





This report is a product of the <u>Diversity</u>, <u>Equity</u>, <u>Inclusion</u>, <u>and Accessibility</u> <u>Committee</u> of the Council of the Inspectors General on Integrity and Efficiency.

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## **Version Notes**

Version 1 (June 2022)

### Version 2 (October 2023):

- Added section "Our Access" with information on accessibility.
- Added information about the first <u>CIGIE job fair</u>.
- Added the "<u>Toolkit for Considering Equity When Conducting Oversight</u> Work."
- Updated routes and information in the section "<u>Safe and Harassment-Free Workplaces</u>."
- Minor formatting changes and edits throughout, including updating text to reflect change from working group to committee.







### Introduction

This roadmap includes routes and actions for Offices of Inspectors General (OIGs) to use in advancing diversity, equity, inclusion, and accessibility (DEIA) in the following areas.

**OUR PEOPLE.** This section includes four internally focused functional areas:

- Continuous Education
- Staffing, Recruitment, and Hiring
- Promotions and Professional Development
- Performance, Recognition, and Awards

**OUR BUSINESS.** This section includes two externally focused functional areas:

- Business Supplier Diversity
- Stakeholders and Partners

**OUR WORKPLACES.** This section includes information on the following functional area:

• Safe, inclusive, and harassment-free workplaces.

<u>OUR ACCESS</u>. In addition to the content included throughout the roadmap related to accessibility, this section includes more detailed information on the following functional area:

Accessibility

**OUR PROGRESS.** This section includes area related to measuring our progress:

• Data Collection, Assessment, and Reporting

Each of the areas above includes goals, which we refer to as "routes," to help an OIG advance in that area. Each route includes a list of specific steps an OIG can take, as well as expected results you'll see from taking those steps, and metrics for measuring progress. As OIGs consider which routes and actions will be most appropriate and beneficial to their specific office, they should also ensure they protect employee privacy in all actions, especially any that include tracking and reporting of protected groups.

We intend for this document to inspire positive change and open further conversations and collaboration throughout the OIG community. This represents the next stage in our journey together to drive innovation and position OIGs as model employers that value and promote equity for all Americans.

### Who is This Document For?

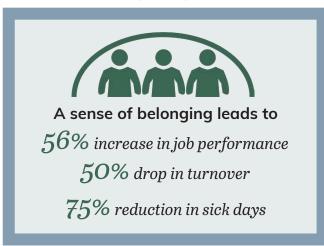
This roadmap is a tool for all OIGs. The goals and actions offered here can be used by OIG senior executives, managers, team leads, human resources staff, diversity and inclusion offices and teams, and staff to advance DEIA initiatives in their offices. In building this roadmap, we ensured each section included actionable steps any OIG can take, regardless of size and current state of their DEIA initiatives. We factored in the unique opportunities and considerations for OIGs of all sizes, whether an OIG has a few staff members or more than a thousand, and whether it already has a leadership team dedicated to DEIA initiatives or an ad hoc group of staff members who see opportunities for incremental change.

### Why Should OIGs Seek to Advance DEIA?

The Council of the Inspectors General on Integrity and Efficiency's (CIGIE) commitment to DEIA in the OIG community is more than a program or policy; it is one of its foundational principles. As demonstrated in its <a href="FYs 2023-2027">FYS 2023-2027</a> Strategic Plan, CIGIE is committed to addressing the integrity, economy, and effectiveness issues that transcend individual Government agencies. A diverse, equitable, inclusive, and accessible organization will allow all OIGs to increase their professionalism and effectiveness of their personnel and will aid in the establishment of a well-trained and highly skilled workforce.

Embracing diversity and supporting equal opportunities, inclusion, and accessibility is the right thing to do from a moral and ethical standpoint. But it also improves organizational performance and results. The following are some areas in which organizations can find measurable improvements by advancing DEIA efforts.

 Performance. Diverse perspectives and talents enhance performance, productivity, and results across an organization. Diverse organizations are better able to serve diverse customers and communities. A McKinsey and Company study that covered 366 public companies in a variety of countries and industries found more ethnically and gender diverse companies performed significantly better than others. • Talent. Organizations that embrace and support DEIA initiatives attract, acquire, and maintain top talent. A study of more than 1,300 full-time employees found that an inclusive culture is key to both hiring and retaining talent, and 80 percent of respondents said that inclusion is an important factor in choosing an employer. Nearly a quarter of all respondents left jobs due to lack of diversity and inclusion. An inclusion strategy is key to retaining a diverse workforce.



- Engagement. Employees in organizations that foster a culture of inclusivity and accessibility are more engaged with each other and their work, and they are more committed to the mission.
   A BetterUp study found that a sense of belonging is linked to a 56-percent increase in job performance, a 50-percent drop in turnover risk, and a 75-percent reduction in sick days.
- Creativity. DEIA fosters creativity and innovation. Employees who feel
  respected and valued for their individual perspectives are more likely to
  bring forward new ideas and approaches to problem-solving. Leaders
  who give diverse voices equal attention unleash value-driven insights,
  and employees in a "speak up" culture are 3.5 times more likely to
  contribute their full innovative potential.
- **Intellect.** Diverse groups are 58 percent more accurate in problem solving as compared to homogeneous groups. Collective and individual intelligence increases in diverse groups.

### What Does DEIA Mean?

Diversity, equity, inclusion, and accessibility are a combination of concepts essential to preventing bias and discrimination of various types while encouraging best outcomes for organizations by maximizing potential and applying moral continuity both inward and outward. Engagement represents the environment in which these concepts operate together.

**Diversity** is a collection of individual attributes that together help agencies pursue organizational objectives efficiently and effectively. Examples of these attributes include characteristics such as national origin, language, race, color, disability, ethnicity, gender, age, religion, sexual orientation, gender identity, socioeconomic status, veteran status, and family structures. Diversity also encompasses differences among people based on their backgrounds: where they are from, where they have lived, and differences of thought and life experiences.

Accessibility is the design, construction, development, and maintenance of facilities, information and communication technology, programs, and services so that all people, including people with disabilities, can fully and independently use them. Accessibility includes the provision of physical and attitudinal barriers to equitable opportunities, a commitment to ensuring that people with disabilities can independently access every outward-facing and internal activity or electronic space, and the pursuit of leading practices such as universal design.

impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latino, Indigenous, and Native American persons, Asian Americans and Pacific Islanders, and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, queer, intersex, and asexual (LGBTQIA+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.

Inclusion is a culture that connects each employee to the organization. This type of organizational culture encourages collaboration, flexibility, and fairness; and leverages diversity throughout the organization, so that all individuals can participate and contribute to their full potential.

**Engagement** is an employee's sense of purpose that is evident in their display of dedication, persistence, and effort in their work or overall attachment to their organization and its mission.

### **Commitment and First Steps**

Advancing DEIA efforts on a systemic and organizational level requires the commitment of staff at all levels. A culture of belonging for everyone in the OIG, including senior leaders, managers, and employees, is critical for sustaining a diverse, equitable, inclusive, and accessible work environment and workplace.

When leaders are committed to DEIA, employees' sense of inclusion nearly doubles. Through their attitude and actions, senior leaders can build a sense of community and social responsibility in which each staff member feels included, valued, respected, and heard. Dedicating resources to DEIA efforts and promoting DEIA as a cross-functional, office-wide priority are crucial steps to demonstrating this commitment.

Senior leaders and managers can engage in and encourage their staff to participate in #SEED: Support—Engage—Educate—Data, four steps we can all take to help mature DEIA throughout the OIG community. Specifically:

 Support: Commit to, participate in, and provide for representatives to assist with advancing DEIA in the OIG community and your respective

- offices. Vocally commit and then take the necessary actions to back up the words. A solid track record validates commitment levels.
- **Engage:** Foster engagement, make assessments, and implement DEIA Committee efforts that apply to your respective offices. Integrate DEIA into decision-making and performance measurement.
- **Educate:** Enhance DEIA competence through methods such as speakers, videos, and sharing DEIA Committee products with staff.
- **Data:** Use data and technology to share information and leading practices.

### How to Get Started: Senior Leaders and Managers

- Decide how your organization defines diversity, equity, inclusion, and accessibility. You can use the definitions above or start with them as a jumping-off point.
- Identify who in your organization will lead your DEIA program efforts.
- Sign up for the <u>U.S. Postal Service OIG collaboration site</u>, request access to the <u>CIGIE DEIA collaboration site</u>, and ensure your DEIA staff have access to it as well. Once access is granted, start collaborating. As appropriate, request access to subgroup sites focused on the areas this roadmap covers.
- Gather data to assess where you stand in terms of DEIA. This will help
  you determine what areas you would like to sustain and improve on and
  allow you to track your progress. One tool that can help is a Diversity,
  Equity, Inclusion, and Accessibility Maturity Model; it can help you see
  where your organization is in terms of workplace (culture), workforce
  (people), work focus on DEIA, and suppliers (contract support).
- Based on data gathered and results of the maturity model, develop a strategy to address your needs and interests related to DEIA. Include what goals, actions, and measures—measures that focus on hiring, training, developing, recognizing, rewarding, promoting, and retaining diverse individuals—you will use to move your organization forward on the maturity model.
- Review the roadmap and determine what areas your OIG should focus on and how to incorporate those areas into strategic planning, budgeting, OIG initiatives, etc.

### **How to Get Started: Employees**

- Sign up for the GovDelivery updates specific to DEIA.
- Signing up for those updates will also subscribe you to <u>The Ally</u>, which is the CIGIE DEIA Committee's newsletter. Submit articles for the "Our Voices" feature to tell your DEIA story.

- Volunteer to establish or support existing DEIA efforts within your office, such as helping with newsletters, DEIA events, surveys, training, awareness campaigns, and so on.
- Participate in DEIA events at your OIG, your agency or department, and CIGIE, including monthly DEIA Committee meetings.
- Learn about your role in making OIG work products accessible to people with disabilities, including identifying your OIG's, agency's, or department's policies for creating accessible documents, presentations, web content, and applications.
- Review this roadmap for areas specifically related to your job, and work with your supervisors and managers on ways you can help support these efforts.

## **About the Committee**

This roadmap was created by the CIGIE Diversity, Equity, Inclusion, and Accessibility Committee. For questions, contact Dorona Chappelle at <a href="Dorona">Dorona</a>. <a href="Chappelle@ed.gov">Chappelle@ed.gov</a>.

### **Mission**

The Diversity, Equity, Inclusion, and Accessibility Committee looks to affirm, advance, and augment CIGIE's commitment to promote a diverse, equitable, and inclusive workforce and workplace environment throughout the OIG Community that will help ensure comprehensive work, produced by a well-trained and highly skilled workforce, to be made accessible, when possible, to the diverse public we serve.





Sandra D. Bruce, Chair Inspector General U.S. Department of Education

Stefania Pozzi Porter, Vice Chair Inspector General U.S. AbilityOne Commission



Read more about the committee's purpose, operations, and

responsibilities of members in its charter.

### **Other Committee Activities**



Every other month, the committee publishes *The Ally*, a newsletter that is designed to enhance continuous education and awareness and advance DEIA throughout the OIG community.





The committee consults with and coordinates with other CIGIE committees and forums, including the Training Institute, the Professional Development Committee, and the Pandemic Response Accountability Committee, as appropriate.



The committee has a technology presence on Oversight.gov. This collaboration site provides information about the framework and actions of the committee. The committee also has a presence on IGNET.gov.

The committee has been featured on Government Matters, Federal News Network, and Government Executive outlining the purpose, importance, and roadmap for advancing DEIA throughout the OIG community.



## Our People

## People are our greatest asset.

Comprehensive human capital strategies clearly aligned with diversity, equity, inclusion, and accessibility strategies throughout an employee's life cycle help to attract and retain a diverse and skilled workforce and promote the OIG community as a premier workforce within the Federal government. By focusing on continuous education; staffing, recruitment, and hiring; promotions and professional development; and performance, recognition, and awards, the OIG community can make meaningful and sustainable progress with investing in our people.



## **Continuous Education**

Continuous education is a foundational building block for advancing DEIA within an organization. Through ongoing training, awareness activities, and collaboration, the OIG community can strengthen the competency, motivation, and retention of a talented and diverse workforce, one that values and embraces the contributions of all its members.

Why does continuous education matter? For leaders, it can help equip them with DEIA knowledge and skills. As a result, leaders can more effectively manage their workforce and create a safe work environment in which everyone has equitable access and respect.

For people who have less representation in leadership roles, certain jobs, decision making, or parts of the community—people of color, women, the LGBTQIA+ community, people with disabilities, etc.—continuous education programs are an effective first step to show that the OIG knows it can do better and it is committed to change.

### Alignment with Committee Strategic Goals

This section aligns with the following strategic goals from the DEIA Committee Charter:

- Increase collaboration among the OIG community to identify training and awareness resources that promote DEIA.
- Promote effective training and awareness resources to enhance DEIA across the OIG.

For people who are ambivalent or actively resistant to DEIA programs, continuous education is the start of a conversation to help them understand what DEIA means and why it's needed. People may have fears about DEIA programs: Will I have to share personal information about my background or religion? Will we be forced to hire less qualified people? Will I be excluded from jobs or leadership roles because I'm not in a protected group? Continuous education can help address these fears and is the first essential step to gaining buy-in for further action.

For everyone, continuous education helps foster conversations and connections, which are necessary for building inclusion and accessibility into the culture of the OIG. We must be aware of different perspectives and learn steps we can take to ensure those differences are included in our decision making and processes. Doing so enhances our office culture, our work products, and our effectiveness.

The following sections outline actions OIGs can take along three routes towards advancing DEIA: training, awareness, and collaboration.



# Training: Incorporate diversity, equity, inclusion, and accessibility courses and topics into your agency training program or efforts.

- 1. Provide sufficient financial and staff resources for DEIA training program.
  - a. Incorporate DEIA training activities in the OIG's budget planning, formulation, and execution process. If possible, plan beyond one fiscal year. This will allow the OIG to provide interconnected training sessions over a long period of time (for example, a series of sessions relating to unconscious bias, or creating a culture of belonging).
  - b. Consider the best options for training delivery, which may involve any or all of the following depending on your available resources.
    - Identify current staff or hire staff with sufficient training skills and subject matter knowledge to provide DEIA training.
    - Invest in "train the trainer" courses to build current staff capacity and provide necessary skills to develop and present DEIA training.
    - Identify and plan DEIA training available from others, such as contractors, staff from your department or agency, or staff from another OIG.

## 2. Catalog and use resources to support and sustain continued DEIA training program.

- a. Create a catalog of past training materials and presentations. We recommend assessing content from the past 3 to 5 years to identify training that is DEIA-specific or that will address DEIA areas of concern to your OIG. The following are possible sources you may consider.
  - Assess training already provided to your OIG, your department or agency, and external parties.
  - Consult with your department or agency diversity office to determine existing DEIA training that is available.
  - Review the CIGIE DEIA collaboration site for information about vendors specializing in DEIA training.
  - Consult with other OIGs that have established DEIA training programs; collaborate when possible and as needed.
- Review DEIA websites of other Federal agencies (not limited to OIGs) to obtain ideas, suggestions, and leading practices regarding DEIA training programs.

### 3. Maintain a formal DEIA training program.

- a. Notify OIG employees of the DEIA training program. Ideally, this will be done in several ways, including through all-OIG email messages, blog posts, webinars, town hall meetings, and the supervisory chain of command.
- b. Issue new or update existing training policy documents to ensure that DEIA is formally established in the training program.
- c. Budget for and spend sufficient funds to maintain the training program.
- d. Hire and maintain dedicated DEIA staff to conduct regular DEIA training, or establish annual contracts with external parties (your department or agency, other OIGs, contractors) to provide required training.
- e. Develop or purchase DEIA training materials and presentations.
- f. Collaborate with your OIG, department, or agency training program coordinator to catalog other available trainings and workshops that may not have DEIA in the title but
  - support efforts to enhance employees' sense of belonging,
  - assist with identifying unique strength and transferable skills, or
  - support team building and continuous improvement.

- Examples include Gallup CliftonStrengths workshops, DISC assessment workshops, Servant Leadership training, and other development trainings and workshops.
- g. Establish a schedule of DEIA training activities. Coordinate with your OIG, department, or agency training program staff to avoid conflicts and ensure maximum participation.
- h. Regularly (at least annually) conduct DEIA-specific training for all OIG employees.
- i. Leverage technology. This can include hosting or participating in virtual events that allow people to attend from a variety of locations, as well as technology to increase engagement during virtual training (online polls and surveys, breakout rooms to foster small group conversation and connection, multimedia presentations, etc.).
- j. Ensure training is accessible to people with disabilities. This may include using technology like captioning for live streams, virtual meetings, and videos, as well as ensuring documents are accessible to people using assistive technology (compliant with Section 508 of the Rehabilitation Act).

- 1. Enhanced ability to coordinate, facilitate, or provide DEIA training to OIG staff.
- 2. Increase in opportunities to promote Federal employment and advancement opportunities for qualified disabled veterans through the Disabled Veteran Affirmative Action Program.
- 3. A maintained list of potential resources (training programs and contacts) that can be pursued as needed. Small OIGs and those without dedicated DEIA or training staff may need to maintain a central list of points of contact. At a minimum, we recommend the CIGIE DEIA collaboration site and the department's or agency's DEIA and training offices.
- 4. Increase in the ability to plan DEIA training activities in advance.
- 5. DEIA training activities are fully incorporated into OIG's policies and training programs.
- 6. Increase in opportunities to maintain a range of courses, job aids, and resources related to OIG DEIA efforts.
- 7. Organizational development sessions on valuing, respecting, and treating employees fairly.
- 8. Individual assessment services for individual employees and teams that include team building or development activities or team-dedicated leadership development workshops or services.

- 9. All OIG employees understand the purpose of and intent of the DEIA program.
- 10. All OIG employees regularly receive impactful DEIA training and awareness opportunities.



## Awareness: Conduct regular activities to promote DEIA awareness within the OIG.

### How Can We Get There?

- 1. Develop library or catalog of existing resources for DEIA awareness program.
  - a. Consult with your department or agency diversity office to determine what established DEIA awareness programs are available, and as appropriate, promote such programs for OIG staff.
  - b. Subscribe to listservs and participate in Federal agency DEIA groups to obtain information about upcoming events and activities.
  - c. Gather information and resources to develop a DEIA library, including ideas and leading practices, for use in future events and programs.
- 2. Establish a team of employees (for example, a formal or informal DEIA committee or internal working group) to plan awareness activities.
  - a. Depending on available resources, this may include any combination of the following:
    - hiring or maintaining dedicated DEIA staff,
    - using existing Special Emphasis Programs managers and other support staff to lead or conduct the team, and
    - seeking volunteers from workforce to hold informal meetings to brainstorm and gather ideas.

If an OIG does not have sufficient staff to establish a working group, it can use surveys, lunch and learn gatherings, focus group discussions, and other informal mechanisms to get input from staff.

 Provide continuous education for assigned staff on DEIA subject matter, as appropriate. This may include sending DEIA staff and other working group members to DEIA-related conferences and affinity group meetings.

### 3. Conduct activities relating to key DEIA events and issues.

- a. Notify employees of upcoming events using all available messaging systems, including all-employee emails, blog posts, newsletters, computer alerts, etc.
- b. Hold DEIA awareness events.
  - Events can be formal (guest speakers or panels, cultural events cosponsored with affinity groups and employee organizations) or informal (lunch-and-learns, employee field trips to cultural exhibits, memorials, or museums).
  - Initial activities may focus on specific observances (e.g., Women's History Month) and be held only once a month. As resources (time and staff) increase, the OIG may expand activities and announcements throughout the year. For example, an LGBTQIA+ program may conduct activities in June (Pride Month), October (LGBT History Month, National Coming Out Day), November (Transgender Day of Remembrance), and other months.
  - Fully established programs can also hold events that consider the intersection of multiple identities into their programs. For example, they may host an event focusing on issues that affect Black women or Native Americans in the LGBTQ+ community.

### What Should We See?

- 1. Increase in capacity to hold awareness activities.
- 2. Increase in the number of activities held.
- 3. Increase in employee engagement with DEIA activities (both from participating team members and attendance at more events).
- 4. Increase in employee knowledge of available DEIA activities.
- 5. Increase in understanding of DEIA by the workforce.



Collaboration: Engage with internal and external partners to optimize the success of DEIA training and awareness initiatives.

### **How Can We Get There?**

1. Create and maintain a list of DEIA contacts, using results of work from Routes 1 and 2 as appropriate.

## 2. Enhance collaboration between OIG human resources, Equal Employment Opportunity, and DEIA offices and functions.

- a. Clarify (or initially define, if necessary) the role of each office and function in DEIA initiatives, and delegate joint assignments as applicable.
- b. Conduct learning sessions for employees, supervisors, and managers to increase their understanding of the difference between human resources, Equal Employment Opportunity, and DEIA offices and functions.
- c. Human resources, Equal Employment Opportunity, and DEIA staff meet regularly to coordinate projects and initiatives, as applicable.

## 3. Engage internal and external partners to assist in creating a robust, collaborative DEIA program.

- a. Promote DEIA communications from external partners (listservs, articles, event announcements, etc.).
- b. When planning events, consider including external speakers to bring in outside viewpoints.
- c. Develop programming that encourages collaboration within the OIG.
- d. Offer various avenues for all OIG staff to share their perspectives, suggestions, and feedback (e.g., participation in group discussions or individual communication of ideas through emails).
- e. Keep the CIGIE/OIG community informed of each stage of your department's or agency's process.

### What Should We See?

- 1. An up-to-date contact list of partners for DEIA continuous education.
- 2. Increase in communication and understanding of different roles of the three functions (human resources, Equal Employment Opportunity, and DEIA) agency-wide.
- 3. Human resources, Equal Employment Opportunity, and DEIA offices and functions collaborate, share responsibilities, and jointly contribute to initiatives where the three areas overlap.
- 4. Continuous education efforts are aligned.
- 5. DEIA initiatives include diverse viewpoints.
- 6. Healthy work relationships are fostered.
- 7. Creative ideas and innovative solutions are brought together.
- 8. More impactful learning experiences.

### **How Do We Measure Progress?**

The following table provides metrics for measuring progress in the area of continuous education.

Table 1. Measuring Progress for Continuous Education

Level	Description
4—Optimized	OIG has formally incorporated DEIA continuous education into its mission and guiding principles. Consistent with current leading practices, OIG regularly promotes and/or conducts DEIA events throughout the year; provides or otherwise ensures access to DEIA training for all staff; and, as appropriate and resources allow, collaborates with other OIGs in DEIA activities, trainings, and other continuous education events for the entire OIG community.
3—Progressive	OIG has established policies and procedures to advance DEIA throughout the organization. OIG implements these policies and procedures in various ways, including but not limited to ensuring that all OIG staff have access to regular DEIA training and that OIG consistently promotes DEIA activities for optimal awareness. OIG routinely assesses its DEIA continuous education and uses the results of such assessments to determine areas of potential improvement.
2—Defined	OIG provides required DEIA training to its staff and shares DEIA information and promotes DEIA activities to the extent that Federal laws and other mandates require such training and activities.
1—Ad Hoc	OIG has not formally incorporated DEIA continuous education initiatives into its goals and strategies. However, it still may make DEIA training available to staff and announce DEIA events that OIG staff can attend.

### How Should We Report Results?

- OIGs are encouraged to keep a record of DEIA training that they provided or otherwise made available to OIG staff, DEIA activities and programs that are held and promoted, attendance records, and other feedback from staff about such events (e.g., post attendance surveys). OIGs can and should use these records to establish internal baseline information and progress.
- As appropriate, OIGs can report information through various mechanisms to internal and external stakeholders, including but not limited to all-OIG messages (e.g., webinars, email blasts), Semiannual Reports to Congress, Congressional hearing testimony, and Management Directive 715 reports to the Equal Employment Opportunity Commission (EEOC).
- CIGIE may send out data calls for information about DEIA training and awareness activities to assess the overall community's progress

in advancing DEIA. This will be measured against baseline data and subsequent survey data obtained during the CIGIE DEIA Committee surveys.

### What References and Resources Can Help?

### **Legal Authorities**

- Government Employees Training Act, 5 U.S.C. §§ 4101-4121
- Section 9 of <u>Executive Order 14035</u>, "Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce," June 25, 2021
- <u>5 C.F.R. 410</u> (Training)
- <u>5 C.F.R. 412</u> (Supervisory, Management, and Executive Development)

#### **Federal Resources**

- <u>CIGIE Training Institute</u>. DEIA content under development.
- <u>EEOC Training Institute</u>. Focus is on Equal Employment Opportunity programs, but also has courses on barrier analyses, Management Directive 715, etc. Can help OIGs assess their DEIA efforts as part of an overall model Equal Employment Opportunity program.
- <u>EEOC No-Cost Outreach Programs</u>. Outreach programs provide general information about the EEOC, its mission, the employment discrimination laws enforced by the Commission, and the charge and complaint process. Representatives are available on a limited basis at no cost to make presentations and participate in meetings, conferences, and seminars with employee and employer groups, professional associations, students, nonprofit entities, community organizations, and other members of the general public.
- Hispanic Employment Statistical Annual and Semiannual Reports. The
  U.S. Office of Personnel Management (OPM) annual reports may contain
  examples from Federal agencies about training activities that may be
  of interest to OIGs. As of March 1, 2022, the most recent report was
  from FY 2018. However, the available reports may still provide resource/
  contact information. Be sure to review your own OIG's, department's, or
  agency's report as well.

### **Terminology**

- Awareness. A state of knowing, gained through one's own perceptions or by means of outside information, and having concern about and wellinformed interest in a particular situation or development.
- **Training.** The process of transferring knowledge, skills, values, beliefs, experiences, and habits of a person or group to others through storytelling, discussion, teaching, education, or research.



## Staffing, Recruitment, and Hiring

Creating a talent pipeline that is reflective of the best people with different backgrounds and perspectives leads to better decision-making and increased creativity, critical thinking, productivity, and innovation. With high levels of competition for top talent in today's labor market, taking deliberative actions to recruit, hire, and develop this talent can provide the OIG community with a competitive advantage and reputation.

Workforce sustainability is about attracting and retaining the right people with the right skills and abilities to meet mission needs. Being forward leaning requires a comprehensive evaluation of talent acquisition and losses with a strategic approach to improving recruitment and hiring outcomes. OIGs need to assess

barriers—real and perceived—to ensure equity and access to the opportunities and benefits of merit-based employment. As the American workforce continues

### Alignment with Committee Strategic Goals

This section aligns with the following strategic goals from the DEIA Committee Charter:

 Identify and promote successful techniques for integrating DEIA into human capital strategies to attract, recruit, and sustain talent. to become more diverse, the OIG community must be intentional in adapting innovative strategies to better identify applicants from all groups, especially traditionally underrepresented communities.

The routes and actions in this section help OIGs accomplish the following.

- Demonstrate top leadership commitment to staffing, recruitment, and hiring, which are integral components for making meaningful and sustainable progress.
- Promote a clear alignment of DEIA strategies throughout the employee life cycle.
- Promote the OIG community as a premier workforce within the Federal government through OIG- and CIGIE-sponsored recruiting events.
- Develop comprehensive recruitment and hiring strategies to attract a diverse and skilled OIG workforce.



# Staffing: Develop workforce planning processes that provide opportunities to recruit and hire diverse talent.

- 1. Include commitment to and support of <u>DEIA initiatives</u> as part of the OIG's strategic or human capital plan.
  - a. Develop quarterly reports on professional development, attrition, rewards, retention, and promotion action by race, national origin, gender, disability, and veteran status.
  - b. Conduct annual human capital planning discussions with senior leaders, hiring officials, and managers to develop a targeted hiring and recruitment plan.
  - c. Conduct annual mandatory unconscious bias training for leaders, managers, and staff involved in staffing, recruitment, and hiring activities.
  - d. Analyze student internship and fellowship programs compared with agency workforce demographics. Maximize the use of the Pathways Program to attract and develop top talent.

- 1. Increase in the overall demographic diversity of the OIG workforce including in leadership positions.
- 2. Increase in the percentage of applicants from underrepresented groups selected for student programs and fellowships.



Recruitment: Increase the breadth and frequency of outreach and engagement with professional organizations and institutions of higher education for historically underrepresented groups to improve the diversity of applicant pools.

- 1. Collaborate across the CIGIE community to share outreach and recruitment activities.
  - a. Encourage OIG Human Capital or Human Resources offices to coordinate across CIGIE to use local OIG staff as recruiters at local job fairs, forums, and other outreach events.
  - b. Post outreach and recruitment activities on IGNET.gov to share information to the CIGIE community.
- 2. Increase the percentage of applicants from traditionally underrepresented groups for key occupations, such as law enforcement positions, auditors, and program managers.
  - a. Broaden outreach and marketing strategies to institutions serving communities that have been historically underrepresented in the Federal government to increase the pool of applicants. You may need to develop Memorandums of Understanding on collaborative efforts.
  - b. Use inclusive language and images in recruitment materials and job announcements, including on public websites. See the <u>Diversity</u> <u>Movement</u> for guidance on inclusive language.
  - c. Build partnerships with professional organizations representing communities that have been historically underrepresented in the Federal government. For more information, see the <u>Directory of Organizations Serving Underrepresented Populations</u>.
  - d. Craft inclusive messaging targeted to underrepresented groups and to different generations (midcareer workers, Millennials, Gen Z, etc.) to convey that they are welcomed in the OIG workforce.

- e. Ensure a diverse pool of recruiters, including targeted representation from people with disabilities.
- 3. Establish a tool to track and measure the outcomes of recruitment strategies and activities.
  - a. Generate and disseminate quarterly dashboard reports to OIG senior leadership conveying the status of organization workforce diversity to ensure that outreach and recruitment strategies are effective.
  - b. Use available demographic data to assess the diversity of applicants, when available, per specific vacancy announcements. Consistent with EEOC and OPM guidance, an applicant tracking system would help identify (1) who applied, (2) who qualified, (3) who was referred, (4) who was interviewed, and (5) who was selected.

- 1. Increase in the number of outreach and recruitment activities with all colleges and universities, especially minority professional organizations, from current baseline.
- 2. Increase in the number of diverse applicants per vacancy announcement.
- 3. Increase in the number of recruiters from all, especially underrepresented groups.



### **Road Trip: Recruitment Principles** in Action

and hiring of a diverse workforce, in March 2023, the CIGIE held its first-ever career fair in Washington, DC. Hosted by the CIGIE DEIA Committee and the U.S. Department of Transportation OIG, more than 300 college students, recent college grads, and job seekers registered for the event, with 32 OIGs on-site to share information on career and internship opportunities. The team conducted in-person outreach to more than 20 colleges and universities in the DC area, including Howard University and Gallaudet University, and created recruitment materials that were shared with Veterans, professional, and alumni networks and schools across the country. Due to the success of the event, the CIGIE will host a second career fair in November 2023.



Hiring: Leadership provides direction, vision, and commitment to hiring applicants from all groups and creating a diverse workforce and an inclusive organizational culture, which ultimately yields higher performing organizations.

### How Can We Get There?

- 1. Establish accountability by including DEIA elements in annual performance plans for senior executives and hiring officials.
  - a. Develop policy recommending the use of diverse interview panels and appoint diverse panels (including members from across the OIG community) to review applications and conduct interviews. Ensure that Human Resources office briefs panel members on expectations and procedures for reviewing applications and conducting interviews.
  - b. Increase awareness of and eliminate potential biases and unnecessary requirements in vacancy announcements that may disqualify otherwise qualified applicants.
  - c. Develop a dashboard or other tool to track hiring outcomes, including the number of diversity applicants selected for interviews and hired.
  - d. Provide quarterly reports of activities to senior leadership that will be used to factor in the overall performance rating.

### What Should We See?

- 1. Increase in the diversity of applicants interviewed and selected for critical positions.
- 2. Increase in the use of Special Hiring Authorities for the recruitment and hiring of individuals with disabilities.
- 3. OPM hiring goals are met for individuals with disabilities, individuals with targeted disabilities, and veterans.
- 4. Increase in the percentage of applicants from underrepresented groups selected for student programs and fellowships.

### **How Do We Measure Progress?**

The following table provides metrics for measuring progress in the areas of staffing, recruitment, and hiring.

Table 2. Measuring Progress for Staffing, Recruitment, and Hiring

Level	Description
4—Optimized	The OIG consistently demonstrates current leading practices in the advancement of diversity, equity, inclusion, and accessibility in staffing, recruitment, and hiring policies and procedures. Diversity, equity, inclusion, and accessibility are key components of the OIG's mission and guiding principles.
3—Progressive	The OIG consistently implements staffing, recruitment, and hiring policies and procedures to advance diversity, equity, inclusion, and accessibility throughout the organization. The effectiveness of diversity and inclusion practices is routinely assessed, and the results of the assessments inform improvements.
2—Defined	Staffing, recruitment, and hiring practices to advance diversity, equity, inclusion, and accessibility are primarily implemented to comply with relevant laws and mandates.
1—Ad Hoc	Staffing, recruitment, and hiring practices have not been formally incorporated as part of the OIG's goals and strategies.

### How Should We Report Results?

Conduct workforce data analysis to identify low participation rates among diverse staff and issues in the recruitment and hiring from underserved communities. These data will help establish structured planning and approaches to address implicit biases and promote a clear alignment of DEIA strategies throughout the employee life cycle.

See action items above for suggested frequency for reporting of key data and outcomes.

### What References and Resources Can Help?

- OPM, Policy, Data, Oversight: Diversity and Inclusion. Provides Federal agencies concrete strategies and leading practices to recruit, hire, include, develop, retain, engage, and motivate a diverse, results-oriented, high-performing workforce.
- Federal Equal Opportunity Recruitment Program Reports. OPM's annual reports may contain examples from Federal agencies about training activities that may be of interest to OIGs. As of March 1, 2022, the most recent report was from FY 2018. However, the available reports may still provide resource/contact information. Be sure to review your own OIG's, department's, or agency's report as well.



## Promotions and Professional Development

To grow a work environment in which DEIA principles are valued and implemented, the OIG community must incorporate DEIA into promotions and professional development strategies. At first glance, the civil service appears to be racially unbiased; however, a closer look at various statistics shows that people of color hold a significantly smaller percentage of senior-level positions than their percentage of the workforce. Diversity and inclusion increase an agency's capacity to serve and protect people who have different experiences or backgrounds and enhance its ability to be receptive to different traditions and ideas. Furthermore, OPM has noted that "Increased creativity is another byproduct of

### Alignment with Committee Strategic Goals

This section aligns with the following strategic goals from the DEIA Committee Charter:

 Identify and promote effective techniques for consolidating DEIA initiatives into promotion and professional development processes to facilitate advancement within the OIG Community workforce.

capitalizing on differences. Historically, some of the most creative periods in civilization have emerged when people of different backgrounds have contact and work together."

This roadmap section aims to position the OIG community as a Federal leader in promotions and professional development opportunities in an equitable, inclusive, and accessible environment for everyone, reflective of the diverse communities in which we work.

The routes and actions in this section help OIGs accomplish the following.

- Promote equity, fairness, inclusiveness, and accessibility in internal promotional and professional development practices that are accessible to all staff..
- Provide transparency and accountability for internal procedures and outcomes of promotions and professional development.
- Maintain processes to assess and address disparities in internal promotional and developmental opportunities.
- Comply with Merit Systems Principles when implementing DEIA strategies for promotions and professional development.



# Equity: Assess and address equity in the current state of employees' positions descriptions, promotions, and pay.

- 1. Conduct reviews periodically to evaluate job classifications and position descriptions to ensure parity across series and grade levels.
- Conduct annual reviews to examine, track, and compare how much employees are paid and who is being promoted, and take action to address disparities.
  - a. Commit organizational resources towards assessing, identifying, and addressing disparities in equity and fairness regarding promotions and pay for OIG staff.
  - b. Collect data on the demographics of OIG employees at all levels on the pay scale.
  - c. Analyze the data of all employees to determine whether disparities exist at supervisory levels.
  - d. Identify any delays in time-in-grade promotions of internal staff. Collect and analyze demographic data on affected staff. Determine causes of these delays and solutions to address and prevent future delays.

- e. Survey underrepresented staff at your respective OIG to determine possible causes of disparities. Document and report findings to staff agency wide.
- f. Incorporate appropriate actions and hold leadership accountable for disparities that remain unaddressed.
- g. Incorporate DEIA into the succession planning process and in policy related to promotions and professional development.
- h. Consult relevant human resources representatives on potential options to promote underrepresented internal staff.

- 1. Increase in internal awareness of promotions and pay disparities based on data derived from, but not limited to, internal surveys, demographic datasets, and policy reviews.
- 2. Documented and tracked assessment of the status of internal promotions based on demographic data points year over year.
- 3. Retention of talent and innovation from underrepresented groups.
- 4. Increase in specific activities taken to eliminate barriers and mitigate issues.



# Promotions: Clearly articulate steps to advancement for all types of positions within the agency.

- 1. Increase transparency among OIG staff, especially for underrepresented communities, on the skills and achievements necessary for promotional opportunities.
  - a. Determine how many job series exist within the agency.
  - b. Determine and share with staff the current paths to advancement in each selected series.
  - c. Provide and discuss with staff their current position descriptions and the position descriptions for the grade level above them (with approval from human resources).
  - d. Create internal promotion panels comprising underrepresented internal employees, external employees, or both. Share documented feedback with candidates who are not promoted.

- e. Communicate with all staff the paths to advancement that internal senior and executive leadership took, and the possibility of staff taking those or alternatives.
- f. Identify ways to minimize the outliers and promote transparency in advancement.

- 1. Increase in employee awareness on necessary steps for advancement.
- 2. Increase in transparency of promotional decisions made by management and senior leadership.
- 3. Increased trust that leadership bases promotions on fairness and considers DEIA.



# Professional Development: Provide direction and opportunities for all employees to partake in professional development activities.

- 1. Provide opportunities and encourage all staff (especially underrepresented staff) to have meaningful interactions and discussions with senior leaders.
- 2. Ensure that all staff (especially underrepresented staff) are provided growth opportunities.
  - a. Encourage internal executives and senior leaders to have one-on-one sessions and town halls (including question and answer mentoring sessions) with all staff (especially underrepresented staff).
  - b. Develop an interagency mentor program geared toward developing all staff (especially underrepresented staff).
  - c. Build a coaching program, or similar process, to allow staff an opportunity to learn and practice at the following:
    - Resume writing
    - Interviewing techniques
    - Making persuasive arguments
    - Public speaking
    - Networking skills

- d. Assist all staff (especially underrepresented staff) in securing executive-level, external mentors, including mentors from communities that are not underrepresented.
- 3. Develop processes to ensure equity of opportunity when assigning staff to work assignments and special projects and initiatives.
  - a. Develop a tool for tracking staffing decisions (including staff preferences for work assignments, if applicable).
  - b. Designate a management official to monitor staff assignments and participation on special projects to ensure equity of opportunities and project leadership opportunities.

- 1. Increase in communication between senior leaders, management, and all staff, especially underrepresented staff.
- 2. Increase in encouragement and opportunities for underrepresented staff to partake in professional development activities.
- 3. Continued equitable access to opportunities for promotions and professional development for all staff.
- 4. Increase in awareness of the developmental experiences of underrepresented staff.
- 5. Increased trust in leadership and management.
- 6. Improved diversity in historically underrepresented positions.
- 7. Increase in diversity of staff assigned to high-profile audits, key projects, and investigations.
- 8. Increase in participation of staff from underrepresented groups in leading and participating in OIG special projects and initiatives.
- 9. Increase in specific activities taken to eliminate barriers and mitigate issues.

### **How Do We Measure Progress?**

The following table provides metrics for measuring progress in the areas of promotions and professional development.

Table 3. Measuring Progress for Promotions and Professional Development

Level	Description
4—Optimized	Increased promotional transparency, equity in pay, and greater opportunities for all staff to participate in professional development activities, are key components of the agency's mission and guiding principles. The agency consistently assesses, tracks, demonstrates, documents, and communicates current leading practices in the advancement and development of its underrepresented staff.
3—Progressive	The OIG consistently implements policies and procedures to increase promotional transparency, combat pay disparity, and create greater opportunities for all staff (especially underrepresented staff) to partake in professional development activities. The OIG routinely assesses and communicates the effectiveness of these DEIA practices, and it uses the results of the assessments to inform improvements.
2—Defined	The OIG defines and documents practices to increase transparency and decrease disparities regarding pay, promotions, and professional development. The OIG creates and documents opportunities for all staff (especially underrepresented staff) to partake in professional development activities. However, this is primarily implemented to comply with relevant laws and mandates.
1—Ad Hoc	The OIG tracks, assesses, and documents disparities (or lack thereof) in pay and promotion, and it communicates its efforts to assess and address pay disparities to all staff. The OIG does not formally incorporate DEIA practices as they relate to promotions and professional development into its goals and policies.

### How Should We Report Results?

- 1. Collect baseline demographic data on all staff.
- 2. Collect baseline data on pay, promotions, and training transcripts of all staff.
- 3. Compare data compared to overall representation within the OIG's respective department or agency.

### What References and Resources Can Help?

- A recent <u>LeanIn report</u> found that Black women are "much less likely" than their non-Black colleagues to interact with senior leaders at work.
- Hispanic women are another minority group whose development is often overlooked. According to a <u>Catalyst report</u>, in addition to lacking access to mentors, role models, and sponsors.
- IMDiversity, "Breaking Through: The Making of Minority Executives in Corporate America"

- Harvard Business Review, "Research: Black Employees Are More Likely to Be Promoted When They Were Referred by Another Employee"
- Gartner, "3 Actions to More Effectively Advance Underrepresented Talent"
- Harvard Business Review, "<u>To Build a Diverse Company for the Long Term, Develop Junior Talent</u>"
- CNBC, "Why Black Workers Face Promotion and Wage Gaps that Cost the Economy Trillions"



## Performance, Recognition, and Awards

Once you identify your goals and strategies, it is essential to decide what performance expectations and standards you will use to engage your people at all levels in supporting DEIA, including executives, managers, supervisors, and staff. People discern the level of DEIA by what they see and how they are treated in the workplace, including who gets hired, who gets developed, who gets promoted and why, who leaves and why, and who gets recognition and awards. In building a DEIA strategy, it is important to pay attention to who gets recognition and awards and to ensure that everyone has an opportunity.

This section of the roadmap contains suggestions and resources to assist with ensuring DEIA is incorporated into performance, recognition, and awards processes for OIGs as well as the OIG community.

### Alignment with Committee Strategic Goals

This section aligns with the following strategic goals from the DEIA Committee Charter:

 Identify and promote effective techniques for integrating DEIA into performance and recognition processes to ensure a culture and belief by a majority of employees that they have an opportunity to be recognized and rewarded. The routes and actions in this section help OIGs accomplish the following.

- Incorporate DEIA elements in the criteria and the decision process for recognizing and rewarding employee performance.
- Develop a strategy to move your organization forward on the maturity model with measures that focus on recognizing, rewarding, and promoting diverse individuals.
- Implement systematic performance, recognition, and awards processes that incorporate DEIA and are established through goal setting, datadriven analysis, and continuous improvement.



Performance: Engage staff at all levels to support a workplace culture that incorporates diversity, equity, inclusion, and accessibility into performance measurement.

- 1. Set clear goals and expectations to ensure all employees performance requirements relating to DEIA are understood and agreed on.
- 2. Set clear goals and expectations to ensure all employees performance results are based on merit-based facts decisions, not opinions.
  - a. In coordination with the Chief Diversity Officer or designee, review performance results to assess equities in rating distribution throughout the OIG.
  - b. Implement a mechanism, such as 360-feedback, to obtain multiple feedback sources and assist with minimizing biased reviews.
- 3. Ensure inclusive language is used when providing performance-related feedback to employees (oral or written).
  - a. Develop guidance and other related tools to ensure inclusive language is used when providing feedback to employees (oral or written).
- 4. Conduct reviews of performance ratings to ensure consistency and equity of performance ratings throughout the OIG. These reviews can be completed by the Chief Diversity Officer or designee.
- 5. Conduct an internal engagement survey annually to elicit employee feedback on how well performance management is working in your office or component.

- a. Market the survey to ensure employees are clear on the purpose of the survey.
- b. Establish a process to address concerns related to DEIA and improve performance management.
- c. Conduct internal DEIA audits on promotional pay, hiring, and termination practices.
- d. Provide DEIA training on unconscious bias that highlights both the personal and systematic issues in relation to performance management.
- e. Increase employee engagement operations by using Employee Assistance Programs and dialogue sessions that include intentional relationship building, and encourage DEIA of thought and perspective.
- f. Share with employees survey results and any process improvements made in response to their feedback.

- 1. All employees' performance plans establish expectations, commitment, and accountability for advancing DEIA in their OIG.
- 2. Internal surveys reflect an increase in the percentage of employees who believe DEIA is supported by their OIG.
- 3. Decrease in the number of complaints overall related to DEIA.
- 4. Decrease in the number of Equal Employment Opportunity complaints, both informal and formal.
- 5. Increase in activities and actions taken by senior management to change the perception of employees—as measured by Federal Employee Viewpoint Survey and other surveys.



# Recognition: Develop processes that ensure equitable opportunities for recognition of all staff.

#### **How Can We Get There?**

1. Build an equitable, inclusive, and accessible work environment where employees are engaged, valued, and respected for their individual and cultural differences regardless of background.

- a. Identify and invite employee perceptions, in an openly receptive and psychologically safe manner, so that management can engage employees in expanding DEIA efforts.
- b. Participate in DEIA dialogues, surveys, training, and educational opportunities.
- 2. Reinforce inclusive behaviors by publicly recognizing employees and leaders who demonstrate a willingness to listen, be open-minded, and embrace differences.
  - a. Model behavior that accepts differences; builds trust; promotes open and honest communication; encourages staff to address issues among themselves; and seeks cooperative, positive resolutions.
  - b. Actively seek out employees who have not been considered for teams or other opportunities and encourage employees to participate.
  - c. Openly take action to learn about, understand, and communicate the business case for DEIA with employees and leaders.

- 1. Improved employee engagement and Federal Employee Viewpoint Survey scores.
- 2. Increase in opportunities for employee self-improvement through training, details, special projects, and promotions.



# Awards: Develop awards processes that ensure equitable consideration for staff awards, and include awards for efforts related to DEIA.

- 1. Ensure performance-based compensation or awards decisions are based on merit.
- 2. Provide equity in award opportunities for employees across all levels.
  - a. Use demographic data to establish a baseline of diversity for your rewards programs and update it annually.
  - b. Conduct a yearly internal survey to elicit employee input and feedback on ways to increase DEIA in rewarding staff.
  - Evaluate past awards data (including monetary, time off, and ad hoc awards) to gather trends and identify duplication in teams or

- individuals who are recognized or receive awards, as well as individuals and teams who may be overlooked.
- d. Seek suggestions from staff (via survey or other methods) on new awards categories.
- e. Establish a diverse awards selection panel consisting of staff from varying levels, specialties, demographics, and backgrounds.
- 3. Establish an internal award to recognize individuals or teams who have demonstrated excellence in employing DEIA strategies and program to accomplish high-quality, high-value work contributing to the OIG mission and strategic goals.
  - a. Develop criteria and policy to manage DEIA awards or program.
  - b. Assign a working group or committee and work with the Chief Diversity Officer or designee to ensure the award recipient process is fair, equitable, inclusive, and accessible.
- 4. Participate in CIGIE's award process to recognize individuals, teams, or OIGs that have demonstrated excellence in employing DEIA strategies and program to accomplish high-quality, high-value work contributing to the OIG mission and strategic goals.
  - a. Follow criteria and policy established by CIGIE to nominate individuals or teams.
  - b. Submit nominations through your OIG process for CIGIE consideration.

- 1. Survey results reflect an increase in employees who believe all employees have an equitable chance of being recognized and rewarded.
- 2. Depending on baseline data, increased or sustained diversity of employees being recognized and rewarded.
- 3. Increase in nominations for recognition and awards in DEIA category.

#### **How Do We Measure Progress?**

The following table provides metrics for measuring progress in the areas of promotions and professional development.

Table 4. Measuring Progress for Performance, Recognition, and Awards

Level	Description
4—Optimized	The OIG consistently demonstrates current leading practices in the advancement of DEIA in its performance, recognition, and awards policies and procedures. DEIA practices are key components of the OIG's mission and guiding principles.
3—Progressive	The OIG consistently implements policies and procedures to advance DEIA throughout the organization. The effectiveness of DEIA practices is routinely assessed, and results of the assessments inform improvements.
2—Defined	The OIG defines and documents practices relating to performance, recognition, and awards practices to advance DEIA that are primarily implemented to comply with relevant laws and mandates.
1—Ad Hoc	The OIG does not formally incorporate practices relating to performance, recognition, and awards practices as part of its goals and strategies relating to DEIA.

#### **How Should We Report Results?**

Human Resources, the Chief Diversity Officer, or a designee should track the results at an enterprise-wide level by collecting data tables of DEIA practices including reports from the Civilian Workforce and Equal Employment Opportunity information.

#### What References and Resources Can Help?

 OPM Policy, Data, Oversight. Provides Federal agencies with focus areas—engaged employees, continuous learning, performance management, diversity and inclusion, labor and management relations, and work life—and strategic, operational, and employee metrics to measure results of an organization's performance culture.



## Our Business

Our work should be representative of and accessible to the diverse public we serve.

OIGs promote efficiency, effectiveness, and integrity in Federal programs and operations through work to detect and prevent fraud, waste, and abuse. Aligning our purchases, contracts, audits, investigations, outreach, and other work with our DEIA initiatives will help ensure our relationships with our business suppliers, stakeholders, and partners represent the values we uphold in the OIG community.



# **Business Supplier Diversity**

The Federal government is the largest purchaser of goods and services in the world. It acquires over \$650 billion per year in goods and services. Increasing diversity among Federal business suppliers enables a broader cross section of businesses to share in these opportunities and the resulting jobs. Economic research shows that investing in underserved communities and closing racial wealth gaps yields economic growth and job creation that benefits all Americans.

Recent executive branch initiatives have identified the benefits of a diverse supplier base; these initiatives have specified enhanced goals for contracting to small, disadvantaged businesses and ordered agencies to engage in specific management actions to improve equity in procurement and to enhance the supplier base.<sup>1</sup>

#### Alignment with Committee Strategic Goals

This section aligns with the following strategic goals from the DEIA Committee Charter:

 Identify and promote effective techniques for incorporating DEIA initiatives into procurement and acquisition strategies to obtain goods and services from underrepresented businesses.

<sup>&</sup>lt;sup>1</sup> White House Fact Sheet, "New Actions to Build Black Wealth and Narrow the Racial Wealth Gap" (increases the share of Federal contracts to small, disadvantaged businesses to 15 percent in FY 2026 (from current goal of 5 percent); OMB-M-22-03 (Dec. 2, 2021), Q1, page 2.

Improving business diversity in the varied OIG community will require increased awareness and focus among senior leaders and contracting officials regarding the importance of improving supplier diversity. OIGs will also have to adopt specific, scalable policies and practices to better access diverse businesses in planned procurements. By directing more procurement and contracting dollars to underserved individuals and communities, a broader representation of businesses can share in the jobs and opportunities created by Federal buying activities.

The routes and actions in this section help OIGs accomplish the following.

- Demonstrate leadership commitment to improving supplier diversity.
- Incentivize OIG contracting officials to improve supplier diversity.
- Provide contracting officials with collaboration tools across the Federal OIG and contracting community around supplier diversity.
- Embed supplier diversity in OIG acquisition planning and procurement processes.
- Leverage CIGIE to coordinate efforts or conduct events around improving supplier diversity.



## Snapshot: Small Businesses and the Federal Government

- The number of new small business entrants, including small-disadvantaged businesses, to Federal procurement decreased by 79 percent from 2005 to 2019.
- The Federal supplier base includes 49,000 fewer small businesses in 2020 than in 2010.
- The Office of Management and Budget found that Federal government outreach to diverse vendors is inadequate and there is a lack of visibility to available opportunities.
- The Small Business Administration's 2020 Federal government procurement scorecard noted that the Federal government consistently struggles in meeting contracting goals regarding women-owned small businesses and HUBzone certified small businesses (small businesses in historically underutilized business zones).

Sources: OMB Memo M-22-03; Bipartisan Policy Center report, "Supporting Small Business and Strengthening the Economy Through Procurement Reform," June 2021; OMB Study to Identify Methods to Assess Equity, July 2021; White House issue paper "The Benefits of Increased Equity in Federal Contracting," December 2021.



# Commitment: Increase awareness of and commitment to business supplier diversity among OIG leaders and OIG contracting officials.

- 1. Improve OIG senior leaders' commitment to increasing supplier diversity.
  - a. Ensure OIG senior leaders meet at least annually with their respective department's Office of Small and Disadvantaged Business Utilization (OSDBU) regarding business supplier diversity progress and recommendations for improvement.
  - b. Include performance elements relating to attending outreach activities or achieving business supplier diversity goals in relevant Senior Executive Service employees' annual performance plans.
  - c. Set bold goals of using small, disadvantaged businesses (above the minimum goal of 5 percent), especially for FYs 2022–2025, per the White House's small, disadvantaged businesses goal of 15 percent.
  - d. Include public facing metric regarding supplier diversity (for example, small, disadvantaged businesses goals or percentage improvement in OIG dollars spent on small businesses) in OIG strategic plan or DEIA plans regarding supplier diversity.
  - e. Attend CIGIE Industry Day events regarding vendors who offer common OIG requirements.
  - f. Implement specific business supplier diversity procurement goals and measure those goals against annual Small Business Administration published scorecards.
- 2. Improve OIG contracting officials' (program managers, contracting officers, contracting specialists, contracting officer's representatives) awareness of business supplier diversity tools and resources.
  - a. Ensure OIG contracting officials are connected with their department's or agency's OSDBUs and participate in OSDBU outreach events and activities, as appropriate; consider including attendance at diverse supplier outreach events in such employees' performance plans.
  - b. Ensure OIG contracting officials meet at least annually with their designated Small Business Administration procurement center representative.

- c. Ensure the OIG engages with OSDBUs and procurement center representatives early on their most significant or recurring procurements (that is, at least by the time the acquisition plan is being drafted).
- d. Ensure OIG contracting officials are subscribed to the <u>DEIA</u> <u>collaboration site</u> and Business Diversity Group page and have access to other OIG contracting officials' contact information to facilitate sharing leading practices, lessons learned, and source selection or market research.

- 1. Increase in awareness of and commitment to business supplier diversity among OIG leaders and OIG contracting officials.
- 2. Increase in key senior OIG officials' and contracting officials' awareness of and outreach to small, disadvantaged businesses and diverse suppliers.



#### Access: Increase OIG access to diverse suppliers.

- 1. Use resources and procurement processes that are inclusive of diverse suppliers.
  - a. Draft and implement OIG specific policy that includes processes to target diverse suppliers in OIG procurements. These steps can include specific market research steps, consulting with the OSDBU and Small Business Administration procurement center representative on significant procurements, and considering using various diverse small business contract vehicles.
  - b. With assistance from OSDBU, Small Business Administration procurement center representatives, or the General Services Administration, prepare and publicize a forecast of OIG acquisition requirements for future years to diverse businesses. One possible tool is the General Services Administration Forecast of Contracting Opportunities tool.
  - c. Ensure procurement awards comply with Section 508 requirements.
- 2. Consider using existing prenegotiated diverse supplier contracts and blanket purchase agreements.
  - a. Continuously review the National Aeronautics and Space Administration Solutions for Enterprise-Wide Procurement, the General

Services Administration One Acquisition Solution for Integrated Services professional service vehicle, existing CIGIE Blanket Purchase Agreements, and other preawarded diverse supplier vehicles when considering fulfilling OIG requirements.

b. Conduct research by posting messages to other OIG contracting officers on the CIGIE <u>DEIA collaboration site</u> regarding potential diverse supplier sources for the specific requirement.

#### What Should We See?

- 1. Increase in shared expertise regarding diverse supplier sources; use of a suite of diverse supplier contacts.
- 2. Increase in individual OIGs' annual contract spending to small, disadvantaged businesses and diverse supplier categories.



# Expertise: Leverage relevant expertise from CIGIE, other Federal OIGs, and other Federal agencies to increase business diversity.

- 1. Leverage CIGIE events and resources to improve business diversity.
  - a. Subscribe to and participate in CIGIE's DEIA collaboration space for OIG contracting officers.
  - b. Participate in CIGIE DEIA Committee Business Diversity Team focus groups and related events.
  - c. Distribute and use listing of OIG contracting officers in Federal OIGs.
  - d. Conduct or attend CIGIE industry days, market research events, or outreach events including any regarding DEIA services or small business suppliers.
- 2. Leverage Federal government initiatives and tools to improve business diversity including the 8(a) Pool Initiative established by SBA in partnership with GSA.<sup>2</sup>

<sup>&</sup>lt;sup>2</sup> GSA and SBA are partnering in this initiative to provide a mechanism for directed awards to designated Multiple Award Schedule contractors who are small disadvantaged businesses. Ordering procedures and other details are expected to be established and published in September 2023. GSA's contact on the effort is Steven Hutchinson (Steven.Hutchinson@gsa.gov).

- 1. Increase in collaboration efforts among the OIG community in supporting and procuring services from diverse business suppliers.
- 2. Increase in the number and capability of diverse small businesses that provide goods and services to the Federal OIG community.
- 3. Procurement vehicles that comply with Section 508 requirements.

#### **How Do We Measure Progress?**

The following table provides metrics for measuring progress in the areas of business supplier diversity.

Table 5. Measuring Progress for Business Supplier Diversity

Level	Description
4—Optimized	The OIG consistently demonstrates current leading practices in improving business diversity within its procurement system. Such practices achieve actual improvements in small business diversity among OIG suppliers past mandated goals.
3—Progressive	The OIG consistently implements policies and practices that consider and incorporate business supplier diversity in the organization's procurements. The OIG routinely assesses these policies and practices, and the results of the assessments inform improvements.
2—Defined	Existing OIG policies and practices that consider and incorporate supplier diversity are primarily implemented to comply with relevant laws and mandates.
1—Ad Hoc	The OIG's goals and strategies (as reflected primarily in acquisition or procurement policies and annual spend plan) do not reflect provisions relating to business supplier diversity. Diversity may be considered in specific procurements on an ad hoc basis.

#### How Should We Report Results?

Individual OIGs can use the following existing reporting mechanisms (or develop them anew) to reflect implementation and enhance accountability for improving business supplier diversity.

- Report on achievement of small, disadvantaged business contract spending goals and other categories in annual performance or strategic plan.
- Report annually on achievement of goals and implementation of practices and processes (issuance of annual procurement forecasts, attendance or hosting of outreach events, implementation of procurement policies or practices) in annual DEIA plan report or activities.

• Report annually on achievement of contract spending goals to department or agency OSDBU.

#### What References and Resources Can Help?

- 15 U.S.C. § 644(q)
- <u>48 C.F.R. Part 19</u> (Federal Acquisition Regulation provisions regarding reserves and set asides)
- Methods and Leading Practices for Advancing Equity and Support for Underserved Communities Through Government, <u>85 Fed. Reg. 24,209</u> (May 5, 2021) (Request for Information)
- Executive Order 13985, "Advancing Racial Equity and Support for Underserved Communities" (Jan. 20, 2021)
- White House Fact Sheet, "New Actions to Build Black Wealth and Narrow the Racial Wealth Gap" (June 1, 2021) (increase in small, disadvantaged business goals)
- OMB M-22-03 "Advancing Equity in Federal Procurement" (Dec. 2, 2021) (directs five management actions)
- SBA FY 2022 Procurement Scorecard

#### **Relevant Federal Government Contacts**

- Small Business Administration <u>Procurement Center Representatives</u> <u>Directory</u>
- Office of Management and Budget, Office of Federal Procurement Policy (contact at MBX.OMB.OFPPv2@OMB.eop.gov)
- GSA <u>Small and Disadvantaged Business Utilization</u>
- OIG contracting officials collaboration website

#### Links and Resources for Small Business Research

- Small Business (Disadvantaged Business) Webpage
- Small Business Dynamic Search
- NASA Solutions for Enterprise-Wide Procurement contract suite
- VA OSDU Database
- GSA Forecast Tool

#### **CIGIE Resources**

• Shared Services Report and Work Group. Contact William Hoyt, Smithsonian OIG (<a href="whoyt@oig.si.edu">whoyt@oig.si.edu</a>) or Jarvis Rodgers, Health and Human Services OIG (<a href="Jarvis.l.rodgers@oig.hhs.gov">Jarvis.l.rodgers@oig.hhs.gov</a>)

• CIGIE Data Analytics Services Blanket Purchase Agreements. Contact Sara Dendas, Contracting Officer's Representative, <a href="mailto:Sara.Dendas@cigie.gov">Sara.Dendas@cigie.gov</a>, (202) 924-1299; or Timothy Gerhart, Contracting Officer, <a href="mailto:Timothy.gerhart@ibc.doi.gov">Timothy.gerhart@ibc.doi.gov</a>, (703) 964-8824.



### Stakeholders and Partners

The work of OIGs is inherently connected to external stakeholders and their DEIA efforts. In conducting reviews of federally funded entities and programs, OIGs should do so through a lens of DEIA, which would include an assessment of the equitable administration of the program.

External stakeholders of OIGs are individuals or groups who do not work inside the OIG but are affected in some way by the decisions and actions of the OIG. For example, external stakeholders include U.S. citizens and taxpayers; recipients of government programs and funding; Congress; the OIG's department or agency; and other Federal, State, and local agencies. Some stakeholders may share interests, such as operational efficiency and being good stewards of government funds, while others may have diverging interests.

In a 2021 <u>update</u> to the Generally Accepted Government Auditing Standards (GAGAS, or the Yellow Book), the Government Accountability Office added equity as a key program principle for government

#### Alignment with Committee Strategic Goals

This section aligns with the following strategic goals from the DEIA Committee Charter:

 Collaborate with stakeholders and partners to promote a culture of DEIA within the organizations that we oversee, and highlight issues related to these matters in the workplace. programs and assessment the performance of those programs. The standard states, "The administration of a government program or activity is equitable when it consistently serves members of the public, distributes public services, and implements public policy in a manner that promotes fairness, justice, and equality." Assessing equitable programs could include the following:

- equality of access to and provision of services;
- procedural fairness and equal treatment of individuals in government programs and policies;
- causes of disparate outcomes; or
- distributional impacts of public policies, programs, resources, and services.

The principles outlined in the Yellow Book guidance can also be applied to work conducted under the CIGIE's Quality Standards for Inspections and Evaluations (the Blue Book) and Quality Standards for Federal Offices of Inspector General (the Silver Book).

The routes and actions in this section help OIGs accomplish the following.

- Identify and promote successful techniques for integrating DEIA in OIG reviews of federally funded entities and programs.
- Encourage improvements in the equitable management of federally funded entities and programs.



# Oversight: Promote equitable access and administration of Federal agencies and programs that assist the American people.

- 1. Promote equitable and accessible Federal programs through oversight of those programs.
  - a. Include the Government Accountability Office's definition of equitable in all reviews of federally funded programs.
  - b. Include elements of DEIA in all audits, evaluations, and reviews as appropriate.
  - c. DEIA Committee, in coordination with CIGIE Audit and Inspection and Evaluation Committees, has developed the <u>Toolkit for Considering</u> <u>Equity When Conducting Oversight Work</u> to use during field work of audits, evaluations, and inspections.

- d. DEIA Committee will coordinate with CIGIE Investigations Committee to highlight fraud, waste, and abuse in oversight programs related to DEIA.
- e. Report opportunities to improve equitable program administration.
- f. Add at least one assessment of an aspect of DEIA into the annual audit plan.
- g. Add a project proposal or plan step that includes a determination on whether the objectives or the data include a DEIA element.
- h. Tag all appropriate reports on oversight. gov with the "DEIA" tag to help demonstrate how DEIA is being addressed in federally funded programs across government agencies. (See a list of DEIA-related reports in Compendium of OIG Reports related to DEIA, Volume 1: FYs 2014–2021.)



- i. Add a DEIA-related Top Management Challenge, based on the Executive Order 13985, or incorporate DEIA elements into existing challenges related to human capital.
- j. Share the results OIG's work on how well departments and agencies are assisting external stakeholders from a DEIA perspective and any identified roadblocks for more positive impact in this area.
- k. Discuss among the OIG community topic areas that may be causing disparate outcomes that can be addressed across government agencies.

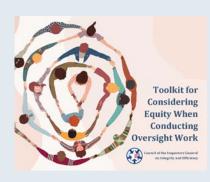
- 1. Increase in equitable access to program activities and services.
- 2. Identification of disparate outcomes and the resulting recommendations to correct disparity.
- 3. Identification of program weakness related to equitable distribution or implementation of government programs.
- 4. Identification of data gaps to assessing equity in program implementation and agency staffing.
- 5. A source of leading practices on how to assess and report on DEIA activities impacting stakeholders.
- 6. Improvement in techniques to evaluate and review ongoing activities to establish new and enhanced ways to think about the issues.



## For Your Toolbox: Equity Toolkit for Oversight Work

The DEIA Committee Stakeholder Oversight Working Group, composed of representatives from across the OIG community, created the Toolkit for Considering Equity When Conducting Oversight Work. This toolkit is intended to assist OIGs with considering equity in oversight work, including audits, investigations, evaluations, reviews, and other projects. The toolkit provides general considerations, resources and tools, and examples of including equity in oversight work in the following areas: general equity principles, program and policy oversight, data impacts on equity in oversight work, reporting and disseminating information, human capital, contracting and procurement, education, financial, information and communication technology, intelligence, and health equity policy.

In each area, the toolkit identifies relevant considerations for oversight professionals, resources and tools that can be employed to address those considerations, and examples of oversight work employing those methodologies, all to provide a baseline to inform discussions with stakeholders when planning oversight work and help guide future work in these areas.





Project Teams: Assign teams to oversight projects that are consistent with diverse, equitable, inclusive, and accessible workplace practices.

#### How Can We Get There?

 Consistent with actions described in Routes 4 through 9, assign diverse staff to projects based on the type of program to be assessed or project to be completed.

- a. During decision making processes for planning and initiating projects, evaluate staff assignments to assist with assigning well-rounded, skilled, and diverse teams.
- b. Ensure all staff members have equitable access to opportunities when decisions are being made regarding project assignments.
- c. Track project assignments for staff, share feedback with staff who are not selected for projects, and note disparities to make continuous improvements.

### 2. Establish an internal tracking system on all project selection and priority by staff.

 Generate and disseminate quarterly dashboard reports showing what staff members were selected to ensure transparency and fairness of project opportunities.

#### What Should We See?

- 1. Increased awareness of value-added products that provide program results that include aspects of DEIA as designed.
- 2. Increased awareness of the developmental experiences of underrepresented staff.
- 3. Increased trust in leadership and management.

#### **How Do We Measure Progress?**

The following table provides metrics for measuring progress in the area of stakeholders and partners.

Table 6. Measuring Progress for Stakeholders and Partners

Level	Description
4—Optimized	The OIG consistently demonstrates current DEIA leading practices in its oversight of federally funded entities and programs. The OIG's strategic plan and mission reflect a commitment to evaluating DEIA practices.
3—Progressive	The OIG consistently conducts reviews that evaluate the equitable management of federally funded entities and programs. The effectiveness of DEIA practices is routinely assessed, and the results of the assessments inform improvements.
2—Defined	OIG practices to address DEIA efforts of external stakeholders and partners are primarily implemented to comply with relevant laws and mandates.
1—Ad Hoc	External reviews with a DEIA emphasis have not been formally incorporated as part of the OIG's goals and strategies.

#### What References and Resources Can Help?

- <u>U.S. Department of Veterans Affairs Diversity and Inclusion Strategic</u> Plan
- Education OIG Diversity, Equity, Inclusion, and Accessibility Strategic Plan for Fiscal Years 2023–2028
- Education OIG Diversity, Equity, Inclusion, and Accessibility FY 2022

  Annual Progress Report
- Education OIG Diversity, Equity, Inclusion, and Accessibility FY 2021
  Annual Progress Report
- Education OIG Diversity, Equity, and Inclusion Initiative FY 2020 Annual Progress Report



## Our Workplaces

Our workplaces should be environments in which employees can be authentic and thrive.

Our workplaces should be accessible, inclusive, and harassment-free environments where staff members feel safe to be their authentic selves while contributing to the mission of their office.



### Safe and Harassment-Free Workplaces

Safe workplaces are a government-wide DEIA priority and included as part of the <u>Government-wide Strategic Plan to Advance Diversity</u>, <u>Equity</u>, <u>Inclusion</u>, <u>and Accessibility in the Federal Workforce</u>.

The plan encourages leaders to promote training, education, prevention programs, and monitoring to create a culture that prevents and addresses workplace harassment. In addition, the Federal government as an employer has a strong interest in addressing domestic violence, sexual assault, and stalking (DVSAS). DVSAS costs workplaces over \$5.8 billion a year through degraded productivity, lost earnings, and healthcare costs according to a 2003 Centers for Disease Control and Prevention report. More recent statistics show that DVSAS costs have increased

### Alignment with Committee Strategic Goals

This section aligns with the following strategic goals from the DEIA Committee Charter:

- Identify and promote successful techniques for integrating DEIA initiatives into human capital strategies to attract, recruit, and sustain talent.
- Increase collaboration among the OIG community to identify training and awareness resources that promote DEIA.
- Promote effective training and awareness resources to enhance DEIA across the OIG community.

to \$8.3 billion. As such, agency leaders should provide support and resources to employees who may be experiencing DVSAS as part of their safe workplace initiatives.

Safe, accessible, inclusive, and harassment-free workplaces require agencies to not only commit to these workplace attributes, but to make it a priority through goal setting and tangible action. To that end, OPM recently released a framework to assist Federal agencies in developing and prioritizing goals related to anti-harassment and support for those experiencing DVSAS.

To further advance OIG-wide DEIA efforts, the DEIA Committee partnered with the Council of Counsels to the Inspectors General and several chief diversity officers within the OIG community to develop steps that can be taken to assist OIGs with creating and fostering safe and harassment-free workplaces and provide support for those employees who may be experiencing DVSAS.

The routes and actions in this section help OIGs accomplish the following.

- Annually develop and distribute an Anti-Harassment Policy.
- Establish a tracking system for the Safe and Harassment Free program and analyze the data as an accountability measure.
- Develop tools and benchmark existing surveys and reports to assess safe and inclusive workplaces and address workplace harassment.
- Ensure a safe workplace to deter violent, disruptive, aggressive, or abusive behavior, and report any such conduct in accordance with policy.
- Develop a continuous learning approach to workplace safety and harassment to equip managers and supervisors with the skills and knowledge to support employees effectively.



Self-Assessment: Assess human resources practices, operations, and workforce composition to support safe and harassment-free workplaces and employees experiencing DVSAS.

#### **How Can We Get There?**

- 1. Assess your workplace for the risk factors associated with harassment and explore ideas for minimizing those risks.
  - a. Use the EEOC Checklists to assess the risk factors present and to create a holistic prevention effort:
    - Checklist One: <u>Leadership and Accountability</u> to establish a culture of respect in which harassment is not tolerated.
    - Checklist Two: <u>Anti-Harassment Policy</u> a key component of a holistic prevention effort.
    - Checklist Three: <u>Harassment Reporting System and Investigations</u> allow employees to file a report of harassment and establishes a process for investigations.
    - Checklist Four: <u>Compliance Training</u> to inform employees of the organization's policy, reporting systems, and investigations.
  - b. Use the <u>Chart of Risk Factors and Responsive Strategies</u> to identify strategies for reducing harassment in response to risk factors.
- 2. Annually review your organization's complaint processes to ensure it provides a prompt, thorough, and impartial investigation into alleged harassment that includes, domestic violence, sexual assault, and stalking.
- 3. Based on results from step 2, update policies and procedures as needed or coordinate with your parent organization to share comments if you do not have internal OIG policies.
- 4. Conduct climate surveys on an as-needed basis to assess the extent to which harassment is experienced as a problem in the workplace.
- 5. Assess human resources practices, operations, and policies to identify opportunities to ensure safe, harassment-free workplaces.

#### What Should We See?

- 1. A harassment prevention policy that is easy to understand and communicated to all employees.
- 2. A fully-resourced reporting process that allows the organization to respond promptly and thoroughly to reports of harassment that have been experienced or observed.
- 3. A supportive working environment where workplace civility training and bystander intervention training are conducted and individuals feel safe to report harassing behavior to management.
- 4. Employees who are aware and informed about their rights and responsibilities if they experience conduct that is not acceptable in the workplace.

5. Easy-to-understand and realistic methods for dealing with harassment that they observe that is reported to them or of which they have knowledge or information, including a description of sanctions for failing to use such methods.



Policy Review: Evaluate the strength of current safety and anti-harassment policies and procedures and consider opportunities for changes to provide support to those experiencing DVSAS.

- 1. Establish effective policies and procedures to support Federal employees and/or their family members who have experienced domestic violence, sexual assault, or stalking (DVSAS).
- 2. Use OPM's <u>Guidance for Agency-Specific Domestic Violence, Sexual Assault, and Stalking Policies</u> as a tool to:
  - a. Identify, modify, or develop policies and procedures that address the effects of domestic violence, sexual assault, or stalking (DVSAS) on its workforce and that are consistent with agency guidance and applicable laws.
  - b. Increase transparency and awareness necessary to develop policies that align with DVSAS approaches and principles. For instance:
    - Form a planning group to evaluate your agency's current ability to respond to DVSAS incidents.
    - Develop a plan to develop specific policies to address DVSAS, incorporating current capacity, skills gaps, a reporting procedure, and incident response plans.
    - Provide recommendations to strengthen your agency's response capability.
- 3. Awareness of transparency of policies and procedures incorporate workplace flexibilities (such as, various types of leave, flexible work schedules, and the Family and Medical Leave Act for employees and/or their family members who or victims of DVSAS.

- 1. Increased awareness of agency capacity to currently handle incidents related to domestic violence, sexual assault, and stalking in the workforce. An effective way to begin is by assessing previous incidents that occurred and evaluating the responses to them.
- 2. Increased awareness of reporting procedures that provide an effective, confidential, and accessible way for employees to report incidents and concerns. Ensuring reporting procedures are addressed efficiently and that agency staff is trained and prepared to handle such reports.
- 3. Increase in effective communication with persons with disabilities (e.g., hearing or speech impairments) by providing appropriate auxiliary aids during training, outreach, and awareness activities, reporting procedures, administration of safety precautions, and an employee's usage of assistance services.



Priority Development. Develop priorities related to the five core anti-harassment principles, and support for employees experiencing DVSAS.

- 1. Follow the U.S. Equal Employment Opportunity Commission's (EEOC's) "five" core principles for generally preventing and addressing harassment:
  - a. Committed and engaged leadership
  - b. Consistent and demonstrated accountability
  - c. Strong and comprehensive anti-harassment policies
  - d. Trusted and accessible complaint procedures; and
  - e. Regular, interactive training tailored to the audience and the organization
- 2. Allocate sufficient resources towards building a harassment free workplace that includes, staffing, training, and a reporting system.
- 3. Establish and disseminate an Anti-Harassment policy and procedures for reporting harassment.

- 4. Conduct mandatory anti-harassment training biannually to ensure everyone is aware of the policy, reporting procedures, and the consequences of violating the Agency's Anti-Harassment Policy.
- 5. Hold managers and supervisors accountable for preventing and responding to workplace harassment and DVSAS incidents, including:
  - a. Established performance metrics, and
  - b. Language included in performance plans.
- 6. Establish harassment and DVSAS incident reporting systems that are well-known and easily understood by employees. The complaint reporting systems should include the following.
  - a. Evidence of measures to prevent further alleged harassment and harm from continuing or escalating during an inquiry into allegations of harassment.
  - b. Evidence of an investigation into alleged harassment, including the name of the official, relevant facts, and corrective actions taken.
    - The investigating official (can be a contractor) should be a neutral party and should receive appropriate technical support from Human Resources, the Office of Civil Rights, or related offices.
    - Where harassment is found to have occurred, management should take immediate and appropriate corrective action, including prompt discipline that is proportionate to the severity of the infraction.
- 7. Ensure discipline is consistent and does not give (or create the appearance of) undue favor to any employee.
- 8. Provide training to employees regarding the organization's DVSAS policies, reporting systems, investigations, and DVSAS incident response plans.
- 9. If the OIG has investigators with law enforcement authority, including the authority to carry firearms, establish policies and procedures prohibiting those law enforcement officers from access to firearms if they have been convicted of a misdemeanor crime of domestic violence. (See 18 U.S.C. §§ 922, 925(a); Act of September 30, 1996, Pub. L. No. 104 208, § 658(b), 110 Stat. 3009.)

- 1. Dedicated staff and harassment and DVSAS incident reporting systems that are easily accessible and user friendly for all employees.
- 2. Comprehensive complaint reporting systems that assist with readily monitoring activities and provides evidence of:

- a. Measures to aid in preventing further alleged harassment and harm from continuing or escalating during an inquiry into allegations of harassment.
- b. An investigation into alleged harassment, including the name of the official, relevant facts, and corrective actions taken.
- c. Increased awareness of staff through harassment and DVSAS training and related requirements.



# Periodic Assessment. Assess progress and adjust priorities as appropriate.

#### How Can We Get There?

- Annually collect data related to harassment and DVSAS support to develop a snapshot of activities over the year and compare the data with prior years' activities. Assess data over a minimum of three to five years in order to better assess trends.
- 2. Track the number of employees and managers receiving training or educational information on DVSAS including sexual harassment.
- 3. Track the number of employees requesting information, referrals, or time off for needs relating to DVSAS.
- 4. Track the number of orders of protection or restraining orders (in aggregate form) given to management by employees or taken out by the employer in consultation with employee.
- 5. Track the number and/or percentage of employees requesting help for DVSAS through employee assistance services.

#### What Should We See?

- 1. Improved awareness among employees about policies, resources, and support systems relating to DVSAS.
- 2. Heightened awareness and usage of services that indicate agencies are meeting the needs of their employees.
- 3. Improve awareness of cultural competence training for Federal employees addressing DVSAS in diverse workplaces.
- 4. Increased knowledge of the unique DVSAS issues and higher statistics for individuals with disabilities, especially those with intellectual and developmental disabilities.

#### **How Do We Measure Progress?**

The following table provides metrics for measuring progress in attaining safe and harassment-free workplaces.

Table 7. Measuring Progress for Safe and Harassment-Free Workplaces

Level	Description
4—Optimized	The OIG consistently demonstrates current leading practices in promoting, establishing, and advancing safe and harassment-free workplaces, including support for those experiencing DVSAS. Safe and harassment-free workplaces are key components of the OIG's mission and guiding principles.
3—Progressive	The OIG consistently implements policies and procedures relating to safe and harassment-free workplaces, including support for those experiencing DVSAS. The effectiveness of the policies and procedures are routinely assessed, and the results of the assessments inform improvements.
2—Defined	Existing OIG policies and practices relating to safe and harassment-free workplaces, including support for those experiencing DVSAS, are primarily implemented to comply with relevant laws and mandates.
1—Ad Hoc	The OIG does not formally incorporate practices relating to anti-harassment and DVSAS programs as part of its goals and strategies relating to DEIA.

#### What References and Resources Can Help?

#### **Legal Authorities**

- Executive Order 14035, "<u>Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce</u>," June 25, 2021, Sections 3(b)(iii) and 9.
- Government-Wide Strategic Plan to Advance Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce (Nov. 2021), Section 6.

#### **Federal Resources**

- OPM, <u>Guidance for Agency-Specific Domestic Violence</u>, <u>Sexual Assault</u>, <u>and Stalking Policies</u> (Feb. 2013).
- EEOC, <u>Model EEO Programs Must Have An Effective Anti-Harassment Program</u>
- EEOC, Report of the Co-Chairs of the Select Task Force on the Study of Harassment in the Workplace (June 2016). Appendix B contains a checklist for employers, with recommended steps to create a holistic harassment prevention program.

- EEOC, <u>Management Directive 715: EEO Reporting Requirements for Federal Agencies</u>, Section II.A., C.
- EEOC, "Promising Practices for Preventing Harassment," OLC Control No. EEOC-NVTA-2017-2 (Nov. 21, 2017). This document addresses promising practices to assist employers in preventing and addressing harassment, based on the 2016 Report of the Co-Chairs of EEOC's Select Task Force on the Study of Harassment in the Workplace.
- U.S. Department of Agriculture OIG, "Assessment of the State of Oversight Work in the Area of Sexual Harassment and Misconduct in the Federal Government" (July 2019). Report contains a list of best practices, standards, and guidance for agencies to consider when addressing sexual harassment. It also contains a list of source documents that were reviewed as part of the assessment.
- Employer Checklists and Chart of Harassment Risk Factors and Responsive Strategies
- OPM webinars on Executive Order 13985, Learning Community OMB MAX Page

#### **Terminology**

The following definitions are from OPM's <u>Guidance for Agency-Specific</u> <u>Domestic Violence, Sexual Assault, and Stalking Policies</u>.

- **Bullying.** Bullying is unwanted aggressive behavior towards a person or persons that hurts or harms them physically or emotionally, where there is a real or perceived power imbalance, and the behavior is repeated or is highly likely to be repeated. It involves, among other things, threats, hate messages, intimidation, or otherwise inappropriate language intended to humiliate or demean an individual or group of individuals.
- **Cultural Competence.** Cultural competence is a set of congruent behaviors, attitudes, and policies that come together in a system, agency, or among professionals that enable effective work in cross-cultural situations.
- Domestic Violence. Domestic violence is a pattern of coercive behavior, including acts or threatened acts, that are used by a perpetrator to gain power and control over a current or former spouse, family member, current or former intimate partner, current or former dating partner, or person with whom the perpetrator shares a child in common. This behavior includes, but is not limited to, physical or sexual violence, emotional and/or psychological intimidation, verbal abuse, stalking, economic control, harassment, threats, physical intimidation, or injury.
- Harassment. Harassment is a form of employment discrimination that violates Title VII of the Civil Rights Act of 1964, the Age Discrimination in Employment Act of 1967, and the Americans with Disabilities Act

of 1990. Harassment is unwelcome conduct that is based on race, color, religion, sex (including sexual orientation, gender identity, or pregnancy), national origin, older age (beginning at age 40), disability, or genetic information (including family medical history).

- Perpetrator. A perpetrator is an individual who commits or threatens to commit an act of domestic violence, sexual assault, and/or stalking.
- **Protection or Restraining Order.** Victims may obtain a protection order, sometimes called a restraining order, a stay-away order, or a peace order, from a court to protect them from a perpetrator.
- Sexual Assault. Sexual assault refers to a range of behaviors, including but not limited to, a completed nonconsensual sex act (e.g., rape, sodomy, child molestation), an attempted nonconsensual sex act, and/or abusive sexual contact. Sexual assault includes any sexual act or behavior that is perpetrated when someone does not or cannot consent.
- Sexual Harassment. Title VII of the Civil Rights Act of 1964 refers to
  unwelcome sexual advances, requests for sexual favors, and other verbal
  or physical conduct of a sexual nature when this conduct explicitly or
  implicitly affects an individual's employment, unreasonably interferes
  with an individual's work performance, or creates an intimidating, hostile,
  or offensive work environment.
- Stalking. Stalking refers to harassing, unwanted, or threatening conduct that causes the victim to fear for their safety or the safety of a family member. Stalking may occur through use of technology, including but not limited to, email, telephone, voicemail, text messaging, and use of GPS and social networking sites.
- Victim. A victim is an individual who is currently subject to, or has in the past been subjected to, domestic violence, sexual assault, and/or stalking.
- Trauma-Informed Care. Trauma-informed care is an approach to engaging people with histories of trauma that recognizes the presence of trauma symptoms and acknowledges the role that trauma has played in their lives.
- Workplace. A workplace is an employee's official duty station or alternative work location that is associated with the employee's established tour of duty (working hours). The employee is considered to be in the workplace while in or utilizing the resources of the employer, including while working remotely.
- Workplace-Related Incidents. Workplace-related incidents of DVSAS
  include acts, attempted acts, or threatened acts by or against employees,
  and/or against employees' families or property, that occur in the
  workplace or that occur outside the workplace but have an impact on the
  workplace.

 Workplace Safety Plan. A workplace safety plan is a strategy developed in collaboration with a victim to implement workplace safety options, to include but not limited to, the handling of court protection orders, procedures for alerting security personnel, temporary or permanent adjustments to work schedules and locations, changes in parking spots, and requests for escorts to and from workplace facilities.



## **Our Access**

Accessibility promotes a diverse workforce that brings diverse skills and perspectives.

An accessible workplace benefits all members of society by including individuals with disabilities. Improving accessibility and providing reasonable accommodations increase the quality of life and create independence for better social integration.



### Accessibility

Accessibility for all employees increases productivity and ensures that a broader pool of talent can apply for, maintain, and advance in Federal employment. Removing accessibility barriers in the work environment and supporting employees with disabilities or accessibility needs creates a happier, healthier, and more productive team. In addition, employees with disabilities or accessibility needs bring unique perspectives and experiences to the workplace since they naturally are creative and innovative to adapt to overcome challenges and obstacles in life. Accessibility reduces unconscious bias and develops a more complete and robust way of doing business which strengthens mission success.

Everyone experiences hardships and difficulties in their life. However, for people with disabilities and accessibility needs, hardships can be more frequent

### Alignment with Committee Strategic Goals

This section aligns with the following strategic goals from the DEIA Committee Charter:

- Identify and promote successful accessible techniques for integrating DEIA into human capital strategies to attract, recruit, and sustain talent.
- Increase collaboration amongst the OIG community to identify training and awareness resources that promote DEIA.
- Identify and promote effective techniques for incorporating DEIA initiatives into procurement and acquisition strategies to obtain goods and services from underrepresented businesses.

and have greater personal impact. Some factors in a person's workplace environment may be restrictive or pose hardships:

- A physical environment is not accessible.
- Lack of relevant technology (assistive, adaptive, and rehabilitative devices).
- Negative attitudes exist regarding another person's disability.
- Services, systems, and policies which are nonexistent and/or hinder the involvement of all people with a health condition, in all areas of life.

Workplace barriers may prevent some people from entering the workforce and others from performing jobs they could do with some form of accommodation. These barriers may be physical obstacles (such as inaccessible facilities or equipment), or they may be procedures or rules (such as rules concerning work performance, when breaks are taken, or how job tasks are to be done). Reasonable accommodations support employees who may need a change in the work environment or in the application process that would enable a person with a disability to enjoy equal employment opportunities. Employees may need accommodations in the short term (for situations like injury, illness, or pregnancy) or long term (for permanent disabilities).

Ensuring accessibility of products and services for all OIG employees and stakeholders is important for transparency, accountability, employee morale, diversity, equity, and inclusion purposes. Noncompliance can result in costly litigation against the OIG. Accessibility requirements are codified in the following laws.

• Rehabilitation Act of 1973. The Rehabilitation Act of 1973 (Rehab Act), codified at 19 U.S.C. 701, et seg., is a Federal law prohibiting discrimination on the basis of disability by Federal agencies, Federal contractors, or programs receiving Federal funds. It is generally considered a precursor to the Americans with Disabilities Act (ADA) of 1990. Title 42 U.S. Code Chapter 126 of the ADA, now codified at 42 U.S.C. §§ 12101, et seq., is broader than the Rehab Act, since it prohibits discrimination against individuals with disabilities in many areas of public life including in public services, places of public accommodation—such as restaurants, hotels, and theaters—and requires employers to make reasonable accommodations to allow employees with disabilities to do their jobs. While narrower in its application, the accessibility standards in the Rehab Act are generally the same as those in the ADA. Both laws protect employees with physical or mental disabilities that substantially limit one or more major life activities and who are unable to perform the essential job-related requirements without a reasonable accommodation to assist the employee.

Sections 504 and 508 of the Rehabilitation Act establish each agency's responsibilities to ensure accessibility. Both statutes impose different, yet related obligations that are intended to protect individuals with disabilities or accessibility needs from discrimination based on their disabilities. Agencies must consistently design, construct, develop, and maintain facilities, technology, programs and services so that all employees, including people with disabilities, can fully and independently perform their job. Specifically, Section 508 requires all Federal agencies to ensure that persons with disabilities (both employees and members of the public) have comparable access to and use of electronic information technology. That means that any electronic and information technology used, maintained, developed, or procured by OIGs must be accessible to persons with disabilities. Section 504 requires agencies to provide individuals with disabilities an equal opportunity to participate in programs and benefit from their services, including providing information to employees and members of the public.

• Americans with Disabilities Act of 1990. The Americans with Disabilities Act of 1990 (ADA), codified at 42 U.S.C. § 12101 et seq., prohibits discrimination on the basis of disability in employment, State and local government services, public accommodations, commercial facilities, transportation, and telecommunications. It's important for agencies to ensure that all accessibility standards contained in the ADA are within the ADA guidelines in places of public accommodation, commercial facilities, and Federal, State, and local government facilities in existence and in new construction, building alterations, renovations, and additions. The ADA standards are based on the minimum guidelines set by the U.S. Access Board. Agencies should use a range of research methods to determine their user accessibility and their employees' goals, needs, preferences, and expectations.

It is important to note that employees and stakeholders (nonemployees) are not required to disclose their disability, and not all disabilities are visible. Many prefer not to disclose for fear of retaliation or reprisal. By thinking strategically and pursuing the following routes, we can better meet and balance the needs of all OIG employees and OIG operations.

The routes and actions in this section help OIGs accomplish the following.

- Demonstrate top leadership commitment to and prioritization of accessibility for all OIG employees and stakeholders.
- Promote a clear alignment of OIG accessibility policies and procedures with the relevant laws and Federal requirements.
- Develop comprehensive strategies to demonstrate progress in recruitment, hiring, and promotion of people with disabilities.
- Be the example of excellence rather than an example of what not to do when establishing OIG accessibility programs.



Evaluation: Evaluate the OIG's products, services, policies, and procedures for compliance with accessibility requirements and identify areas for improvement and collaboration.

- 1. Review internal software applications and websites for compliance with standards of Section 504 and 508 of the Rehabilitation Act.
  - a. Obtain a basic understanding of what Sections 504 and 508 require. OIGs must recognize that compliance with Sections 504 and 508 is the OIG's responsibility and that there is potential liability for noncompliance.
  - b. Determine OIG's needs and what resources are already available at the OIG's respective department or agency, including who performs Section 504 and 508 functions.
  - c. Create an accessibility checklist with toolkits covering all aspects of Section 504 and section 508.
  - d. Determine who needs the OIG's products services and develop a plan to ensure accessibility of them.
- Identify what types of interactions could be difficult for disabled users, including individuals who may have vision, hearing, speech, or physical difficulties or impairments, as well as cognitive impairments such as reading difficulties, learning challenges, or other difficulties processing complex information.
  - a. Use automated tools and trained human testers to scan websites for Section 508 violations and accessibility barriers.
  - b. Take actions, as appropriate, to make improvements that remove barriers.
- 3. Identify the applicable Section 508 standards for each component of a technology solution, to include the following:
  - devices used to access agency content;
  - software used to run the devices;
  - electronic content provided through or produced by the agency;

- software used to view, interact, and navigate through the electronic content; and
- training and documentation provided on how to configure and use products.
- 4. Identify opportunities for collaboration.
  - a. Identify opportunities to collaborate with accessibility program managers or subject matter experts at the OIG's agency or department.
  - b. Identify opportunities to collaborate with other Federal OIGs to determine their approaches to comply with these legal requirements and learn about available resources.
  - c. Seek out Targeted Accessible Resources Give Employment Today (TARGET) Centers, such as the U.S. Department of Agriculture Target Center, to learn about the latest technology and services related to improve accessibility for employees.
  - d. Identify possibilities for OIGs to share resources and retain needed vendors or fee for service agreements.
  - e. Conduct research and benchmarking with other Federal agencies that have an established program, staff, and training needed for employees who will perform this function to establish best practices.
- 5. Undergo an Occupational Safety and Health Administration Safety Audit to measure and collect information about how reliable and effective a safety program is, determine whether your safety program meets your Agency's stated goals, and examine your employee safety training and response effort.<sup>3</sup> Types of safety reviews may include the following.
  - a. Compliance audits. These are audits in which safety rules and policies are reviewed by an official auditor. Failure to pass a safety audit can lead to Occupational Safety and Health Administration penalties. Compliance audits often evaluate safety programs, regulations, recordkeeping, and employee training programs that your Agency implements. Employers must certify that they have evaluated compliance with the provisions of this section at least every three years to verify that the procedures and practices developed under the standard are adequate and are being followed. (29 C.F.R. 1910.119, paragraph (o)).
  - b. Program audits. These generally test your safety programs directly. They check how effective your programs are and can identify gaps in your programs that could leave you vulnerable to incidents.

<sup>&</sup>lt;sup>3</sup> According to the Department of Labor's website, no existing or proposed Occupational Safety and Health Administration regulations govern the employment of individuals with disabilities, but the website does reference the requirements relating to the "Americans with Disabilities Act."

- c. Management system audits. These establish if your safety program properly addresses your company policy and Occupational Safety and Health Administration regulations. This type of safety audit includes compliance reviews, worker evaluations, and interviews and workplace observations.
- 6. Identify leading practices that have demonstrated progress in hiring, retaining, and promoting people with disabilities.
  - a. Make use of direct hiring authorities such as Schedule A and Veteran's Recruitment Appointment.
  - b. Remove barriers and challenges that may hinder participation in initiatives, programs and activities regarding professional development.
  - c. Establish and implement training and processes to promote diversity of thought and inclusion as it relates with persons with disabilities.
- 7. Review Job Accommodations Network.

- 1. Established baseline for current OIG progress with accessibility and accommodations.
- 2. Identification of gaps in resources, skills, and compliance with laws related to accessibility.
- 3. Increased opportunities for collaboration and partnership with other OIGs and the OIGs' respective agencies or departments.
- 4. Improved plans for hiring, retaining, and promoting people with disabilities.



Education: Increase staff awareness on accessibility, disability, and accommodations, as well as physical and attitudinal barriers to equitable opportunities.

#### **How Can We Get There?**

- 1. Demonstrate to staff that accommodation and accessibility are a priority.
  - a. Establish an email address to receive suggestions about what employees want to see in this area.

- b. Include the Agency's DEIA Strategic Plan, Equal Employment Opportunity Office contact information, and other visible information about accessibility policies on the OIG internal and external website.
- c. Include representative and diverse workforce demographics and images on all pages of the internal and external website.
- d. Establish or enhance policies and processes for how to respond to claims of discrimination based on disability and ensure staff are aware of the process for filing complaints.
- e. Establish or enhance policies and processes for employees to request reasonable accommodations and ensure employees are aware of the process and their rights.
- 2. Provide agency-wide training on meeting legal requirements and fostering a culture of equity, inclusion, and respect for people with disabilities.
  - a. Provide training on available resources to help OIGs meet the requirements of section 504 and section 508.
  - b. Invite internal and external speakers to give presentations about accessibility to enhance awareness within your OIG workforce.
- 3. Ensure recruiters, hiring managers and staff are educated and culturally competent about people with disabilities.
- 4. Provide training to relevant staff regarding accessibility to information and communication technology, to include use of information and data.
- 5. Provide training to staff about disabilities—which ADA defines as any physical or mental impairments that substantially limits a major life activity—including disabilities related to aging.
- 6. Regularly evaluate and update training based on evolving legal requirements and technology developments.

- 1. Responsibilities and roles are clearly defined for all levels of employees and all disciplines with regard to compliance with antidiscrimination and accessibility laws.
- 2. Increased cultural competence among staff and improved workplace inclusion of people with disabilities.
- 3. Increased awareness of and reduced stigma related to disabilities related to aging.
- 4. Improved and updated training programs that are responsive to changing requirements and needs.



# Execution: Promote leading practices and standards within the OIG to support equitable access and remove potential barriers.

#### **How Can We Get There?**

- 1. Create action plans, with metrics (milestones and benchmarks), goals (e.g., quarterly goals), and expected results.
- 2. Implement recruitment and hiring actions to demonstrate the OIG's commitment to accessibility
  - a. Include a statement encouraging applications from people with disability in all job advertisements.
  - b. Establish a Reasonable Accommodation Policy and make its existence known in job announcements and during the hiring process.
  - c. Publicize efforts to recruit and retain people with disabilities and ensure those efforts are easy to find on your website.
  - d. Establish a resource group for people with disabilities and use the group to assist in recruitment and onboarding processes.
- 3. Provide appropriate auxiliary aids where necessary to ensure an equal opportunity and access.
  - a. Different types of auxiliary aids may include Braille or large print versions of materials, electronic diskettes, audiotapes, qualified interpreters or readers, telecommunications devices for deaf persons, video captioning and other methods of making information available and accessible to persons with disabilities.
  - b. In considering what type of auxiliary aid to provide, OIGs must give primary consideration to the request of the individual with a disability and must honor that request, unless to do so would pose an undue burden. The OIG may then provide another effective means of communication, as appropriate.
- 4. Equip managers with tools and resources to support individual needs of people with disabilities.
- 5. Include accessibility program costs in all budget and procurement planning.

- a. Include funding to conduct outreach and procure resources or services that may be required for individuals.
- b. Include funding for training to managers and staff on accessibility related matters.
- 6. Implement policies and practices to ensure accessibility is identified as a core requirement for all IT-related procurements at your agency.
  - a. Collaborate with your agency's contracting or procurement office to ensure all information technology related solicitations identify and address Section 508 conformance requirements and acceptance criteria.
  - b. Create a governance process for procurement awards to ensure Section 508 conformance is addressed.
  - c. Track and monitor which electronic content does not need to conform to the Revised 508 Standards.
  - d. Establish a resource group for people with disabilities and use the group to assist in accessibility of technology selection, installment, and evaluation.

- 1. Improved alignment of OIG policies and procedures with accessibility laws and requirements, and effective implementation of policies and procedures, particularly in the areas of acquisition, software development, content management, cloud, human resources, and civil rights complaints, are closely aligned to and are effectively implemented.
- 2. Increase in compatibility of published electronic information so that people with disabilities who use assistive technology can better read and navigate electronic materials. If an electronic publication cannot be made compliant, the OIG must provide a reasonable alternative to the document.
- 3. Increase in program accessibility so that a program or activity is readily accessible to and usable by people with disabilities.
- 4. Increase in outreach to and input from people with disabilities to improve accessibility and usability of Federal technology selection, installment, and evaluation.

### **How Do We Measure Progress?**

The following table provides metrics for measuring progress in the area of accessibility.

Table 8. Measuring Progress for Stakeholders and Partners

Level	Description
4—Optimized	Validation is performed; results are measured and tracked. The OIG tests and validates agency digital services and technology solutions to ensure they comply with ADA statutory guidance standards. The OIG can determine whether policies and procedures are being followed. The OIG can measure the effectiveness of ADA policies and procedures and use the results to manage risk and prioritize opportunities for improving the OIG's compliance program.
3—Progressive	Resources committed and/or staff trained to implement policies, processes, and procedures. The OIG's leadership and staff understand and support compliance with ADA statutory guidance, standards, policies and procedures, and know how to implement them. The OIG has dedicated sufficient resources to implement statutory guidance on policies and procedures.
2—Defined	Policies, processes, and procedures defined and communicated. The OIG's approach to ensuring technology is compliant, defined, and integrated into its policies and procedures. Policies and procedures sufficiently address all technology the OIG buys, builds, maintains, and uses, as scoped by compliance standards.
1—Ad Hoc	No formal policies, processes, or procedures defined. The OIG has not established a framework for consistent management compliance.

### **How Should We Report Results?**

- 1. In accordance with OIG's EEO programs and related human resource programs, including the Federal Equal Opportunity Recruitment Program, the Selective Placement Programs, the Disabled Veterans Affirmative Action Program for annual reporting requirements, and Executive Order 14035.
- 2. Track and provide mandatory training on disability-related issues to all management officials, including facts to overcome stereotypes about people with disabilities and/ or targeted disabilities, detailed instructions on special hiring authorities and reasonable accommodation procedures.
- 3. Issue a monthly report to management showing OIG's progress in hiring, advancement, and retention of individuals with disabilities and or targeted disabilities.
- 4. Create conformance reports for Section 508 using manual test results that are well documented and based on normative testing using the guidance provided by the Chief Information Officer Council Accessibility Community of Practice.

### What References and Resources Can Help?

- <u>Section 508 Program Maturity</u>. Assessment tool for compliance with Section 508 programs.
- <u>U.S. Access Board</u>. Federal agency that promotes equality for people with disabilities through leadership in inclusive design and the development of accessibility guidelines and standards.
- 29 U.S.C. 794(d), Section 508. Federal law that requires agencies to provide individuals with disabilities equal access to electronic information and data comparable to those who do not have disabilities, unless an undue burden would be imposed on the agency.
- Executive Order 14035. "Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce."
- <u>Section508.gov</u>. GSA website that includes information on buying accessible products and services.
- <u>Section 508 Report to the President and Congress: Accessibility of Federal Information and Communication Technology</u>
- Senate Committee on Aging
- <u>"Unlocking the Virtual Front Door: An Examination of Federal</u>
   <u>Technology's Accessibility for People with Disabilities, Older Adults, and Veterans"</u> and <u>Summary of Recommendations</u>
- <u>Guide to Disability Rights Laws</u>. Overview of disability rights laws.
- <u>Pregnant Workers Fairness Act</u> (page includes <u>Tips for Requesting</u> <u>Reasonable Accommodations</u>)
- The American Deafness and Rehabilitation Association. Works in partnership with national organizations, local affiliates, professional sections, and individual members that provide social services and rehabilitation delivery for people who are deaf and hard of hearing.
- <u>American Association of People with Disabilities</u>. A national cross-disability rights organization, advocating for civil rights for the over 60 million Americans with disabilities by promoting equal opportunity, economic power, independent living, and political participation.
- American Council of the Blind. Composed of about 70 state chapters and special-interest affiliates representing a diverse range of groups within the blind community, including students, families, teachers, attorneys, governmental employees, entrepreneurs, vending stand operators, and the LGBTQ community.
- The Arc. A national community-based organization advocating for and serving people with intellectual and developmental disabilities and their families.

- <u>Council of State Administrators of Vocational Rehabilitation</u>. Composed of the chief administrators of the public rehabilitation agencies serving individuals with physical and mental disabilities in the States, District of Columbia, and the territories.
- <u>Deaf Initiative in Information Technology</u>. A project of the Applied Computer Technology Department of the National Technical Institute for the Deaf at the Rochester Institute of Technology that provides retraining workshops to deaf and hard-of-hearing adults already in the national workforce or preparing for employment in the information technology field.
- <u>Disability: IN</u>. Administers the annual Disability Equality Index, a free benchmarking tool that provides an objective score on disability inclusion policies and practices.
- Employer Assistance and Resource Network on Disability Inclusion.

  Supports organizations in their efforts to recruit, hire, retain, and advance qualified individuals with disabilities and educates organizations on ways to build inclusive workplace cultures.
- <u>Job Accommodation Network</u>. Offers free consulting on the Americans with Disabilities Act, job accommodations, and the employability of people with disabilities.
- <u>National Association of the Deaf</u>. An organization that works to preserve, protect, and promote the civil, human, and linguistic rights of deaf and hard of hearing people.
- <u>National Organization on Disability</u>. Focuses on increasing employment opportunities for the 80-percent of working-age Americans with disabilities who are not employed.
- TASH. Works to advance inclusive communities for people with significant disabilities and support needs through advocacy, research, professional development, policy, and information and resources for parents, families, and self-advocates.
- <u>Invisible Disabilities Association</u>. Provides awareness, education, and connection for people and organizations affected by invisible illness, pain, and disabilities.
- <u>Digital.gov</u>. Provides the Federal government with the tools, methods, practices, and policy guidance they need to deliver effective and accessible digital services.
- Computer/Electronic Accommodation Program. Provides assistive technology and devices as reasonable accommodations, to support individuals with disabilities and wounded, ill and injured Service members throughout the Department of Defense in accessing information and communication technology.

### **Terminology**

- Accessibility. The design, construction, development, and maintenance of facilities, information and communication technology, programs, and services so that all people, including people with disabilities, can fully and independently use them. Accessibility includes the provision of accommodations and modifications to ensure equal access to employment and participation in activities for people with disabilities, the reduction or elimination of physical and attitudinal barriers to equitable opportunities, a commitment to ensuring that people with disabilities can independently access every outward-facing and internal activity or electronic space, and the pursuit of best practices such as universal design. (Executive Order 14035, sec. 2(e))
- Attitudinal barriers. Attitudinal barriers are the most basic and contribute to other barriers. For example, some people may not be aware that difficulties in getting to or into a place can limit a person with a disability from participating in everyday life and common daily activities.
- Communication barriers. Experienced by people who have disabilities
  that affect hearing, speaking, reading, writing, and or understanding, and
  who use different ways to communicate than people who do not have
  these disabilities.
- Individual with a disability. A person who (1) has a physical impairment or mental impairment (psychiatric disability) that substantially limits one or more of such person's major life activities; (2) has a record of such impairment; or (3) is regarded as having such an impairment. This definition is provided by the Rehabilitation Act of 1973, 29 U.S.C. 701 et. seq., as amended.
- **Physical barriers**. Structural obstacles in natural or manmade environments that prevent or block mobility (moving around in the environment) or access.
- **Policy barriers.** Frequently related to a lack of awareness or enforcement of existing laws and regulations related to people with disabilities.
- **Social barriers.** Related to the conditions in which people are born, grow, live, learn, work and age that can contribute to decreased functioning among people with disabilities.
- Targeted disabilities. The most severe disabilities including blindness, deafness, partial and full paralysis, missing extremities, dwarfism, epilepsy, intellectual disabilities, and psychiatric disabilities. People with these disabilities typically have the greatest difficulty finding employment. As a matter of policy, the Federal government has a special emphasis on recruiting, hiring, and retaining people with targeted disabilities.
- **Transportation barriers.** A lack of adequate transportation that interferes with a person's ability to be independent and to function in society.



## **Our Progress**

To see how far you've come, you have to know where you started.

It's not our words that matter, it's our actions and results. OIGs know that data tells a story, and as we work to advance DEIA efforts across the community, we must collect and assess data to show our progress and identify areas where we still have opportunities to do more.



## Data Collection, Assessment, and Reporting

Data collection, assessment, and reporting is paramount to gathering quantitative and qualitative information on specific variables with the intention of evaluating outcomes or gleaning actionable insights. DEIA can be challenging and cannot be addressed by ad hoc programs and policies. Data analytics is integral to providing the ability to identify where there are gaps, prioritize areas for action, and enable ongoing measurements of progress and maturity.

The reliability of this data informs decision making, helps you identify gaps, support the advancement of DEIA efforts, assists with building strategies, supports resource decision, shows what you're doing well, and increases equity in your people.

## Alignment with Committee Strategic Goals

This section aligns with the following strategic goals from the DEIA Committee Charter:

- Survey your OIG for perspectives and viewpoints on DEIA (baseline and then annually).
- Assess the survey results for indicators of OIG-wide issues (baseline) and progress in addressing OIG-wide issues and maturity of the OIG's efforts to advance DEIA (annually).
- Report survey results (baseline and then annually).

The routes and actions in this section help OIGs accomplish the following.

- Identify gaps and build strategies.
- Inform and support decision making.
- Show areas to improve and measure progress.
- Increase staff retention and attract top talent.
- Increase productivity and innovation.



# Data Collection and Assessment: Design and oversee data collection methods to inform and support your OIG.

### How Can We Get There?

- 1. Evaluate your OIG's Workforce Profile (Demographics).
  - a. Collect demographics (e.g., ethnicity included in a MD 715 Report, series, grade, location, etc.).
  - b. Maintain demographics to assist with establishing a baseline and measuring progress.
  - c. Conduct trends and analyses to identify gaps, develop plans of action, and make improvements.
  - d. Work with Human Resources to implement staffing, recruitment, and hiring strategies. See Routes 4 through 6 of this Roadmap for more detailed steps.
  - e. Complete CIGIE's demographics survey annually to assist with measuring community-wide progress and maturity.
- 2. Assess OIG staff perspectives and viewpoints on DEIA.
  - a. Develop an employee viewpoint survey to evaluate perspectives and viewpoints on DEIA.
  - b. Complete the CIGIE community-wide DEIA Viewpoint Survey (every other year).
- 3. Assess the survey results for indicators for OIG issues (baseline) and progress in addressing community-wide issues and maturity of the OIG community's efforts to advance DEIA.

- 1. Increase in ideas and comments about ways to improve DEIA.
- 2. Identifiable areas to prioritize and actionable steps to address OIG concerns.
- 3. Trend analysis to compare with the OIG community-wide DEIA Maturity Assessments.
- 4. Sustained measurable progress within your OIG.



## Reporting: Implement reporting mechanisms to inform and support your OIG.

### How Can We Get There?

- 1. Based on survey results, develop tools (e.g., tables and charts) to track and depict survey results (baseline and then annually).
- 2. Report survey results to OIG staff, baseline and then annually to inform decision making.
- 3. Maintain a report on comparative analysis (baseline and then annually) to measure progress.
- 4. Develop plans of action, as needed, to make improvements and assist with advancing DEIA in your organization.

### What Should We See?

- Improvements and measurable progress in advancing DEIA in your organization
- 2. Evidence of a sense of belonging in your organization.
- 3. Increase in index scores from Federal Employee Viewpoint Survey.
- 4. Increase in attracting and sustaining top talent.
- 5. Elevation of productivity and innovation.

### **How Do We Measure Progress?**

The following table provides metrics for measuring progress in the areas of data collection, assessment, and reporting.

Table 9. Measuring Progress for Data Collection, Assessment, and Reporting

Level	Description
4—Optimized	Data collection, assessment, and reporting are key components of the OIG's mission and guiding principles. The OIG consistently demonstrates current leading practices in advancing DEIA. The OIG assesses, tracks, reports to the OIG staff the survey results to include gaps, at least annually. The OIG prioritizes areas for action and takes actionable steps to address the staff's concerns and shows measurable progress. The OIG consistently compares and assesses their results with the OIG community.
3—Progressive	The OIG consistently implements policies and procedures to advance DEIA throughout the organization. The OIG implemented a process to collect data, assess, and report data. The OIG routinely assesses and communicates the results to OIG staff and the results inform improvements.
2—Defined	The OIG's practices to advance DEIA are primarily implemented to comply with relevant laws and mandates. The OIG completes the DEIA Viewpoint Survey.
1—Ad Hoc	The OIG does not collect data about DEIA practices. Data collection has not been formally incorporated as part of the OIG's goals and strategies.

### What References and Resources Can Help?

- CIGIE Diversity, Equity, and Inclusion 2021 Baseline Survey Results
- CIGIE Diversity, Equity, Inclusion, and Accessibility 2022 Demographics Survey

### Appendix A. References and Resources

- <u>Executive Order 13583</u>, "Establishing a Coordinated Government-wide Initiative to Promote Diversity and Inclusion in the Federal Workforce," August 18, 2011
- <u>Executive Order 13985</u>, "Advancing Racial Equity and Support for Underserved Communities Through the Federal Government," January 20, 2021
  - Federal Register Vol. 86 No. 14 January 25, 2021 (Sec. 10 Revocation of Executive Order 13950)
  - Study to Identify Methods to Assess Equity: Report to the President, July 2021
- Executive Order 14035, "Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce," June 25, 2021
- The White House <u>Advancing Equity and Racial Justice Though the</u>
  <u>Federal Government</u> (includes Agency Equity Action Plans)
- The White House <u>Fact Sheet on Recommendations for Advancing Use of Equitable Data</u>, April 2022
- The White House <u>Government-Wide Strategic Plan to Advance</u>
  <u>Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce,</u>
  November 2021
- Partnership for Public Service, "A revealing look at racial diversity in the Federal government," July 2020
- OPM Government-Wide Diversity and Inclusion Strategic Plan 2011
- Diversity, Equity, Inclusion, and Accessibility Policy Template
- Association of International Certified Professional Accountants <u>Accounting Inclusion Maturity Model</u>
- Association of International Certified Professional Accountants <u>Diversity</u> and <u>Inclusion Competencies</u>
- <u>ADA National Network</u>, Information, Guidance and Training on the Americans with Disabilities Act
- Employer Assistance and Resource Network on Disability Inclusion
- Job Accommodation Network
- Computer/Electronic Accommodations Program

### Appendix B. Terminology

- Awareness. A state of knowing, gained through one's own perceptions or by means of outside information, having concern about and well-informed interest in a particular situation or development.
- **Baseline.** Results of an initial measurement against which future measurements of the same type will be compared against.
- Cultural Competence. Cultural competence is a set of congruent behaviors, attitudes, and policies that come together in a system, agency, or among professionals that enable effective work in cross-cultural situations. "Culture" refers to integrated patterns of human behavior that include the language, thoughts, communications, actions, customs, beliefs, values, and institutions of racial, ethnic, religious, or social groups. "Competence" implies having the capacity to function effectively as an individual or an organization within the context of the cultural beliefs, behaviors, and needs presented by consumers and their communities.
- **Disability.** According to the American Disability Act, a physical or mental impairment that substantially limits one or more major life activities.
- **Education.** The process of transferring knowledge, skills, values, beliefs, experiences, and habits of a person or group to others through storytelling, discussion, teaching, training, or research.
- **National origin.** An individual's, or their ancestor's, place of origin; or because an individual has the physical, cultural, or linguistic characteristics of a national origin group.
- OIG community. Refers to the 74 CIGIE-member OIGs.
- Special Hiring Authority. A special appointment authority that Federal hiring officials are authorized to use a when considering certain people with disabilities (e.g., those with intellectual disabilities, severe physical disabilities, or psychiatric disabilities). Use of this authority is at the discretion of each agency.
- U.S. Equal Employment Opportunity Commission (EEOC). Responsible for enforcing Federal laws that make it illegal to discriminate against a job applicant or an employee because of the person's race, color, religion, sex (including pregnancy, transgender status, and sexual orientation), national origin, age (40 or older), disability or genetic information.
- U.S. Office of Personnel Management (OPM). Serves as the chief human resources agency and personnel policy manager for the Federal government. OPM directs human resources and employee management services, administers retirement benefits, manages healthcare and insurance programs, oversees merit-based and inclusive hiring into the civil service, and provides a secure employment process.

- Unique OIG Workforce Members. Individual members of the OIG workforce. In this context, it refers to an unduplicated headcount of OIG workforce members receiving communications on training and awareness resources.
- Unique Opens. Refers to an unduplicated count of communications opened by OIG workforce members, i.e., an individual could open a single email communication multiple times but only the first time it was opened would be recorded.
- Veteran. A person who served in the active military, naval, or air service and who was discharged or released therefrom under conditions other than dishonorable.

## Appendix C. Acronyms

CIGIE Council of the Inspectors General on Integrity and Efficiency

DEIA diversity, equity, inclusion, and accessibility

DVSAS domestic violence, sexual assault, and stalking

EEOC Equal Employment Opportunity Commission

OIG Office of Inspector General

OPM U.S. Office of Personnel Management

OSDBU Office of Small and Disadvantaged Business Utilization

