Yes    No x

N/A

4. 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) Yes    No x
- b. Selections (PWTD) Yes    No x

N/A

**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 text box.

- a. Awards, Bonuses, & Incentives (PWD) Yes x No
- b. Awards, Bonuses, & Incentives (PWTD) Yes x No

In FY23, average cash award amounts for PWD and PWTD were lower than individuals with no disabilities. In FY23, TOAs (1-9 hours) was lower for PWDs and significantly lower for PWTDs than that of individuals with no disabilities. There were no notable distinctions for TOAs (9 hours or greater) among PWD, PWTD, and individuals with no disabilities. The agency lacked the HR analytics personnel and resources to adequately analyze this information to determine if triggers existed.

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) Yes x No
- b. Pay Increases (PWTD) Yes    No x

In FY23, the average benefit for QSIs and Total Benefit for PWD was significantly lower than that of individuals with no disabilities. The average benefit for PWTD was higher than both PWDs and individuals with no disabilities. The agency lacked the HR analytics personnel and resources to adequately analyze this information to determine if triggers existed.

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)  | Yes | No | N/A x |
| b. Other Types of Recognition (PWTD) | Yes | No | N/A x |

N/A

**D. Promotions**

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

- |  |     |    |       |
|--|-----|----|-------|
| a. SES                                 |     |    |       |
| i. Qualified Internal Applicants (PWD) | Yes | No | N/A x |
| ii. Internal Selections (PWD)          | Yes | No | N/A x |
| b. Grade GS-15                         |     |    |       |
| i. Qualified Internal Applicants (PWD) | Yes | No | N/A x |
| ii. Internal Selections (PWD)          | Yes | No | N/A x |
| c. Grade GS-14                         |     |    |       |
| i. Qualified Internal Applicants (PWD) | Yes | No | N/A x |
| ii. Internal Selections (PWD)          | Yes | No | N/A x |
| d. Grade GS-13                         |     |    |       |
| i. Qualified Internal Applicants (PWD) | Yes | No | N/A x |
| ii. Internal Selections (PWD)          | Yes | No | N/A x |

N/A



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

a. SES			
i. Qualified Internal Applicants (PWTD)	Yes	No	N/A x
ii. Internal Selections (PWTD)	Yes	No	N/A x
b. Grade GS-15			
i. Qualified Internal Applicants (PWTD)	Yes	No	N/A x
ii. Internal Selections (PWTD)	Yes	No	N/A x
c. Grade GS-14			
i. Qualified Internal Applicants (PWTD)	Yes	No	N/A x
ii. Internal Selections (PWTD)	Yes	No	N/A x
d. Grade GS-13			
i. Qualified Internal Applicants (PWTD)	Yes	No	N/A x
ii. Internal Selections (PWTD)	Yes	No	N/A x

N/A

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

a. New Hires to SES (PWD)	Yes	No	N/A x
b. New Hires to GS-15 (PWD)	Yes	No	N/A x
c. New Hires to GS-14 (PWD)	Yes	No	N/A x
d. New Hires to GS-13 (PWD)	Yes	No	N/A x

N/A

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

a. New Hires to SES (PWTD)	Yes	No	N/A x
b. New Hires to GS-15 (PWTD)	Yes	No	N/A x
c. New Hires to GS-14 (PWTD)	Yes	No	N/A x

d. New Hires to GS-13 (PWTD) Yes No N/A x

N/A

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

a. Executives

i. Qualified Internal Applicants (PWD) Yes No N/A x

ii. Internal Selections (PWD) Yes No N/A x

b. Managers

i. Qualified Internal Applicants (PWD) Yes No N/A x

ii. Internal Selections (PWD) Yes No N/A x

c. Supervisors

i. Qualified Internal Applicants (PWD) Yes No N/A x

ii. Internal Selections (PWD) Yes No N/A x

N/A

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

a. Executives

i. Qualified Internal Applicants (PWTD) Yes No N/A x

ii. Internal Selections (PWTD) Yes No N/A x

b. Managers

i. Qualified Internal Applicants (PWTD) Yes No N/A x

ii. Internal Selections (PWTD) Yes No N/A x

c. Supervisors

i. Qualified Internal Applicants (PWTD) Yes No N/A x

ii. Internal Selections (PWTD) Yes No N/A x

N/A

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

a. New Hires for Executives (PWD)	Yes	No	N/A x
b. New Hires for Managers (PWD)	Yes	No	N/A x
c. New Hires for Supervisors (PWD)	Yes	No	N/A x

N/A

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

a. New Hires for Executives (PWTD)	Yes	No	N/A x
b. New Hires for Managers (PWTD)	Yes	No	N/A x
c. New Hires for Supervisors (PWTD)	Yes	No	N/A x

N/A

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

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

**A. Voluntary and Involuntary Separations**

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

Yes No N/A x

HR data was not available at the time of this reporting.

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

a. Voluntary Separations (PWD)	Yes x	No
--------------------------------	-------	----

b. Involuntary Separations (PWD) Yes    No

PWD separated from the agency at a higher rate in comparison to those with no disabilities. Most of these separations were categorized as resignation or other. More information and analysis will be needed to determine the root cause of these separations. The agency did not have HR analytics personnel or resources to determine if this was a trigger.

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

a. Voluntary Separations (PWTD) Yes    No   
 b. Involuntary Separations (PWTD) Yes    No

N/A

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

N/A

**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.

The internet address is <https://www.dfc.gov/accessibility-statement>.

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.

DFC is coordinating to update its public-facing website to include information about the Architectural Barriers Act, to include details on how to file a complaint.

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.

Planned and completed activities for FY23 and FY24 include:

- Drafted an agency Section 508 Policy, which is pending finalization.
- Completed the FY23 Government-Wide Section 508 Assessment.
- Conducted web site testing inclusive of manual and automated testing.
- Created an Accessibility Resource Hub on SharePoint.
- Implemented a file remediation process inclusive of DOCs, PDFs, PPTs, etc.

### **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.)

In FY23, we received 37 requests for accommodation: 31 were approved as requested, 4 were approved with modification, and 2 were not finalized by the employee. The average time for completion was 13 calendar days.

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 FY23, RA requests were processed in an efficient and timely manner. The average completion time was well within the limits outlined in Agency policy.

### **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.

DFC has a PAS policy, but it was not evaluated as there were no requests for PAS in FY23.

**Section VI: EEO Complaint and Findings Data**

**A. 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?  
Yes    No    N/A x
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?  
Yes    No    N/A x
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

**B. EEO Complaint Data involving Reasonable Accommodation**

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?  
Yes    No    N/A x
2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?  
Yes    No    N/A x
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

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

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

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect

employment opportunities for PWD and/or PWTD?

Yes No x

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

Yes No x

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

Yes No N/A x

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

N/A

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

N/A

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

N/A

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

**CERTIFICATION of ESTABLISHMENT of CONTINUING EQUAL  
EMPLOYMENT OPPORTUNITY PROGRAMS**

I, **Neonu Jewell/Chief Equal Opportunity, Diversity, & Inclusion Officer/AD/00** am the  
(Insert name above) (Insert official title/series/grade above)

Principal EEO Director/Official for **U.S. International Development Finance Corporation**  
(Insert Agency/Component Name above)

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

The agency has also analyzed its work force profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice is operating to disadvantage any group based on race, national origin, gender or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.

**NEONU JEWELL** Digitally signed by NEONU JEWELL  
Date: 2024.03.11 14:33:51 -04'00'

March 11, 2024

Signature of Principal EEO Director/Official  
Certifies that this Federal Agency Annual EEO Program Status Report complies with EEO MD-715.

Date

Signature of Agency Head or Agency Head Designee



Date 3/22/2024