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I. Privacy and Diversity Office Overview

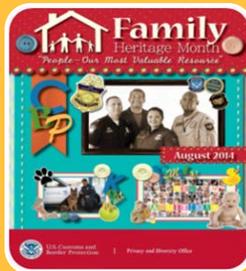
The Privacy and Diversity (PDO) is responsible for developing and implementing policy, procedures, and standard operating procedures to: create a culture of privacy within CBP, by safeguarding personally identifiable information (PII) while facilitating the lawful sharing of information; processing requests for information pursuant to the Freedom of Information Act (FOIA); preventing and addressing equal employment opportunity claims; addressing allegations of civil rights and civil liberties; implementing the White House Diversity and Inclusion Initiative; and implementing the Prison Rape Elimination Act.



Privacy Division: Develops and implements policy, procedures, and tools to create a culture of privacy within CBP. Maintains oversight of all CBP IT systems, technologies, rulemakings, programs, pilot projects, functional deployments, information sharing, and other activities to identify and address collections and uses of PII. Manage CBP’s privacy incident response and remediation efforts.



Freedom of Information Act Division: Develops and implements policy, procedures, and practices that ensure access to CBP records under provisions of the FOIA and the Privacy Act, subject to the protections and limitations provided for in these Acts.



Diversity and Civil Rights Division: Implements CBP’s Diversity and Inclusion Strategic Plan, which is designed to meet departmental goals for an inclusive and engaged CBP workforce. Develops and implements an outreach program to educate the CBP workforce on diversity and inclusion issues. Engages in counseling, mediation, and investigation activities to address and resolve EEO complaints at the lowest possible level and in accordance with the applicable regulations and policies. Ensures compliance with all EEOC decisions and settlement agreements. Provides EEO awareness and diversity training for all CBP employees.



Prison Rape Elimination Act/Civil Rights and Civil Liberties Division: Develops and administers all CBP programs and activities necessary to ensure compliance with civil rights and civil liberties requirements. Ensures that CBP maintains an efficient and effective external civil rights and civil liberties complaint-processing program focused on gathering all the relevant facts and evidence necessary to resolve alleged violations of civil rights or civil liberties and unlawful profiling. Develops civil rights and civil liberties training for CBP personnel. Leads CBP’s efforts to develop policies, procedures, and practices that advance the goals set forth in the Prison Rape Elimination Act of preventing sexual abuse in confinement facilities and supporting continued oversight of the detention system.

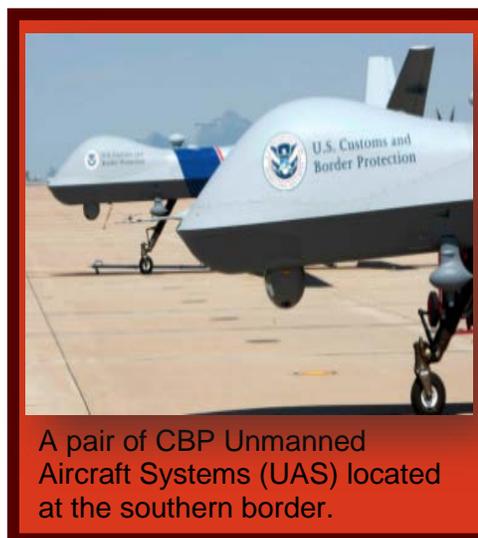


Policy, Planning and Performance Division: Develops strategic initiatives, implementing policies and procedures, performance standards, expectations and results measurement. Manages all staffing related matters, manages executive taskings and mail processing, and manages knowledge management and skill develop for staff and managers.

II. CBP Privacy Program Achievements: Mandated by the Privacy Act of 1974, the E-Government Act of 2002, and the Homeland Security Act of 2002, CBP, as a component of DHS, must prepare System of Records Notices (SORNs), Privacy Impact Assessments (PIAs), and Privacy Threshold Analyses (PTAs) for all IT systems and CBP Operational practices that involve the collection, use, and retention of PII. During FY 2014, CBP completed or updated thirty-nine PTAs and published seven PIAs.

A. The PIAs are as Follows

- **DHS/CBP/PIA-017 – Non-Intrusive Inspections Systems Program (NII).** NII covers CBP use of large and medium scale devices to image the contents of shipping containers and commercial shipments to identify contraband and weapons of mass destruction. The NII Systems are integrated into CBP's Cargo screening process to ensure that additional screening using the imaging devices does not disrupt the flow of compliant trade through the ports of entry. The NII PIA discusses the minimal potential privacy risks associated with the system and how CBP has employed safeguards to mitigate those risks.
- **DHS/CBP/PIA-020 – Export Information System.** The EIS PIA, in conjunction with the forthcoming EIS SORN, provides coverage for CBP's collection and use of Export Information—specifically export manifest information. The PIA discusses how CBP collects and processes export information, in conjunction with the Census Bureau, to meet its collective U.S. Government's export compliance needs. Publication of the EIS PIA in conjunction with the conclusion of a Memorandum of Agreement between the Departments of Commerce and Homeland Security laid the foundation for the International Trade Data System (ITDS) information sharing goals adopted in the President's Executive Order on Streamlining the Export/Import Process for America's Businesses.
- **DHS/CBP/ICE/USCIS/PIA-023 Biographic Visa and Immigration Information Sharing with Canada (BVIIS).** This PIA serves to establish privacy coverage for the implementation of sharing border crossing information between the U.S. and Canada to strengthen compliance with their respective non-immigrant visa programs; the underlying agreement that prompted the need for this PIA addresses the absence of a means for either nation to collect departure information at their mutual land border ports of entry. The PIA addresses the management of risks



A pair of CBP Unmanned Aircraft Systems (UAS) located at the southern border.

associated with each nation sharing biographical data from arriving persons with the other nation to provide the receiving nation with a corresponding exit record. The information sharing implements an aspect of the Beyond the Borders agreement between the U.S. and Canada and the PIA establishes safeguards for the limited arrival data to be shared as a means of satisfying the elements of a departure record.

- **DHS/CBP/PIA-006(c) – Automated Targeting System (ATS) Update (TSA/CBP COP).** ATS is a decision support tool that compares traveler, cargo, and conveyance information against law enforcement, intelligence, and other enforcement data using risk-based targeting scenarios and assessments.
- **DHS/CBP/PIA-006(d) – Automated Targeting System (ATS) Update.** This PIA update expanded the integration between CBP's ATS and TSA's Secure Flight systems to allow for a common operational picture—the ability to display relevant information about a traveler from both systems on the same screen to enhance targeting efforts and improve screening efficiency.
- **DHS/CBP/PIA – 024(a) Arrival and Departure Information System (ADIS).** This update to the ADIS PIA provides coverage for a bulk sharing agreement between DHS and the National Counter-Terrorism Center of foreign national arrivals and departures to and from the United States.
- **DHS/CBP/PIA – 022 Border Surveillance Systems (BSS).** The BSS PIA provides comprehensive coverage for the several types of camera, radar, underground sensor, and radio signals collection technology employed at and along the national border by CBP. The PIA identifies the different systems to discuss their operational deployment and the management of the privacy risks associated with these collection activities. Typically deployed in the border areas between the Ports of Entry, BSS enhances CBP's immigration, security, and contraband enforcement activities.

A CBP officer captures biometric information (fingerprints) during a Global Entry interview.



B. Safeguarding of CBP Information Sharing

- Reviewed over 840 one-time requests for information from CBP systems, and issued an authorization memorandum specific to each case. CBP's role as executive agent for the Federal Government at the border, places critical reliance upon the breadth of information collected from persons and about

merchandise in support of regulatory compliancy and law enforcement investigations and prosecutions.

- Reviewed and cleared 24 Memoranda of Agreement supporting trade compliance and border security missions of CBP and other federal government agencies.

C. CBP Privacy Incident Response and Mitigation Program

- Managed and continued to mitigate 36 CBP-only privacy incidents involving a potential or actual compromise of PII during the year.
- Continued to advocate for implementing active IT solutions to remove Social Security Numbers from CBP systems.

D. CBP Privacy Training and Outreach

- Updated the TECS Privacy Awareness Course (TPAC), as part of the overall TECS modernization effort; the TPAC is required training for all persons with access to TECS. Additionally, passage of the exam at the end of the TPAC forms a requirement and certification of completion of the training, not only for TECS, but also for the Automated Targeting System and the Analytical Framework for Intelligence.
- Briefed NTEU National Labor Counsel on the status of an investigation into a major privacy incident, by a contract service provider, with the potential to impact a significant percentage of the CBP workforce.

E. CBP Privacy Oversight

- Briefed House Homeland Security and Appropriations Committee Staff on the privacy issues associated with CBP, Office of Air and Marine, use of Unmanned Aircraft Systems relative to the CBP Border Security mission.
- Briefed House Homeland Security Committee Staff on the privacy compliance established to cover CBP's use of Border Search Authority to examine electronic devices and CBP's plans to update the compliance.
- Prepared a comprehensive Privacy Compliance Directive for all of CBP.
- Prepared an Operational Use of Social Media Directive and Rules of Behavior for all of CBP.

III. CBP FOIA Program

The Freedom of Information Act (FOIA) implements the principle that persons have a fundamental right to know what their government is doing. Due to the symbiotic relationship between privacy and FOIA, PDO is also responsible for CBP's FOIA program.



CBP's HQ FOIA staff along with CBP's Deputy Commissioner Kevin McAleenan.
October 15, 2014.

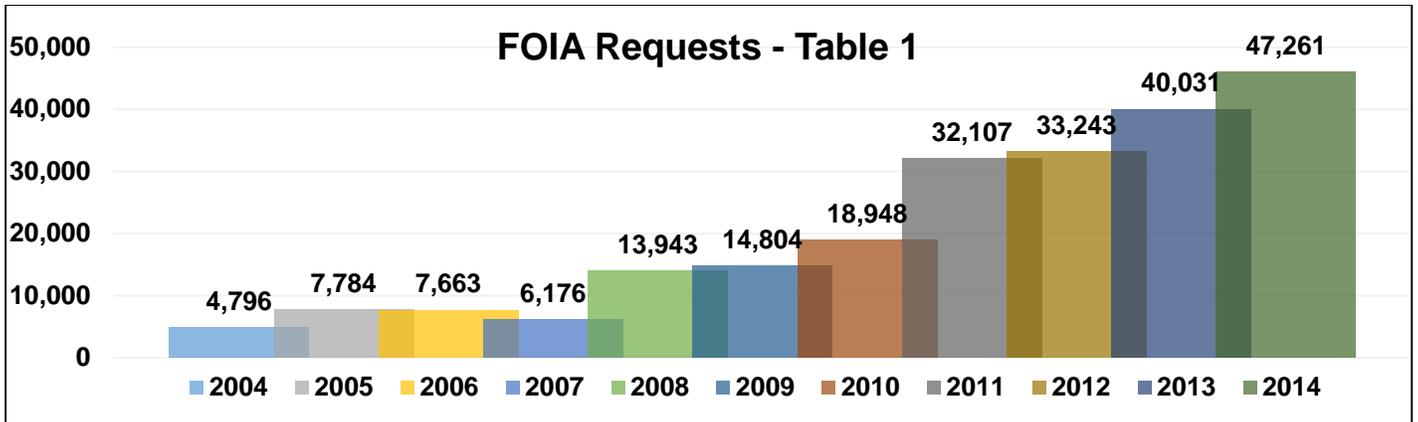
A. On a typical day during FY 2014, CBP's FOIA Division

- received 181 FOIA requests
 - 153 requests for travel related documents
 - 95 requests for travel and/or border apprehensions
 - 33 requests for records of entry and exit
 - 5 requests for I-94 information
 - 1 request for PNR information
 - 19 requests for A-File information
 - 1 personnel records request
 - 2 background investigations
 - 3 Fines, Penalties, & Forfeitures (FP&F) or Import/Export Requests
 - 6 requests from commercial or media requesters
 - 16 requests determined to contain insufficient information, or be a duplicate of a previous request
 - closed 196 FOIA requests
-
- ✓ 67 partial grants/partial denials
 - ✓ 3 full grants

- ✓ 1 full denial
- ✓ 38 no records found
- ✓ 26 A-Files transmitted to USCIS
- ✓ 34 requests with insufficient information to process
- ✓ 27 requests determined to be duplicate submissions of previous requests

B. FOIA Request Trend-Line

Table 1 below illustrates that the number of FOIA requests received by CBPs increased by over 1,165% between FY 2004 and FY 2014. To address the ever increasing flow of FOIA requests, CBP realigned the FOIA program from the Office of International Trade in FY 2012 to the Office of the Commissioner. CBP’s FOIA management process was redesigned, they developed a workflow maps for processors and supervisors, and drafted a CBP-wide FOIA Directive.



C. CBP FOIA Processing by Month

| Table 2: CBP FOIA Intake/Closures by Month | Intake | Closures | Pending |
|--|---------------|---------------|---------|
| October | 3,513 | 879 | 42,757 |
| November | 2,770 | 1,426 | 44,101 |
| December | 3,118 | 1,902 | 45,317 |
| January | 2,961 | 2,416 | 45,862 |
| February | 2,834 | 3,111 | 45,585 |
| March | 3,274 | 2,903 | 45,956 |
| April | 3,934 | 3,574 | 46,316 |
| May | 4,365 | 3,702 | 45,979 |
| June | 5,168 | 5,182 | 44,965 |
| July | 5,116 | 5,385 | 43,696 |
| August | 4,704 | 4,359 | 43,041 |
| September | 5,504 | 16,217 | 38,122 |
| Total | 47,261 | 51,056 | |

Table 2 above shows that while the number of FOIA requests received by CBP continued to increase during FY 2014, we were able to close 51,056 requests. CBP's current FOIA backlog is 38,122. Table 2 shows the following:

- During the first quarter, CBP received 9,400 FOIA requests and closed 4,207, which represented a 44.75% deficit between the total received and the number closed during the same period.
- During the second quarter, CBP received 9,069 FOIA requests and closed 8,430, which represented a 9.29% deficit between the total received compared to the number closed during the same period.
- During the third quarter, CBP received 13,467 requests and closed 12,458, which represented a 9.25% deficit between the total received compared to the number closed during the same period.
- During the fourth quarter, CBP received 15,324 FOIA requests and closed 25,961. The amount closed exceeds the number received by 59%.
- During FY 2014, CBP received 47,261 FOIA requests and closed 51,056. The number of requests closed exceeds the amount received by 9.2%.

Table 3 below shows that during FY 2014 the DHS components received 291,242 FOIA Requests. At the end of FY 2014, there were 117,880 FOIA requests pending among the various DHS components. The majority of the pending FOIA requests, 57,671 (48.92%) are assigned to ICE. With 38,122 (32.33%) assigned to CBP and 13,387 (11.35%) assigned to CIS. The remaining 8.4% belong to the other DHS components as shown below.

| Table 3 | Pending-Start FY 2014 | Received-FY 2014 | Processed-FY 2014 | Pending-End of FY 2014 |
|--------------|-----------------------|------------------|-------------------|------------------------|
| USCIS | 11,293 | 143,794 | 141,700 | 13,387 |
| CBP | 41,907 | 47,261 | 51,056 | 38,122 |
| ICE | 6,234 | 85,081 | 33,644 | 57,671 |
| NPPD | 4,758 | 7,775 | 5,581 | 4,439 |
| USCG | 936 | 3,203 | 2,620 | 1,519 |
| USSS | 728 | 1,061 | 1,045 | 744 |
| PRIV | 43 | 705 | 665 | 83 |
| FEMA | 560 | 772 | 508 | 824 |
| TSA | 631 | 859 | 491 | 999 |
| I&A | 34 | 244 | 255 | 23 |
| OIG | 51 | 177 | 166 | 62 |
| FLETC | 3 | 103 | 99 | 7 |
| CRCL | 3 | 80 | 74 | 9 |
| S&T | 1 | 68 | 68 | 1 |
| OPS | 0 | 59 | 59 | 0 |
| Total | 67,182 | 291,242 | 238,031 | 117,880 |

Table 4 shows how FOIA requests were processed and closed by all DHS components. CBP processed 51,056 FOIA requests as follows:

- Granted complete records in 2,065 cases.
- Partially Granted records in 80 cases.
- No responsive records were found in 9,840 cases.
- Records were referred to another Federal agency for review in 28 cases.
- Requests were withdrawn in 605 cases.
- Released was denied in 13 cases due to fees.
- Requestors failed to reasonably describe record in 158 cases.
- Requests were found to be improper in 8,859 cases.
- Requests were in properly directed to CBP in 6,694 cases.
- The reminding 119 cases were closed for “other” reasons.

| Table 4 | FOIA Closures |
|--------------------------|----------------|
| Full-Grant | 11,684 |
| Partial Grant | 82,666 |
| Denied | 5,315 |
| No Records Found | 16,892 |
| Records Referred | 853 |
| Request Withdrawn | 135 |
| Fee Related Denial | 153 |
| Not Reasonably Described | 1 |
| Improper Request | 5,773 |
| Not Agency Request | 4,527 |
| Duplicate | 13,694 |
| Other | 7 |
| Total | 141,700 |

| Table 5 | Simple FOIA Requests | | Complex FOIA Requests | | Expedited FOIA Requests | |
|----------------|----------------------|--------------|-----------------------|--------------|-------------------------|--------------|
| | Avg. Days | Highest Days | Avg. Days | Highest Days | Avg. Days | Highest Days |
| CBP | 6.83 | 20 | 262.52 | 1,055 | 42.8 | 194 |
| CRCL | 9.61 | 20 | 24.43 | 83 | N/A | N/A |
| FEMA | 10.9 | 20 | 213.82 | 1,770 | 468 | 855 |
| FLETC | 18.31 | 122 | N/A | N/A | N/A | N/A |
| I&A | 29.84 | 134 | 56.31 | 427 | N/A | N/A |
| ICE | 35.37 | 550 | 69.88 | 643 | 98.7 | 632 |
| NPPD | 114.47 | 222 | 45.44 | 480 | 11 | 11 |
| OIG | 31.52 | 248 | 124.55 | 654 | 141 | 203 |
| OPS | 2.55 | 14 | 8 | 19 | N/A | N/A |
| PRIV | 5.37 | 20 | 82.48 | 404 | N/A | N/A |
| S&T | 8.83 | 30 | 87.13 | 342 | 17.5 | 20 |
| TSA | 2.89 | 20 | 259.47 | 1,235 | 172 | 172 |
| USCG | 9.21 | 20 | 92.77 | 1,153 | 39.33 | 91 |
| USCIS | 20.32 | 357 | 36.81 | 393 | 51.28 | 110 |
| USSS | 12.58 | 20 | 207.12 | 1,820 | 1 | 1 |
| Total | 21.24 | 550 | 112.2 | 1,820 | 104.26 | 855 |

Table 5 above shows the average amount of time required to process the three different types of FOIA requests by each DHS component. With regard to CBP:

- Simple requests were processed within 6.83 days on average.
- Complex requests were processed with 262.52 days on average.
- Expedited FOIA requests were processed within 42.8 days on average.

| Table 6 | FOIA Requests Received | Closed FOIA Requests | FTE - FOIA Office | Collateral Duty Staff | Total Staff | Processing Cost | Litigation Cost | Total Costs |
|---------|------------------------|----------------------|-------------------|-----------------------|-------------|-----------------|-----------------|----------------|
| 2014 | 47,261 | 51,056 | 39 | 18.26 | 57.26 | \$5,287,415.00 | \$40,778.00 | \$5,328,193.00 |
| 2013 | 41,381 | 14,635 | 34 | 16.22 | 50.22 | \$4,422,723.41 | \$376,815.71 | \$4,799,539.12 |
| 2012 | 33,243 | 26,571 | 39 | 15.38 | 54.38 | \$4,500,687.17 | \$4,393.58 | \$4,505,080.75 |
| 2011 | 32,107 | 27,818 | 27 | 11.86 | 38.86 | \$4,947,584.53 | \$3,921.92 | \$4,951,506.45 |

Table 6 above shows the cost associated with CBP’s FOIA program between FY 2011 and FY 2014.

- The primary point to illustrate in Table 6 is that the number of FOIA requests have increased by 67.79%, from 32,107 in FY 2011 to 47,261 in FY 2014.
- The total cost has only increased by 9.36%.
- The Office of Chief Counsel was unable to provide litigation cost for FY 2014.

| Table 7 | Requests Received | FTE – FOIA Office | Collateral Duty Staff | Total Staff | Processing Cost | Litigation Cost | Total Costs |
|----------------|-------------------|-------------------|-----------------------|---------------|------------------------|-----------------------|----------------------|
| USCIS | 143,794 | 212 | 9.5 | 221.5 | \$20,469,919.15 | \$768,637.08 | \$21,238,556.23 |
| ICE | 85,081 | 33 | 16 | 49 | \$9,581,485.00 | \$899,749.00 | \$10,481,234.00 |
| CBP | 47,261 | 39 | 18.26 | 57.26 | \$5,287,415.00 | \$0.00 | \$5,287,415.00 |
| USCG | 3,203 | 14 | 22.85 | 36.85 | \$3,761,536.88 | \$0.00 | \$3,761,536.88 |
| FEMA | 772 | 13 | 15.29 | 28.29 | \$2,956,689.30 | \$0.00 | \$2,956,689.30 |
| PRIV | 705 | 16 | 1 | 17 | \$3,282,034.00 | \$15,000.00 | \$2,499,758.50 |
| USSS | 1,061 | 17 | 4.15 | 21.15 | \$1,853,071.75 | \$429,318.05 | \$2,282,389.80 |
| TSA | 859 | 8 | 3.1 | 11.1 | \$1,117,747.30 | \$22,895.00 | \$1,140,642.30 |
| NPPD | 7,775 | 4 | 3 | 7 | \$873,910.00 | \$56,000.00 | \$929,910.00 |
| OIG | 177 | 4 | 0.25 | 4.25 | \$335,686.30 | \$69,539.70 | \$405,226.00 |
| I&A | 244 | 2 | 0.7 | 2.7 | \$205,145.00 | \$0.00 | \$205,145.00 |
| FLETC | 103 | 1 | 0.55 | 1.55 | \$161,453.53 | \$0.00 | \$161,453.53 |
| CRCL | 80 | 1 | 0 | 1 | \$113,346.00 | \$0.00 | \$113,346.00 |
| S&T | 68 | 0 | 0.5 | 0.5 | \$79,864.00 | \$28,966.50 | \$108,830.50 |
| OPS | 59 | 0 | 0.33 | 0.33 | \$38,000.00 | \$2,000.00 | \$40,000.00 |
| Total | 291,242 | 364 | 95.48 | 459.48 | \$50,117,303.21 | \$2,292,105.33 | 52,409,408.54 |

Table 7 above shows the FOIA cost associated with all DHS components.

- CBP spends approximately \$111.00 per FOIA received.
- CIS spends approximately \$147.00 per FOIA received.
- ICE spends approximately \$123.00 per FOIA received.

Table 8 depicts the amount of FOIA fees collected from the public.

- CBP collected \$313,036.28. This represented 89.64% of the total amount collected by all DHS components.
- The amount collected by CBP represented only 5.92% of the cost requirement to administer the FOIA program.

| Table 8 | Total Amount of Fees Collected | Percentage of Total Costs |
|----------------|---------------------------------------|----------------------------------|
| CBP | \$313,036.28 | 5.92% |
| USCG | \$22,376.56 | 0.59% |
| USCIS | \$5,487.80 | 0.03% |
| OIG | \$3,700.50 | 1.10% |
| NPPD | \$2,500.00 | 0.29% |
| FEMA | \$1,608.00 | 0.05% |
| S&T | \$497.00 | 0.62% |
| CRCL | \$0.00 | 0.00% |
| FLETC | \$0.00 | 0.00% |
| I&A | \$0.00 | 0.00% |
| ICE | \$0.00 | 0.00% |
| OPS | \$0.00 | 0.00% |
| PRIV | \$0.00 | 0.00% |
| TSA | \$0.00 | 0.00% |
| USSS | \$0.00 | 0.00% |
| Total | \$349,206.14 | 0.71% |

IV. Diversity and Inclusion Management

A. CBP Commissioner's Diversity and Inclusion Policy Statement



It is the policy of CBP to continue our efforts to build and advance a diverse and inclusive Federal law enforcement organization in which the knowledge, skills and abilities of all employees are fully utilized to achieve our demanding mission. Our diverse and professional workforce interacts with international travelers from around the world every day, and we must remember that to these individuals, we represent the United States of America. By reflecting America's diversity, each day CBP is able to provide a wide range of ideas and innovative solutions making us a stronger, more effective organization.

Therefore, to continue to build CBP, and sustain our reputation as the premier border enforcement agency in the world, we must fully utilize the benefits of diversity and inclusion management principles to maintain a positive work environment where both similarities and differences of individuals are acknowledged and valued. To fully integrate the ideals of diversity and inclusion in the workplace, we must enhance our management practices, employee recruitment, and in all job categories. In addition, to demonstrate our commitment to the highest aspirations of diversity and inclusion, we must continue to implement CBP's multi-year Diversity and Inclusion Strategic Plan, which is a concerted effort to advance and honor the diversity that our employees bring to the workplace, encourage respect, and serve as a catalyst to achieve our homeland security mission.

I encourage all employees to learn more about and fully embrace the principles necessary to build a more diverse and inclusive work environment. At CBP, we don't simply espouse the concepts of diversity and inclusion, they are a fundamental part of who we are. We live these concepts every day, in every interaction we have with our co-workers and members of the trade and travelling public. Please join me in celebrating and expanding the very foundation of what we are: a strong, resilient, multi-talented and diverse workforce.

B. Diversity and Inclusion Strategic Plan (Fiscal Years 2013 - 2018)

In response to Executive Order 13583 – [Establishing a Coordinated Government-Wide Initiative to Promote Diversity and Inclusion in the Federal Workforce](#), CBP developed a Diversity and Inclusion Strategic plan to develop and implement a more comprehensive, integrated, and strategic focus on diversity and inclusion as a key component of the Agency’s human resources strategies. In addition to the Diversity and Inclusion Strategic Plan, continuing efforts will be undertaken to identify and adopt best practices to promote diversity and inclusion and to identify and remove any barriers to equal employment opportunity, consistent with merit system principles and applicable law.

CBP’s Diversity and Inclusion Strategic Plan spans FY 2013-2018 and focuses on the following goals:

| | |
|---------------------|---|
| Workforce Diversity | Recruit from a diverse, qualified group of potential applicants to secure a high-performing workforce drawn from all segments of American society. |
| Workplace Inclusion | Cultivate a culture that encourages collaboration, flexibility, and fairness to enable individuals to contribute to their full potential and feel valued and supported. |
| Sustainability | Institutionalize diversity and inclusion management as a key strategic priority, through continued leadership commitment, accountability, and total workforce engagement. |

At the heart of CBP’s Diversity and Inclusion Strategic Plan are practices and procedures that facilitate the development of a diverse workforce and an inclusive environment to continuously improve both individual and organizational performance. Outlined in the multi-year plan are 58 action items, distributed among the three goals, scheduled for completion through FY 2018. As of the end of FY 2014, 36 of the 58 action items (62.1%) have been completed or are ongoing and recurring.

Some key accomplishments over the previous year include:

- Issuing a Commissioner’s policy statement affirming support for diversity and inclusion;
- Reviewing participation rates in CBP/DHS leadership development programs to determine whether participation rates are in-line with workforce representation rates; and
- Developing a quarterly diversity dashboard that provides metrics and data about CBP’s workforce demographics, employment of individuals with disabilities, and the percentage of new hires who are veterans.

C. Diversity and Inclusion Management Council

CBP continued its executive-level support for diversity and inclusion through its Diversity and Inclusion Management Council (DIMC), which services as an advisory body to CBP's Commissioner. The DIMC is comprised of CBP's senior leadership team, all Assistant Commissioners and independent office heads, and represents all CBP offices and programs. The DIMC supports and fosters effective diversity and inclusion management practices, promotes diversity initiatives at all levels of CBP, and strives to integrate the principles of diversity and inclusion management into CBP's day-to-day operations. The DIMC helps to demonstrate the highest level of organizational commitment to diversity and inclusion management by identifying strategic goals, assigning initiatives to specific CBP offices, identifying anticipated outcomes and appropriate metrics to support CBP's Diversity and Inclusion Strategic Plan.

In FY 2014, the DIMC, led by Acting Deputy Commissioner Kevin A. McAleenan, accomplished the following strategic goals:

- Endorsed the development of local Diversity and Inclusion Management Councils in eight regional areas spanning the Nation, which will be headed by the most senior leaders in their respective regions;
- Promoted the development of Employee Resource Groups to help CBP develop a more targeted approach to address diversity and inclusion issues; and
- Advocated for the development of a quarterly diversity dashboard, accessible by all CBP employees, to increase transparency and provide information on the status CBP's efforts to build and maintain a diverse and inclusive workforce.

D. Embedding Diversity and Inclusion Throughout CBP

CBP continues to consider new and innovative ways to engage the workforce and embed diversity and inclusion into the organizational culture. In FY 2014, CBP



Top: On September 2, 2014, employees at the Ponce Port of Entry, San Juan Field Office, paid tribute to Asian Pacific American Heritage Month in a joint program with the U.S. Department of Agriculture.

Bottom: On September 2, 2014, San Juan Area port employees got together to highlight the historical efforts to reach women's equality, with the central topic of "Women's Suffrage."



developed and launched three new webinars: Disability Etiquette; Diversity and Inclusion; and Preventing and Addressing Workplace Discriminatory Harassment. These webinars, which are accessible by all CBP employees, serve as additional awareness and training resources.

CBP continued to utilize collateral duty staff members to provide leadership, coordination, and direction, as members of Diversity and Inclusion Program Committees (DIPC) in CBP locations throughout the Nation. DIPC members play a vital role in helping to establish and maintain a diverse, inclusive, and highly engaged workforce. DIPCs are invaluable to CBP's diversity and inclusion strategy as they: assist local management in their efforts to achieve CBP's diversity and inclusion goals; develop and sponsor local diversity and inclusion events and activities; and plan and engage in outreach to local colleges, universities and community organizations.

E. Workforce Analysis

CBP continued its ongoing evaluation of human capital management programs, policies, and practices for barriers to EEO. During FY 2014, trend analyses of the following were completed:

- *Workforce Diversity Profiles* - An analysis of workforce representation was conducted for CBP's Senior Executive Service, supervisory and non-supervisory employees, program offices, and major occupations.
- *Succession Management Programs* - An analysis was conducted of participation rates in CBP's succession management programs designed to prepare candidates for advancement into mission critical leadership positions.
- *Workforce Discipline* - An analysis of Agency-wide discipline was conducted to determine if barriers or trends could be identified based on prohibited discriminatory factors.
- *Workforce Salaries* - An analysis was conducted to assess changes in salary distribution among various groups within CBP's workforce.

These analyses were incorporated into CBP's Management Directive 715 (MD-715) Annual EEO Program Status Report and are a part of CBP's ongoing efforts to establish and maintain a model EEO program.

F. Examining CBP Workforce Statistics for Diversity and Inclusion

Diversity and inclusion remains a high priority and an important theme that permeates CBP's management philosophy. CBP's leadership team is focused on eliminating barriers that restrict EEO for all individuals and dedicated to promoting an environment of inclusion, cultural appreciation, and awareness, which supports the development and advancement of all employees. Between FY 2010 and FY 2014, CBP's overall workforce increased by 1.4% and many Ethnicity and Race Indicator (ERI) groups are close to, or exceed, parity with the Civilian Labor Force (CLF).¹ As part of CBP's

¹ CBP utilizes an adjusted CLF benchmark that controls for citizenship status.

diversity and inclusion strategy, CBP regularly conducts targeted outreach and recruitment to increase representation of qualified candidates from underrepresented groups in CBP's workforce.

On February 11, 2014, CBP hosted a Black History Month event at the Ronald Reagan Building in Washington, D.C., The events guest speaker was Dr. Steve Perry, CNN Education Contributor, Essence Best Selling Author of "Man Up! Nobody is Coming to Save Us," and Founder of Capital Preparatory Magnet School in Hartford, Connecticut.

Bottom Photo (left to right): DCR Officer Courtney M. Mack; Assistant Commissioner, OA, Eugene H Schied; Executive Director, PDO, Franklin C. Jones, Guest Speaker Dr. Steve Perry; Director, Privacy and Diversity, Darlene M. Sedwick; Executive Director, Office of Administration, Jaye M. Williams; and Rev. Dr. Wayne L. Moore.



G. Five Year Demographic Trend

The following table provides CBP's demographic breakdown for the previous five fiscal years.

| CBP Workforce by Gender and ERI - 5 Year Trend | | | | | | |
|---|------------|----------------|----------------|----------------|----------------|----------------|
| CBP Onboard Workforce | CLF | FY 2010 | FY 2011 | FY 2012 | FY 2013 | FY 2014 |
| Male | 51.9% | 78.3% | 78.8% | 79.0% | 79.3% | 79.4% |
| Female | 48.1% | 21.7% | 21.2% | 21.0% | 20.7% | 20.6% |
| American Indian or Alaska Native | 1.1% | 1.0% | 1.0% | 0.9% | 0.9% | 0.8% |
| Asian | 3.9% | 4.8% | 4.7% | 4.7% | 4.7% | 4.7% |
| Black or African American | 12.0% | 7.1% | 6.9% | 6.8% | 6.8% | 6.9% |
| Hispanic or Latino | 10.0% | 35.6% | 35.1% | 34.4% | 34.3% | 34.0% |
| Native Hawaiian or Other Pacific Islander | 0.1% | 0.4% | 0.4% | 0.4% | 0.4% | 0.4% |
| White | 72.4% | 50.8% | 51.5% | 52.3% | 52.6% | 52.8% |

- Female representation has slightly declined from 21.7% to 20.6%, and is currently below the CLF of 48.1%.
- Black or African American representation has slightly declined from 7.1% to 6.9%, and is currently below the CLF of 12.0%.
- From FY 2010 to FY 2014, the representation of ERI groups within CBP's workforce has remained relatively stable. With the exception of Native Hawaiians or Other Pacific Islanders and Whites, all other ERI groups experienced a slight decline in representation.

H. CBP Law Enforcement Workforce Demographics

For limited comparison, the following table depicts CBP's law enforcement demographics as compared to a snapshot of selected Federal sector law enforcement demographics.² Some of CBP's law enforcement workforce demographics are close to, or exceed, parity with the overall Federal law enforcement community's representation of minority ERI groups - notably American Indians or Alaskan Natives, Asians and Native Hawaiians or Other Pacific Islanders, Hispanics or Latinos, and Individuals of Two or More races. Females represent 11.5% of CBP's law enforcement positions compared with 15.5% in Federal law enforcement overall. Black or African Americans represent 4.6% of CBP's law enforcement positions compared with 10.4% in Federal law enforcement overall. Note: Separate statistics on Asians and Native Hawaiians or Other Pacific Islanders are not currently available.

| Gender and ERI of Federal Officers - Arrest and Firearm Authority | | | | | | |
|---|--------|--------------------------------|------------------------|---------------------------|--------------------|-----------------|
| Agency | Female | American Indian/ Alaska Native | Asian/Pacific Islander | Black or African American | Hispanic or Latino | Two or More |
| CBP (Armed Officers) | 11.5% | 0.9% | 4.5% | 4.6% | 38.9% | 0.4% |
| Bureau of Prisons | 13.6% | 1.4% | 1.6% | 24.1% | 12.9% | 0.0% |
| FBI | 18.8% | 0.4% | 3.9% | 5.4% | 8.1% | 0.2% |
| ICE | 15.7% | 0.7% | 3.8% | 8.3% | 24.3% | -- ³ |
| Secret Service | 10.5% | 0.6% | 2.7% | 11.2% | 5.2% | -- |
| DEA | 9.6% | 0.4% | 2.6% | 7.1% | 9.3% | 0.0% |
| Marshals Service | 10.2% | 0.7% | 2.2% | 7.4% | 9.6% | 0.1% |
| ATF | 13.0% | 1.1% | 2.1% | 8.5% | 5.8% | 1.6% |
| Overall - Federal | 15.5% | 1.0% | 3.0% | 10.4% | 19.8% | -- |



² The most current available information on Federal law enforcement statistics from the Bureau of Justice Statistics, released June 2012, is based on 2008 census data and is only provided for limited comparison.
³ Percentage represents less than 0.05.

The following table provides a breakdown of the workforce demographics for CBP's most populous law enforcement occupations.

| Law Enforcement Demographics of CBP Workforce ⁴ | | | | | | |
|--|-------------|------------------------|-------|----------|------------------------|-----------------------|
| CBP Workforce Onboard | CBP Officer | CBPO ⁵ RCLF | BPA | BPA RCLF | Air Interdiction Agent | AIA RCLF ⁶ |
| Male | 82.0% | 53.6% | 95.0% | 85.2% | 98.4% | 76.4% |
| Female | 18.0% | 46.4% | 5.0% | 14.8% | 1.6% | 23.7% |
| American Indian or Alaska Native | 0.91% | 1.2% | 0.8% | 1.0% | 1.9% | 1.1% |
| Asian | 7.1% | 5.0% | 1.1% | 2.2% | 0.6% | 2.1% |
| Black or African American | 7.3% | 11.2% | 1.8% | 12.6% | 2.3% | 11.8% |
| Hispanic or Latino | 29.7% | 8.7% | 49.9% | 12.3% | 10.5% | 11.3% |
| Native Hawaiian or Other Pacific Islander | 0.6% | 0.2% | 0.2% | 0.2% | 0.0% | 0.1% |
| White | 53.8% | 73.2% | 46.0% | 71.0% | 84.0% | 73.2% |
| Two or More | 0.6% | 0.6% | 0.2% | 0.7% | 0.7% | 0.5% |

CBP Officer (CBPO)



- Many ERI groups are close to or exceed parity with the Relevant Civilian Labor Force (RCLF).
- Females represent 18.0% of CBPOs, as compared with 46.4% in the RCLF.
- Black or African Americans represent 7.3% of CBPOs, as compared with 11.2% in the RCLF.

Border Patrol Agent (BPA)



- Females represent 5.0% of BPAs, as compared with 14.8% in the RCLF.
- Black or African Americans represent 1.8% of BPAs, as compared with 12.6% in the RCLF.

Air Interdiction Agent (AIA)



- Many ERI groups are close to or exceed parity with the RCLF.
- Females represent 1.6% of AIAs, as compared with 23.7% in the RCLF.
- Black or African Americans represent 2.3% of AIAs, as compared with 11.8% in the RCLF.

⁴ Percentages may not total 100% due to rounding.

⁵ CBP Officer = CBPO; Relevant Civilian Labor Force = RCLF; Border Patrol Agent = BPA; Air Interdiction Agent = AIA.

⁶ The RCLF is the portion of the CLF data that are directly comparable to the occupational population being presented.

V. Implementing CBP's Diversity and Inclusion Initiative

A. Field Diversity and Inclusion Achievements

- **Diversity and Inclusion Programs:** CBP DIPCs strive to ensure that all ethnic and nationality groups in our CBP family are acknowledged and celebrated. We believe that it is important to honor our heritage and celebrate those elements of ourselves that we value and respect as individuals. Through CBP monthly observance activities, DIPC volunteers and employees around the nation continue to cultivate a culture where similarities and differences of individuals are respected and valued. CBP is using DIPC volunteers and designees across the country to help build diversity through increased cultural awareness, education, and appreciation of differences. During FY 2014, 828 DIPC volunteers sponsored 1,077 workplace diversity activities, with 77,442 in total attendance for the year.

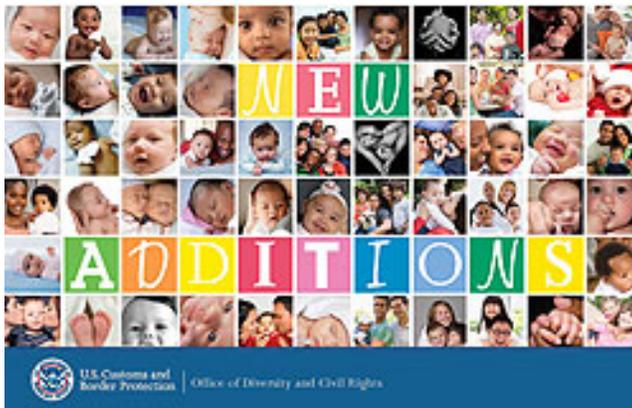
The table below provides an overview of the celebrations and acknowledgments for some of the numerous ethnic groups and nationalities represented in our workforce.

| Acknowledgements and Celebrations | | | |
|---|----------------|----------------|-------------|
| Diversity and Inclusion Programs | FY 2013 | FY 2014 | % |
| American Indian Heritage Month | 65 | 61 | -6.2% |
| Arab American Heritage Month | 40 | 62 | 55.0% |
| Asian Pacific American Heritage Month | 70 | 82 | 17.1% |
| Black History Month | 143 | 120 | -16.1% |
| Bring Your Child to Work Day | 50 | 78 | 56.0% |
| Caribbean American Heritage Month | 36 | 52 | 44.4% |
| Disability Employment Awareness Month | 58 | 51 | -12.1% |
| Disability Mentoring Day | 1 | 0 | -100.0% |
| Dr. Martin Luther King, Jr. Day of Service | 66 | 82 | 24.2% |
| Dutch American Heritage Day | 5 | 9 | 80.0% |
| Family Heritage Month | 35 | 67 | 91.4% |
| German American Day | 17 | 14 | -17.6% |
| Hispanic Heritage Month | 81 | 57 | -29.6% |
| Irish American Heritage Month | 70 | 61 | -12.9% |
| Italian American Heritage Month | 38 | 30 | -21.1% |
| Jewish American Heritage Month | 34 | 47 | 38.2% |
| Lesbian, Gay, Bisexual, and Transgender Pride Month | 43 | 50 | 16.3% |
| Polish American Heritage Month | 19 | 14 | -26.3% |
| Veterans' Day | 58 | 20 | -65.5% |
| Women's History Month | 104 | 103 | -1.0% |
| Women's Equality Day | 9 | 11 | 22.2% |
| Other | 17 | 6 | -64.7% |
| Total | 1,059 | 1,077 | 1.7% |

- **Community Outreach:** Nationally, DIPC volunteers collaborated with local community organizations (e.g., high schools, colleges, and churches) to make CBP a more diverse and inclusive place to work by participating in 159 community outreach events to educate the public about CBP's mission and career opportunities

B. New Additions

- PDO continued to promote employee engagement through its New Additions gallery, which is a website where employees can announce a new addition within their own family, whether it is a newborn, adopted, or foster child. Many employees have already posted pictures and entries of their new additions. To participate in New Additions, employees must send their child's or children's photo in JPEG format along with some brief information (child's name, child's age, and parent's name and duty location) about their new addition to the PDO point of contact. During FY 2014, the site welcomed 29 new additions to the CBP family.



On April 22, 2014, the Port of New Orleans participated in the Greene County HS Career Day.



Vital information about career fields within the Agency was provided to students.



VI. Managing Reasonable Accommodation Requests

A. Reasonable Accommodation - Disability

CBP is committed to providing reasonable accommodation for its employees and applicants for employment in order to ensure that qualified individuals with disabilities enjoy full access to equal employment opportunity, unless a particular accommodation would impose an undue hardship on the operation of CBP's programs. During FY 2014, 73 individuals requested a reasonable accommodation based on a disability, which represents a 34.2% decrease compared to FY 2013 (111 requests). CBP continued to partner with the Department of Defense's (DOD) Computer/Electronic Accommodations Program (CAP) to ensure that employees with disabilities have equal access to information technology and opportunities in CBP. CAP increases access to information and works to remove barriers to employment opportunities by eliminating the costs of assistive technology and accommodation solutions.



On September 30, 2014, CBP kicked off National Disability Employment Awareness Month with a brown bag lunch n' learn on reasonable accommodation and accessible systems technology for individuals with disabilities. The event was co-sponsored by PDO and OIT.

To facilitate the efficient processing of reasonable accommodation requests for persons with disabilities, PDO took the following actions:

- Continuously featured links on the PDO Internet webpage with information on how to request a reasonable accommodation including the following:
 - ✓ CBP Directive No. 51713-007A, Reasonable Accommodation Procedures for Applicants and Employees with Disabilities;
 - ✓ CBP Guide to Processing Reasonable Accommodation Requests Based on a Disability;
 - ✓ CBP Pre-Employment Testing and Managerial Assessment Accommodation Procedures;
 - ✓ CBP Request for Reasonable Accommodation Form;
 - ✓ Frequently Asked Questions: Reasonable Accommodation Based on a Disability; and
 - ✓ Frequently Asked Questions: Confidentiality and Disclosure of Medical Information.
- Made CBP supervisors who attended Supervisory Leadership Training aware of CBP's commitment to provide reasonable accommodations for employees and applicants with disabilities. During FY 2014, 589 new supervisors completed this training on various dates throughout the year, which taught supervisors about the reasonable accommodation process and resources available to

provide accommodation through CAP and the Job Accommodation Network (JAN).

- Worked with the CBP Section 508 Coordinator and the DHS Office of Accessible Systems and Technology (OAST) to improve the coordination between offices so as to facilitate more effective accommodations regarding assistive technology and related requests.

B. Reasonable Accommodation - Religion

It is the policy of CBP to prohibit discrimination against employees and applicants for employment based on religious beliefs, practices, or affiliation. In addition, CBP shall provide reasonable accommodation for the religious beliefs and/or practices of employees and applicants for employment unless providing an accommodation would result in undue hardship. CBP will strive to ensure that accommodations provided will be the least restrictive alternative and will be narrowly tailored to remove the particular burden for which the accommodation is sought. During FY 2014, PDO facilitated the processing of 33 individual requests for reasonable accommodation based on religious beliefs and/or practices, which represents a 10.0% increase compared to FY 2013 (30 requests).

To facilitate the efficient processing of requests for reasonable accommodation based on religious beliefs and/or practices, PDO took the following actions:

- On September 17, 2014, PDO provided Reasonable Accommodation of Religious Beliefs or Practices training to the Office of Internal Affairs, Credibility Assessment Division Professionals.
- Continuously featured links on the PDO Internet webpage with information on how to request a reasonable accommodation including CBP Directive No. 51713-012, Reasonable Accommodation for Religious Beliefs and Practices and Frequently Asked Questions: Reasonable Accommodation for Religious Beliefs or Practices.

VII. Disability Program Management

A. CBP Plan to Increase CBP's Employment of Individuals with Disabilities

In FY 2014, CBP continued the implementation of its multi-year Plan to Increase U.S. Customs and Border Protection's Employment of Individuals with Disabilities. The Plan outlines the strategies and actions CBP will take to increase the number of individuals with disabilities from 2.7% of the workforce to 3.2% by the end of FY 2017. At the end of FY 2014, individuals with disabilities represented 2.80% of CBP's workforce. In FY 2014, CBP hired a total of 42 individuals with disabilities, including three with targeted disabilities. As a proactive measure to ensure that all individuals with disabilities who are hired have the reasonable accommodations they need to be successful starting from the first day of work, CBP notifies prospective employees of their right to request reasonable accommodations to perform job duties or receive benefits or privileges of employment in their final selection letters. In addition, a web link to the CBP internet website is also included so individuals can view the procedures for receiving and facilitating requests and submit an electronic request form.



On November 15, 2013, CBP hosted a National Disability and Veterans Day event at the Ronald Reagan Building in Washington, D.C. titled "Because We are Equal to the Task."

B. Disability Program Training

As a part of CBP's Plan, all hiring managers and human resources professionals are required to take a web-based training module on the employment of individuals with disabilities. The web-based training is entitled Employment of People with Disabilities: A Roadmap to Success, which was launched in May 2012. This course provides CBP managers and supervisors with resources, strategies, and tips for successfully hiring and managing employees with disabilities. In FY 2014, 800 managers completed the web-based training.

CBP is committed through its Supervisory Leadership Training (SLT) Program to investing in the leadership development of all its managers and supervisors. During the SLT, all new supervisors are required to complete a module on EEO Awareness. During FY 2014, 589 new supervisors completed this training and learned about diversity and inclusion management. The module also includes a section on the reasonable accommodation process and provides information on the resources available through CAP and JAN.

Additionally, CBP offered several virtual learning courses to introduce supervisors and managers to their roles and responsibilities with regard to the EEO Program and to provide valuable information on diversity and inclusion and how everyone in CBP can

benefit from these principles. These courses included: EEO Awareness for Supervisors and Managers 1: Supporting EEO; EEO Awareness for Supervisors and Managers 2: Preventing Discrimination; and Diversity and Inclusion Awareness. During FY 2014, CBP supervisors and managers completed 1,961 EEO/Diversity related virtual learning courses.

CBP continued to cultivate relationships with external organizations to improve the employment and retention of employees with disabilities. During FY 2014, members of the PDO staff received training on disability etiquette from the Co-Director of JAN; JAN is a service of the U.S. Department of Labor's Office of Disability Employment Policy and is the leading source of expert guidance on workplace accommodations, disability related legislation, and disability employment issues. This training included tips on interacting with employees with disabilities, addressed myths about disabilities, and provided ideas on how to improve accessibility.

C. National Disability Employment Awareness Month

During FY 2014, CBP sponsored 51 programs around the country in support of National Disability Employment Awareness Month, which had a total of 4,168 attendees participated, including 196 managers. Additionally, CBP distributed materials on its Intranet web site (CBP.net) and publically on its Internet web site (CBP.gov) to honor the contributions of workers with disabilities and inform the workforce that they represent a highly skilled talent pool to help CBP complete its homeland security mission.

D. Additional Resources

CBP launched a Disability Resources Webpage, which serves as a clearinghouse of information and is accessible by all CBP employees. Some of the resources include information on: CBP's work-life programs; accessibility, and training and development.

CBP developed and promoted a webinar version of the disability etiquette training so that all members of the CBP workforce could benefit from the tips and strategies provided, dispel myths and stereotypes, and help foster inclusion throughout the work place.

VIII. Addressing Allegations of Discriminatory and Sexual Harassment

A. Reporting, Addressing, and Investigating Allegations of Discriminatory Harassment

Allegations of discriminatory and sexual harassment are reviewed in concert with CBP's Harassment Allegation Response Team (i.e., Office of Internal Affairs (IA), Office of Chief Counsel (CC), HRM, and PDO), to determine the appropriate course of action based on the information available. All allegations are documented and assessed to determine the appropriate investigative jurisdiction and advice and guidance is provided to assist managers and supervisors in taking prompt, appropriate, and effective action to prevent recurrence when warranted. Allegations of discriminatory and sexual harassment are tracked and monitored until final management action is taken, when warranted by the facts of the case, to correct the effects on the employee and ensure that the harassment does not recur. During FY 2014, 182 allegations of discriminatory or sexual harassment were reported to PDO, which represents an 18.0% decrease as compared to FY 2013 (222).

To facilitate the prompt reporting and investigation of acts of suspected discriminatory harassment and the implementation of remedial measures when allegations are substantiated, PDO took the following actions:

- Issued CBP's updated Anti-Discrimination and Anti-Harassment Policy, signed by Commissioner R. Gil Kerlikowske on July 18, 2014, affirming CBP's commitment to equal opportunity and the fair treatment of all employees. This policy strictly prohibits unlawful discrimination, the unfavorable treatment of a person or class of persons based on their protected status under Federal law, and assures employees that workplace harassment will not be tolerated, allegations of harassment will be immediately investigated, and, where allegations are substantiated, prompt and appropriate action will be taken.
- To ensure that all CBP employees were made aware of their obligations under this policy, PDO accomplished the following:
 - ✓ Issued guidance to the Assistance Commissioners and Independent Office Directors including sample communication to affirm their individual commitment to CBP's Anti-Discrimination and Anti-Harassment Policy.
 - ✓ Disseminated the policy to all CBP employees in a message titled "Commitment to a Workplace Free of Discrimination and Harassment" via *CBP Central*.
 - ✓ Developed and ensured delivery of a muster module titled "EEO is Everyone's Responsibility" at all CBP duty locations.
 - ✓ Notified the workforce of the availability of the following resources to promote and maintain a work environment that is free of discrimination and harassment:

- VLC Course: “Basic EEO Awareness Training for Employees” (TRAEN Course Code ID 059001),
- VLC Course: “EEO Awareness for Supervisors and Managers 2: Preventing Discrimination” (TRAEN Course Code ID 059703),
- A Webinar titled [Preventing and Addressing Workplace Discriminatory Harassment](#) (accessed from the PDO CBPnet Secure home page), and
- Instructor-led EEO Awareness Training delivered by the servicing DCR Officer.



IX. Managing CBP's EEO Complaint Program

A. CBP's EEO Complaint Management Program

CBP has delegated authority from the Department of Homeland Security (DHS), CRCL, to implement the U.S. Equal Employment Opportunity Commission's (EEOC) regulations set forth in 29 C.F.R. Part 1614 pertaining to the processing of workplace EEO complaints⁷ of discrimination. CBP is committed to resolving complaints of discrimination at the earliest possible point in the complaint process, at the lowest managerial level, and to processing all complaints in accordance with the applicable regulations and policies.⁸

B. FY 2014 Informal EEO Counseling Statistical Analysis

- **Rate of Workforce⁹ Growth Relative to Complaints**

CBP's workforce overview as depicted in the chart below, provides the context for the achievements outlined in the area of EEO complaints management. Throughout the section, workforce growth of CBP, DHS, and the Federal sector will be used to establish per capita data. From FY 2010 through FY 2014, CBP's workforce grew 1.5%, while DHS grew by 2.8% and the Federal sector by 3.1%.¹⁰

- **Per Capita¹¹ EEO Counseling Requests Received**

While CBP's workforce increased by 1.5% between FY 2010 and FY 2014, the requests for informal EEO counseling received by PDO decreased by 22.4%. During the same time period, the rate of requests for EEO counseling in DHS increased by 11.9% and decreased Federal government-wide by 14.9%.

We believe this result can be attributed to the outstanding efforts of PDO staff members to educate and inform the workforce in order to prevent and address potential EEO issues before the behavior or actions rise to the level of an EEO claim. While the per capita rate for informal EEO counseling activity has fluctuated, it has declined by 0.2% from FY 2010 to FY 2014. The chart below illustrates CBP's rate is below both the DHS rate of 1.1% and the Federal rate of 1.2%.

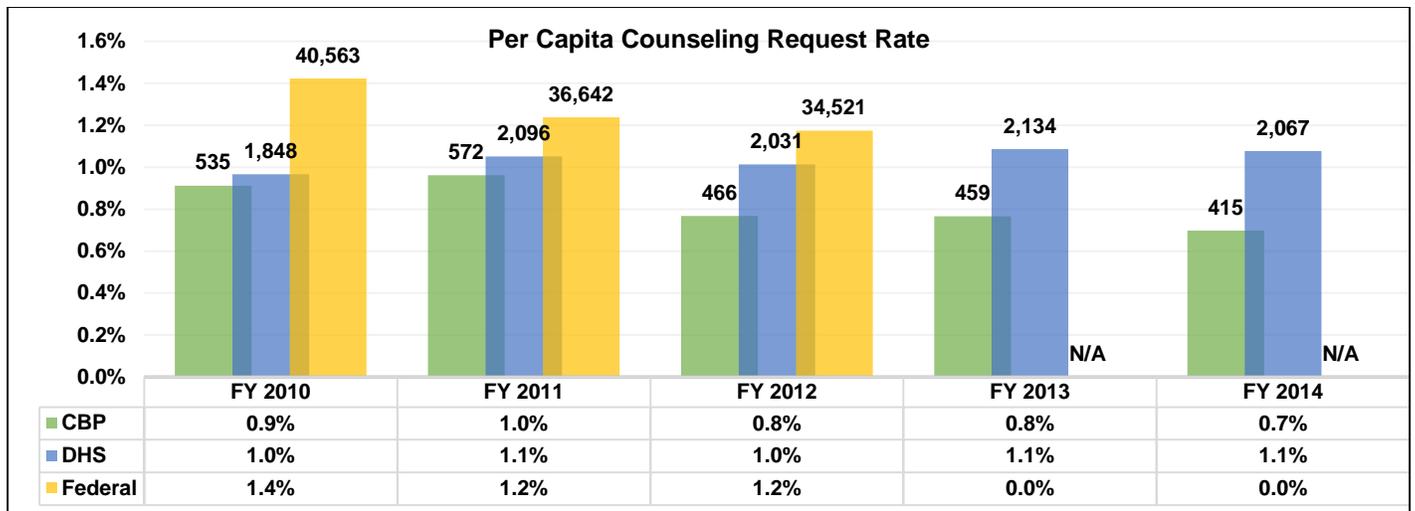
⁷ In civil rights matters, discrimination refers to unfavorable or unequal treatment of a person or class of people because of the following factors (called protected classes): race, color, sex, sexual orientation, age, religion, national origin, physical or mental disability, genetic information, status as a parent, or reprisal for participation in the EEO complaint process or for opposing discriminatory practices. It also includes harassment because of a protected class and failure to reasonably accommodate one's religion or disability.

⁸ Additionally, federal law prohibits discrimination on the basis gender identity, pregnancy, childbirth, or related medical conditions.

⁹ Comparative Federal workforce data for FY 2014 is not available at this time; Federal workforce FY 2012 comparative data was retrieved from the EEOC *Annual Report on the Federal Work Force (Part 1) Fiscal Year 2012*, Table B-1 which is available [here](#).

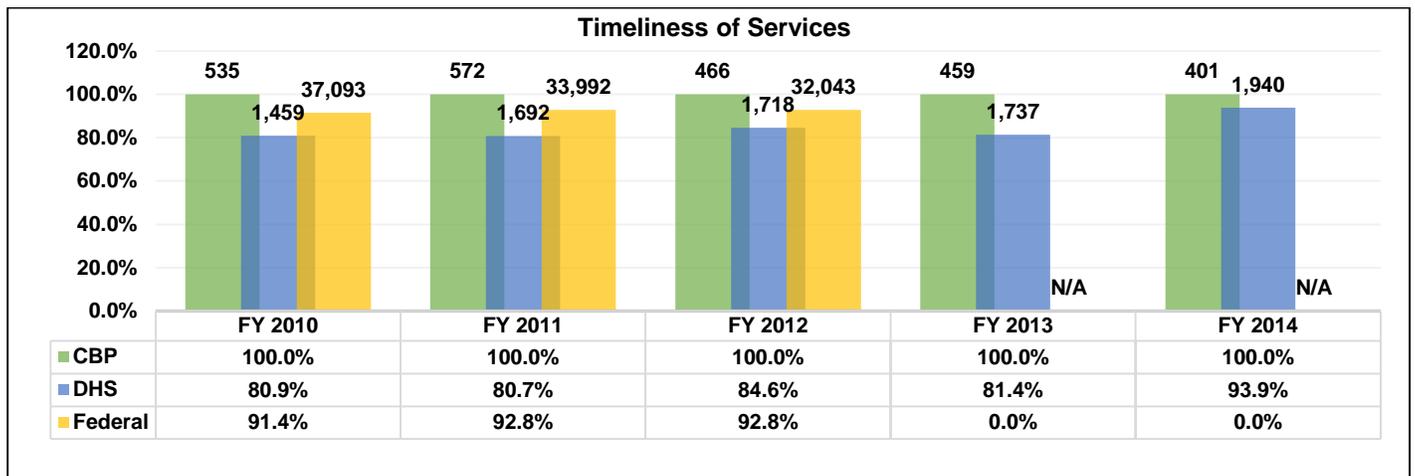
¹⁰ The Federal workforce percentage decrease is from FY 2010 to FY 2012.

¹¹ Per capita is a Latin prepositional phrase which translates to "by heads" or in this specific instance for each individual or person in CBP's workforce.



• **Timeliness of EEO Counseling Services¹²**

PDO's rate of timeliness for processing informal counseling cases has remained at 100.0% through for the past four fiscal years. PDO's timeliness rate for completed counseling exceeds the DHS average timeliness rate of 84.3% and the Federal sector average timeliness rate of 92.3%.¹³



• **Mediation - Informal Counseling Stage¹⁴**

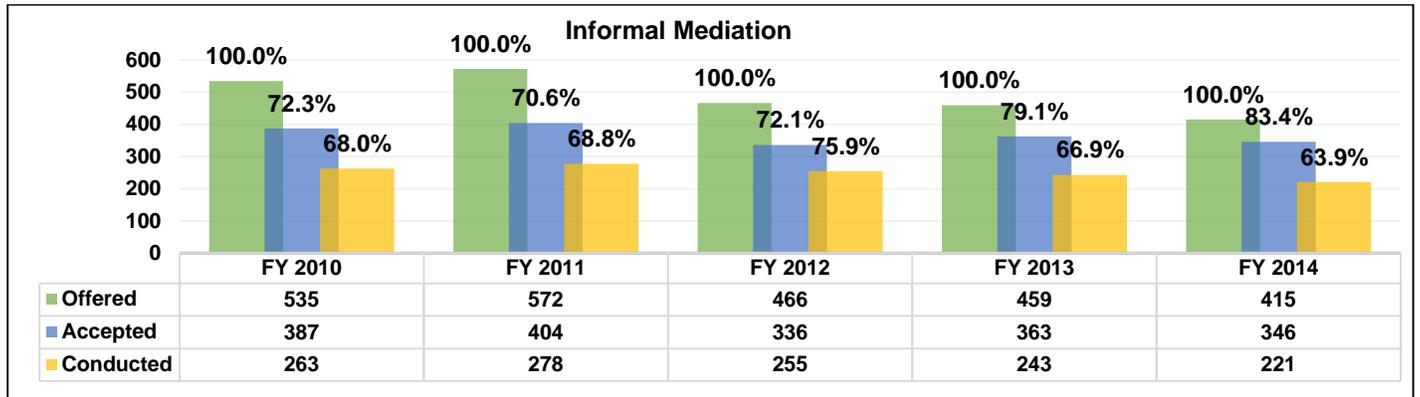
The chart below illustrates PDO's initiative to increase the use of mediation at the lowest managerial level, and earliest possible point in the EEO complaint process was highly successful. The number of individuals electing to participate in mediation during

¹² During FY 2014, PDO received 415 informal counseling requests. Of those, 14 were open as of the date of this report. Timeliness was determined based upon the 401 completed counseling's at this time.

¹³ The Federal average timeliness rate is from FY 2009 to FY 2012.

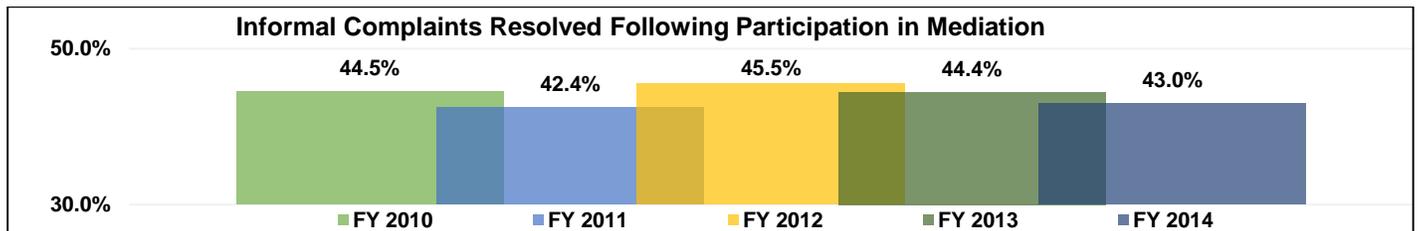
¹⁴ As of December 3, 2014, there were 14 open informal complaints. Of those, mediation was accepted for 14 (or 100.0% of) complaints. The number of mediation requests and sessions conducted may increase as cases are closed.

the informal counseling stage significantly increased from 72.3% in FY 2010 to 83.4% in FY 2014.



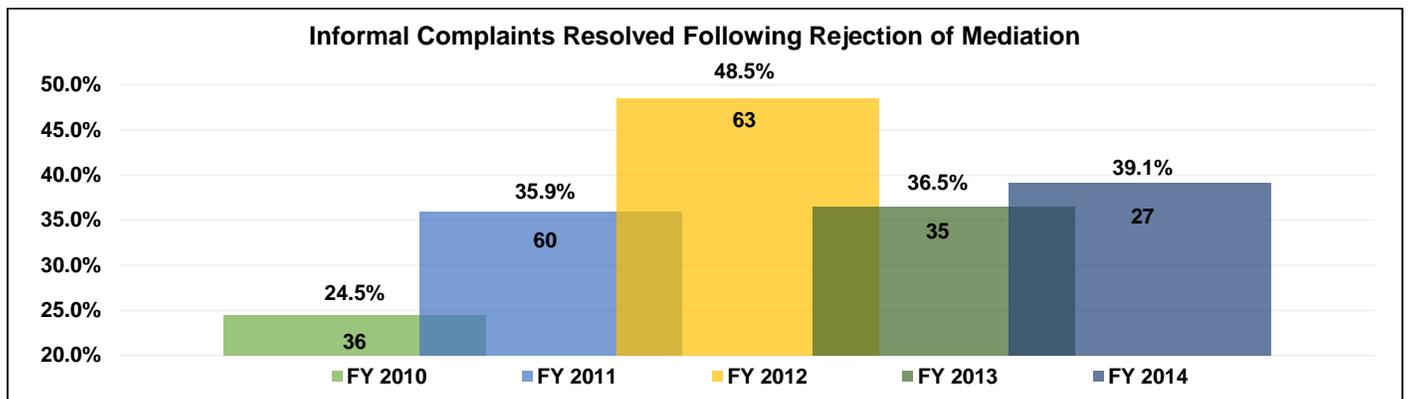
• **Resolution Rate Following Mediation (Informal Counseling)**

The total number of individuals who elected not to file a formal complaint after participating in mediation slightly decreased from 44.5% in FY 2010 to 43.0% in FY 2014.



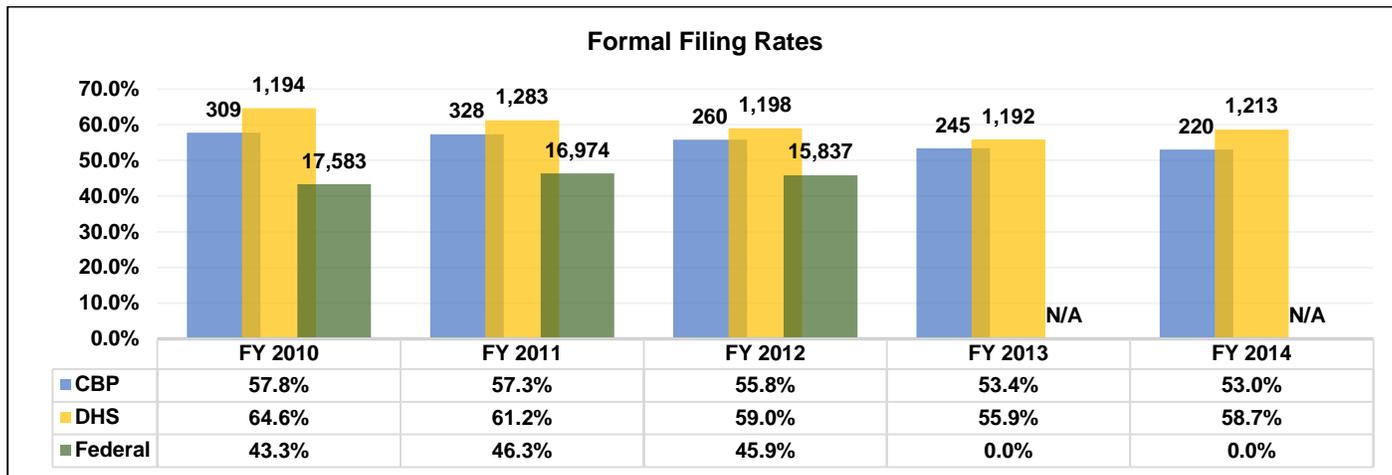
• **Filing Rate - Mediation Rejected**

From FY 2010 to FY 2014, the average percentage of complaints resolved following rejection of mediation was 36.9%. During FY 2014, this figure increased slightly above the average to 39.1%.



• **Formal Filing Rate¹⁵**

The chart below indicates the number of formal complaints filed in PDO has decreased from 309 in FY 2010 to 220 in FY 2014, representing a decrease of 28.8%. In addition, the formal complaint filing ratio has decreased from 57.8% in FY 2010 to 53.0% in FY 2014. CBP's FY 2014 filing rate of 53.0% is below the DHS rate of 58.7% and above the Federal sector rate of 45.9%.

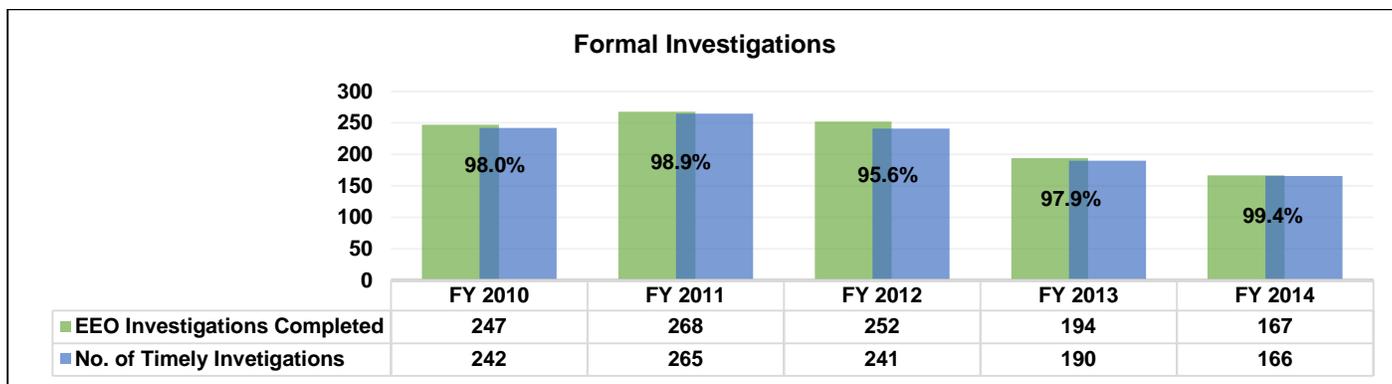


C. FY 2014 Formal EEO Complaint Processing Statistical Analysis

• **Formal Investigations Completed**

The chart below shows that between FY 2010 and FY 2014, PDO achieved the following outstanding results in the area of formal complaint investigations:

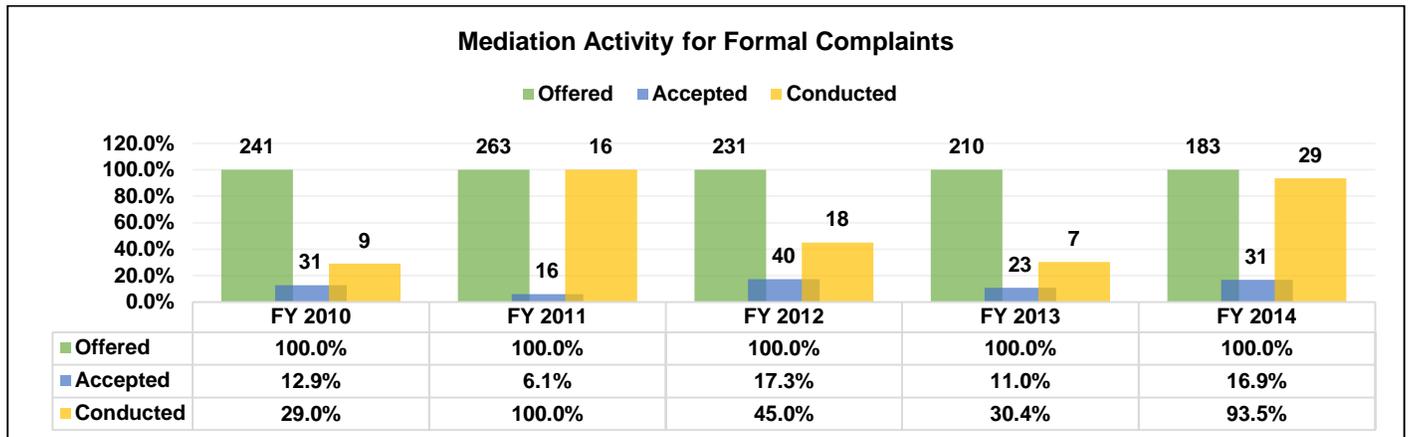
- ✓ The number of investigations completed within the regulatory timeframes¹⁶ increased from 98.0% to 99.4%, as compared to 59.4% for DHS, and 74.9% for the Federal sector.¹⁷



¹⁵ The Federal sector informal EEO claim figures are not available at this time; therefore, data from FY 2012 was used as a comparator.
¹⁶ Pursuant to 29 C.F.R. Part 1614 formal EEO complaints must be investigated with 180 calendar days from the date of filing or, in cases of amended complaints within 360 calendar days.
¹⁷ CBP completed 100% of their 166 investigations. A conflict case investigated by another DHS component was untimely and out of CBP's control.

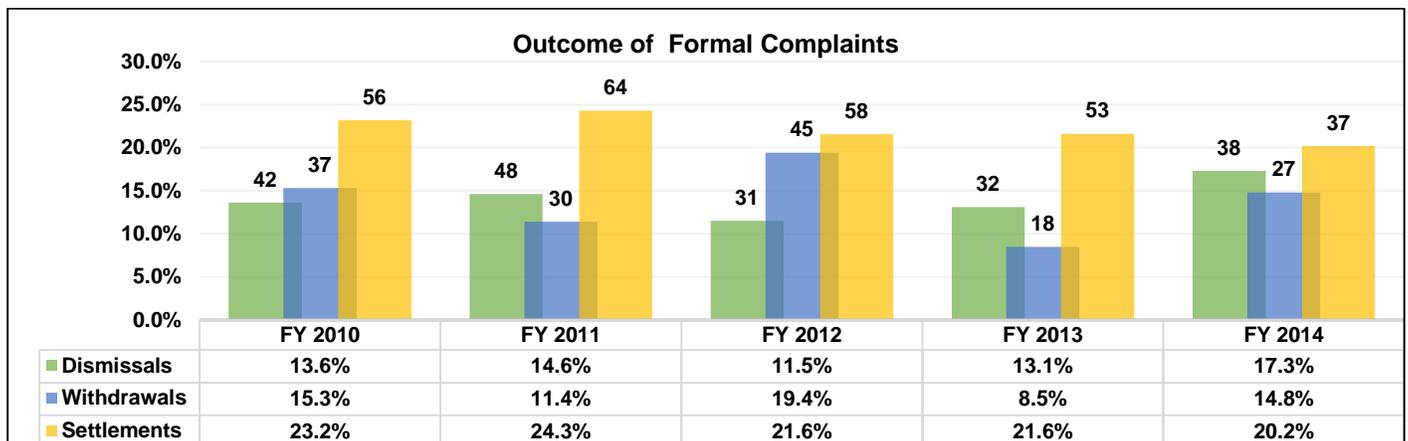
• **Mediation - Formal Complaints**

CBP offers mediation to all individuals who file formal EEO complaints that meet all jurisdictional requirements of 29 C.F.R. Part 1614.107 and are accepted for investigation. The table and chart below reveal that even though 100.0% of complainants were offered mediation, only 16.9% agreed to participate. This acceptance rate is 4.0% above the rate in FY 2010.



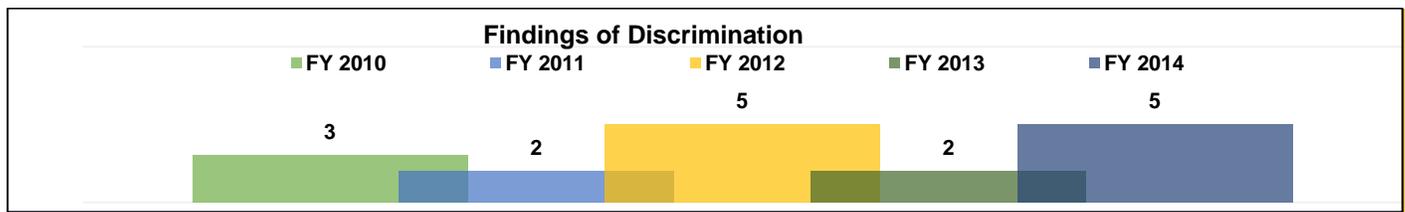
• **Dismissals and Settlements - Formal Complaints**

On average, CBP dismissed 14.0% of the formal complaints it received while DHS dismissed 10.3% and the Federal sector dismissed 22.2%. From FY 2010 to FY 2014, formal complaints dismissed by CBP on jurisdictional grounds increased from 13.6% to 17.3%, withdrawals of formal complaints decreased 3.3%, and settlements of formal complaints decreased by 12.9%.



• **Findings of Discrimination**

CBP had five findings of discrimination in FY 2014. Two of the five findings were issued by DHS CRCL without an EEOC AJ Hearing.



• **Formal Complaints**

The following table provides a list of the bases upon which individuals filed complaints of discrimination. The most frequently alleged basis of discrimination was “Reprisal.” The second most frequently alleged basis was “Sex (Male and Female).”

| Bases of Formal Complaints | | | | | |
|------------------------------------|---------|---------|---------|---------|---------|
| | FY 2010 | FY 2011 | FY 2012 | FY 2013 | FY 2014 |
| Reprisal | 190 | 281 | 117 | 111 | 109 |
| Sex (Male and Female) | 132 | 143 | 88 | 79 | 65 |
| Age | 131 | 132 | 89 | 74 | 46 |
| Race | 129 | 139 | 58 | 68 | 59 |
| Disability (Mental and Physical) | 113 | 134 | 60 | 47 | 49 |
| National Origin | 92 | 262 | 60 | 44 | 51 |
| Color | 44 | 28 | 19 | 13 | 14 |
| Religion | 22 | 33 | 15 | 10 | 11 |
| PDA (Pregnancy Discrimination Act) | -- | 3 | 3 | 2 | 2 |
| GINA (Genetic Information) | 0 | 1 | 0 | 2 | 1 |
| Equal Pay | N/A | N/A | N/A | 1 | 0 |

• **Formal Complaint Allegations**

The following table highlights the “Top Ten” issues most frequently alleged by complainants.

| Issues of Formal Complaints | | | | | |
|-------------------------------|---------|---------|---------|---------|---------|
| | FY 2010 | FY 2011 | FY 2012 | FY 2013 | FY 2014 |
| Non-Sexual Harassment | 166 | 113 | 89 | 87 | 92 |
| Promotion/Non-Selection | 105 | 55 | 55 | 48 | 40 |
| Assignment of Duties | 40 | 39 | 45 | 31 | 30 |
| Reprimand | 43 | 22 | 9 | 20 | 11 |
| Terms/Condition of Employment | 33 | 56 | 27 | 15 | 9 |
| Suspension | 28 | 23 | 15 | 14 | 14 |
| Reassigned - Denied | 14 | 12 | 9 | 12 | 8 |
| Sexual Harassment | 9 | 8 | 8 | 11 | 10 |
| Pay Including Overtime | 6 | 8 | 10 | 11 | 14 |
| Reasonable Accommodation | 18 | 28 | 14 | 10 | 10 |
| Training | 24 | 34 | 6 | 10 | 5 |
| Termination | 130 | 98 | 16 | 9 | 8 |
| Time and Attendance | 48 | 52 | 23 | 8 | 8 |
| Appointment/Hire | 15 | 21 | 7 | 8 | 9 |

X. Alternative Dispute Resolution (ADR) Program Accomplishments

A. ADR Program Accomplishments

During FY 2014, PDO's ADR accomplishments consisted of the following:

- Offered mediation to 100.0% of the individuals who requested EEO counseling and 100.0% of individuals whose claims were accepted for investigation.
- Increased the informal complaint mediation acceptance rate by 2.3%, as compared to FY 2013, resulting in an 81.4% participation rate (based on mediation acceptance rate).
- Conducted mediation in 52.4% of informal complaints and 93.0% of formal complaints (based on acceptance rate). The formal complaint rate increased by 64.6% over FY 2013.
- Coordinated and implemented mediator recruitment drive and selections, resulting in an increase in the number of collateral duty mediators by more than 100.0% as compared to FY 2013; the cadre rose from 23 to 57 trained mediators. Twenty-four (24) new collateral duty from across the country were trained, including four hours of Basic EEO Awareness training provided by the ADR Program Coordinator. Mediators went on to complete on-the-job training (co-mediation) in order to complete their certification process. This initiative enables PDO to engage in more face-to-face mediation sessions.
- Monthly mediator training conferences were held in order to promote confidence, develop/hone mediation skills, and to provide a forum to share best practices. The total number of mediators trained at all nine conferences combined is 182, which represents a 65.0% increase over FY 2013. Collateral duty mediator attendance at monthly conferences increased by 59.6% at monthly conferences between FY 2013 and FY 2014. On average, 22 participants were in attendance at conferences.
- Developed ADR Handbook designed for all users of the Mediation program which features:
 - ✓ The History of ADR;
 - ✓ CBP Model Standards of Conduct for Mediators adapted from documents published by the American Arbitration Association, the American Bar Association Dispute Resolution Section, and the Association for Conflict Resolution;
 - ✓ Mediator Selection and Recertification process and
 - ✓ Operating procedures for PDO staff and CBP Mediators.

XI. Civil Rights and Civil Liberties Program Management

A. Language Access for Persons with Limited English Proficiency

CBP's Language Access Plan implements the DHS Language Access Policy and establishes a system within CBP to implement Executive Order 13166 - [*Improving Access to Services for Persons with Limited English Proficiency \(LEP\)*](#), which requires that each Federal department and agency "examine the services it provides to LEP persons and develop and implement a system by which LEP persons have 'meaningful access' to those services without unduly burdening the fundamental mission of the agency." In addition to describing CBP's current language access activities, this plan includes steps to improve and increase language services for LEP individuals in operations, services, activities, and programs across CBP. CBP continues to implement the Plan objectives through the CBP LEP Action Plan Implementation Committee formed to provide opportunities to share best practices and leverage resources across CBP. The workgroup has completed the following:

- Notified all CBP employees of the agency's commitment to communicate effectively with individuals, including those with limited English proficiency, across our many missions and functions, and the posting of CBP's Draft LEP Plan for comment from interested stakeholders including LEP persons and their representative organizations.
- Drafted Self-Inspection Program assessment questions to monitor compliance with the LEP Plan.
- Ensured that procedures are in place for the provision of interpretation and translation services to individuals encountered at and between the ports of entry.
- Obtained and made available the Civil Right and Civil Liberties I Speak language identification posters to be used nationwide at operational locations to assist officers and agents in identifying languages spoken by LEP members of the trade, travelling public, and/or those apprehended illegally entering the country.

B. Managing Civil Rights and Civil Liberties Claims

Civil liberties are the rights enumerated in the U.S. Constitution, Federal statutes, and regulations, including freedom from discrimination on the grounds of race, sex, religion, national origin, age, disability, or genetic information, freedom of speech, free exercise of religion, due process of law, appropriate conditions of confinement, and protection from excessive force, unreasonable searches and seizures, and unlawful intrusions into personal privacy.

C. CBP Civil Rights and Civil Liberties Policy

CBP shall treat all individuals in a non-discriminatory manner, with respect to all forms of protected status under federal law, regulation, Executive Order, or policy, with full

respect for individual rights including equality under the law, due process, freedom of expression and religion, freedom from excessive force, unreasonable searches and seizures, and unlawful intrusions into personal privacy. To exemplify these commitments, CBP will maintain an efficient and effective external CRCL complaint-processing program focused on gathering all the relevant facts and evidence necessary to resolve complaints. CBP shall adhere to the core premise that civil rights and civil liberties protection and elimination of unlawful profiling is not only an ethical and legal imperative but also a practical necessity to maintaining and enhancing the public's level of trust in federal law enforcement.

In addition, CBP follows the DHS policy, which prohibits the consideration of race or ethnicity in the application of CBP law enforcement activities, which states that:

"Racial profiling" is the invidious use of race or ethnicity as a criterion in conducting stops, searches, and other law enforcement, investigation, or screening activities. It is premised on the erroneous assumption that any particular individual of one race or ethnicity is more likely to engage in misconduct than any particular individual of another race or ethnicity. DHS has explicitly adopted the Department of Justice's (DOJ's) "Guidance Regarding the Use of Race by Federal Law Enforcement Agencies," issued in June of 2003. It is the policy of DHS to prohibit the consideration of race or ethnicity in our daily law enforcement and screening activities in all but the most exceptional instances, as defined in the DOJ Guidance. DHS personnel may use race or ethnicity only when a compelling governmental interest is present, and only in a way narrowly tailored to meet that compelling interest. Of course, race or ethnicity-based information that is specific to particular suspects or incidents, or ongoing criminal activities, schemes or enterprises, may be considered, as stated in the DOJ Guidance.

Except as noted below, it is DHS policy, although not required by the Constitution, that tools, policies, directives, and rules in law enforcement and security settings that consider, as an investigative or screening criterion, an individual's simple connection to a particular country, by birth or citizenship, should be reserved for situations in which such consideration is based on an assessment of intelligence and risk, and in which alternatives do not meet security needs, and such consideration should remain in place only as long as necessary. These self-imposed limits, however, do not apply to antiterrorism, immigration, or customs activities in which nationality is expressly relevant to the administration or enforcement of a statute, regulation, or Executive Order, or in individualized discretionary use of nationality as a screening, investigation, or enforcement factor.

PDO is responsible for coordinating with the Department of Homeland Security's Office of Civil Rights and Civil Liberties in the investigation of claims alleging violations of

these rights in activities in connection with CBP's mission, for responding to CRCL recommendations resulting from its investigation of such claims, and for overseeing the implementation of implementation of accepted recommendations.

D. PDO Civil Rights and Civil Liberties Responsibilities

- Establishing policies, implementing guidelines, standards, and programs necessary to ensure compliance with policy and guidance issued by the DHS/CRCL.
- Advising the Commissioner and other senior CBP leaders, as appropriate, on issues that may adversely impact operations or require funding to implement.
- Ensuring that DHS/CRCL receives requested information related to the implementation of guidelines, standards, and programs within established timeframes.
- Leading CBP's efforts to gather all information necessary, ensuring a free flow of information between CBP and DHS/CRCL to facilitate the timely and thorough completion of CRCL investigations. In particular, PDO will attempt to ensure that reports of investigation are returned to DHS/CRCL within 180 days.
- Arranging briefings, when necessary, to respond to DHS/CRCL's requests for information.
- Ensuring the implementation, when appropriate, of recommendations made in memoranda issued by DHS/CRCL to senior CBP leadership.
- Providing notification to DHS/CRCL of actions taken or reason(s) for non-implementation of DHS/CRCL recommendations.

E. FY 2014 Civil Rights and Civil Liberties Activities

The CRCL Program addressed the following civil liberties issues:

- Treatment of Unaccompanied Alien Children (UAC) during recent influx at the Southwest Border.
- Notification to DHS/CRCL of all non-employee deaths in custody and/or as a result of enforcement activity.
- Handling of internal smugglers at on-site contracted medical facilities.
- Handling of credible fear statements from detainees.
- Establishing procedures for the recording of all tips resulting in any enforcement activity, including tips that come to USBP by means other than through an established tip line ("informal tips").
- Identifying locations of life-saving equipment.
- Communication with CRCL on background, need, and process for OBP activities involved in Checkpoint and Transit Hub checks.

The CRCL Program accomplished the following key initiatives:

- Revising CRCL Directive 2130-021, establishing the responsibilities of CBP offices with respect to CRCL claims.

- Developed and issued a CBP policy statement on Nondiscrimination in Law Enforcement Activities and all other Administered Programs.
- Developed and delivered a muster module for all enforcement personnel on anti-profiling in security screen and enforcement activities.
- Disseminated and ensured that the DHS anti-profiling policy was included in curriculum at the training academies.
- Developed and posted anti-profiling posters at the training academies.
- Developed civil rights and civil liberties training for completion by new supervisors during Supervisory Leadership Training and IDS slides shown by OFO and OBP.

F. Civil Rights and Civil Liberties Referrals

During FY 2014, CBP received 136 complaints from CRCL. A total of 89 complaints were closed during the same period. As of the end of FY 2014, there were 235 complaints open, either under investigation or otherwise not yet closed by DHS/CRCL.

XII. Prison Rape Elimination Act (PREA) Implementation

On March 7, 2014, DHS issued regulations setting standards to prevent, detect, and respond to sexual abuse and assault in DHS confinement facilities. Sexual violence, against any victim, is an assault on human dignity and an affront to American values. The standards support the Prison Rape Elimination Act (PREA) of 2003.

Thus, on May 6, 2014, CBP Commissioner, R. Gil Kerlikowske issued *CBP's Policy on Zero Tolerance of Sexual Abuse*. Specifically, the policy states that CBP has a zero tolerance policy prohibiting all forms of sexual abuse of individuals in CBP custody, including in detention facilities, during transport, and during processing. CBP is committed to protecting the safety of individuals in CBP custody, and it is CBP policy to provide effective safeguards against sexual abuse for individuals in CBP custody. This policy prohibits sexual abuse and assault of a detainee by another detainee; sexual abuse and assault of a detainee by agents, officers, other CBP staff members, contractors, and volunteers; and retaliation against any person, including a detainee, who reports, complains about, or participates in an investigation of sexual abuse or assault. To comply with the PREA Standards, PDO has established an upper-level, agency-wide position of Prevention of Sexual Assault Coordinator (PSA Coordinator).

PDO has also accomplished the following:

- Collaborated with the Office of Field Operations, Office of Border Patrol, and the Office of Internal Affairs to draft PREA Standards Memos.
- Collaborated with the Office of Training and Development to draft the basic PREA Training Module Course for the CBP workforce that may come into contact with detainees, which is in the final stages of completion.
- Collaborated with the Office of Administration and drafted a new clause to include in all contracts for persons contracted to provide services to CBP to comply with the PREA standards, which is in the final stage of completion.
- Drafted Self-Inspection Program worksheets for use during the FY 2015 Self Inspection Program Cycle.
- Prepared a hand-out for CBP personnel to provide to individuals who may qualify for U-non-immigrant visa status.
- Finalized the PREA poster and IDS messaging to publicize CBP's zero tolerance policy regarding sexual abuse and assault with multiple ways for detainees to report sexual abuse and assault.

XIII. Policy Planning and Mission Support Division

A. FY 2014 Contributions

PDO's Policy Planning and Mission Support Division provide invaluable support to PDO various program areas. In fact, our success would not be possible without the contribution of the outstanding members of this Division. The table below highlights the activities and contributions of the Headquarters Mission Support Division to PDO's FY 2014 results:

| FY 2014 Contributions | |
|---|---|
| MAJOR FUNCTIONAL AREAS | |
| Telework Agreements Approved | 30 |
| Child Care Subsidy Program | 0 |
| Volunteer Program Liaison | 2 |
| TRAINING | |
| Individual Development Plans | Number of Plans Issued: 45 |
| PDO Training for Diversity Staff | 8 |
| PDO Training for FOIA Staff | 8 |
| PDO Training for Privacy Staff | 8 |
| PDO Training for Mission Support Staff | 60 hrs. |
| CBP Mandatory Training Requirements | 8 |
| Hours of Training Received by PDO Staff | 3 |
| ADMINISTRATION | |
| Property Inventory | 100% - all items accounted for and documented |
| Inventory of Badge and Credentials | 100% - all items accounted for and documented |
| Travel Card Issued | 0 |
| Workers Compensation (CA-1 Forms Received) | 1 person filed |
| Court Reporting Cost | PDO did not receive a budget in FY 2014 |
| EMERGENCY PREPAREDNESS/COOP | |
| Conducted Readiness Test | 1 |
| Emergency Contact Forms | 100% |
| Web Tele Updates | 100% |
| HQ Emergency Evacuation Procedures | All locations |
| TECHNOLOGY/AWARDS/NOTICES | |
| CPRO Access Requests | 10 approved |
| PDO Quarterly E-Newsletter | 1 |
| C1 Bi-Weekly Highlight Report | 24 |
| PDO Annual Report | 1 |
| CBP Central Postings | 13 |
| Leave and Earning Statement Messages Notices | 20 |
| Certificates and Awards Issued | 98 |
| Printing and Graphics Requests | 2 |

| | |
|---|-------|
| SIP Worksheets Completed | 14 |
| SIP Worksheets Created | 3 |
| OFFICE SUPPORT | |
| Incoming Correspondence | 2,002 |
| Outgoing Correspondence | 613 |
| Executive Correspondence | 78 |
| Taskings | 213 |
| PDO Taskings | 48 |
| Log of Incoming Calls | 2,712 |
| New Employee Orientation and In-Processing | 23 |
| Employee Out-Processing | 18 |

B. PDO Self-Inspection Program Results

PDO uses CBP's internal the Self-Inspection Program (SIP) to audit CBP's compliance in meeting the parameters identified in MD-715, which is prepared pursuant to EEOC's authority under Section 717 of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e-16; Reorganization Plan No. 1 of 1978, issued pursuant to 5 U.S.C. § 901 et seq.; Executive Order 11748; and Section 501 of the Rehabilitation Act of 1973, as amended by Pub. L. 99-506, 100 Stat. 1807, October 21, 1986. The overriding objective of this Directive is to ensure that all employees and applicants for employment enjoy equality of opportunity in the federal workplace regardless of race, sex, national origin, color, religion, disability or reprisal for engaging in prior protected activity.

During Cycle 2014, PDO included a total of ten self-inspection worksheets, which were administered 372 times and included a total of 37 questions in the combined worksheets. The worksheets were implemented in Headquarters and field office locations, which conducted self-assessment activities performing, certifying, and/or approving the results of office self-inspections.

The SIP Cycle 2014 PDO issued self-inspection results revealed overall high levels of compliance in executing many functions supporting the CBP mission. Of all the worksheets circulated by PDO, only the Freedom of Information and Privacy worksheet revealed compliance levels below a 90 percent threshold for corrective action.

XIV. Closing Remarks



In closing, thank you for taking the time to read PDO's FY 2014 Annual Report, and please appreciate that our success is only possible through the dedication and commitment of all CBP employees. I appreciate your tireless efforts to ensure the safety of our great Nation while striving to create an ideal working environment. In FY 2015, we look forward to continuing our efforts to make CBP the best place to work in the world and a sought after employer of choice in the law enforcement community. We will continue to build upon our strengths in the spirit of "One CBP" by growing our diversity and inclusion programs to sustain a workplace culture in which all Americans are welcomed and given an opportunity to excel. We will continue to celebrate the differences and uniqueness that each person brings to the CBP family, because our true strength is embroidered on a fabric which reflects many faces, many colors, individual beliefs and cultures, woven together by a common thread of vigilance, integrity, and commitment to public service while adhering to our values as Americans.

Moving forward, as we continue to improve upon our business operations and the services provided to all CBP employees, PDO welcomes your comments and recommendations on how we can further our commitment to diversity and inclusion and our commitment to building the best possible organization to protect the American people.

For more information about CBP's privacy, FOIA, EEO, diversity and inclusion, and civil rights/civil liberties programs, please visit us at [PDO's Intranet web site](#).

Yours truly,

Franklin C. Jones
Executive Director
Privacy and Diversity Office



XV. Acronyms

CAP - Computer/Electronic Accommodations Program
CBP - U.S. Customs and Border Protection
OCC - Office of Chief Counsel
CLF - Civilian Labor Force
CRCL - Civil Rights and Civil Liberties
DCR - Diversity and Civil Rights
DHS - Department of Homeland Security
DIMC - Diversity and Inclusion Management Council
DIPC - Diversity and Inclusion Program Committees
DOD - Department of Defense
DOJ - Department of Justice
EEO - Equal Employment Opportunity
EEOC - Equal Employment Opportunity Commission
ERI - Ethnicity and Race Indicator
FISMA - Federal Information Security Management Act
FOIA - Freedom of Information Act
FY - Fiscal Year
IA - Office of Internal Affairs
IT - Information Technology
JAN - Job Accommodation Network
MD-715 - Management Directive 715
NORTF - Notice of Right to File a Discrimination Complaint
OAST - DHS Office of Accessible Systems and Technology
OC - Office of the Commissioner
OIT - Office of Information and Technology
PDO - Privacy and Diversity Office
PIA - Privacy Impact Assessments
PII - Personal Identifiable Information
PREA - Prison Rape Elimination Act
PSA Coordinator - Prevention of Sexual Assault Coordinator
SIP - Self Inspection Program
SLT - Supervisory Leadership Training
SORN - System of Records Notices
UAC - Unaccompanied Alien Children

U.S. Customs and Border Protection
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