



December 2020

# INTELLIGENCE COMMUNITY

## Additional Actions Needed to Strengthen Workforce Diversity Planning and Oversight

# GAO Highlights

Highlights of [GAO-21-83](#), a report to congressional committees

## Why GAO Did This Study

The *2019 National Intelligence Strategy* states that the IC will recruit, develop, and retain a diverse, inclusive, and expert workforce to enable mission success. ODNI reports that the IC is taking steps to increase the representation of diverse groups, such as issuing new strategies to enhance workforce planning. However, barriers to establishing a diverse workforce exist across the IC, according to an ODNI 2017 analysis.

GAO was asked to review the IC's progress in enhancing workforce diversity. This report (1) summarizes ODNI annual demographic reports on the proportion of women, racial or ethnic minorities, and persons with disabilities; and assesses the extent to which (2) IC elements report taking steps to address leading practices for managing workforce diversity and to identify potential barriers to maintaining a diverse workforce; and (3) ODNI is addressing leading practices for coordinating IC workforce diversity initiatives. GAO reviewed IC-wide and IC element specific policies and guidance; interviewed ODNI, and other IC officials; and administered a questionnaire to all 17 IC elements to obtain information on diversity strategies and challenges.

## What GAO Recommends

GAO is making seven recommendations, including that the Director of National Intelligence issue or update guidance to ensure IC elements maintain diversity strategic plans, assess and take steps to eliminate barriers to diversity, and establish implementation objectives and timeframes to hold IC elements accountable. ODNI agreed with the recommendations.

View [GAO-21-83](#). For more information, contact Brian M. Mazanec at (202) 512-5130 or [mazanecb@gao.gov](mailto:mazanecb@gao.gov).

December 2020

## INTELLIGENCE COMMUNITY

### Additional Actions Needed to Strengthen Workforce Diversity Planning and Oversight

## What GAO Found

The Office of the Director of National Intelligence (ODNI) reported that the representation of some demographic groups within the Intelligence Community (IC) workforce increased from fiscal years 2011 through 2019—the latest available data. Over this period, the proportion of women, racial or ethnic minorities, and persons with disabilities changed by .7, 3.3, and 6.2 percentage points, respectively. However, the representation of women, racial or ethnic minorities, and persons with disabilities remained below comparable benchmarks and declined among higher ranks in fiscal year 2019.

IC elements report taking steps to address leading practices for managing workforce diversity, but report gaps in diversity planning. GAO found that most IC elements report taking steps to address seven of nine leading practices for diversity management. For the remaining two leading practices—strategic planning and measurement—most elements report taking one or no steps.

**Number of Intelligence Community (IC) Elements and the Steps They Report Taking to Implement Leading Practices for Workforce Diversity Management, as of August 2020**

GAO leading practices	Number of IC elements that report taking steps
Leadership commitment	17 of 17 IC elements report taking multiple steps
Recruitment	14 of 17 IC elements report taking multiple steps, and three IC elements report taking one step
Employee involvement	14 of 17 IC elements report taking multiple steps, two IC elements report taking one step, and one IC element reports taking no step
Diversity training	14 of 17 IC elements report taking multiple steps, and three IC elements report taking one step
Performance	12 of 17 IC elements linked diversity management with enhanced performance while five IC elements did not
Succession planning	9 of 17 IC elements report taking multiple steps, and eight IC elements report taking one step
Accountability	9 of 17 IC elements report taking multiple steps, seven IC elements report taking one step, and one IC element reports taking no steps
Strategic planning	3 of 17 IC elements have current and complete strategic plans
Measurement	6 of 17 IC elements have diversity-related performance measures

Source: GAO analysis of IC element documents and GAO leading practices for diversity management. | GAO-21-83

Further, while all IC elements report having a process to identify barriers to diversity, nine IC elements report not completing required barrier assessments. Without fully implementing leading practices for managing workforce diversity and conducting routine barrier assessments, the IC may miss opportunities to develop effective and efficient diversity policies and programs.

ODNI's Office of Intelligence Community Equal Employment Opportunity and Diversity (IC EEOD) is meeting seven of eight leading practices for enhancing and sustaining the coordination of diversity initiatives across the 17 IC elements. However, IC EEOD partially met the practice to reinforce agency accountability. Specifically, IC EEOD has not established IC-wide implementation objectives and timeframes to demonstrate progress. As a result, IC EEOD risks not holding IC elements accountable for enhancing workforce diversity.

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## Abbreviations

DOD	U.S. Department of Defense
EEOC	U.S. Equal Employment Opportunity Commission
IC	Intelligence Community
IC EEOD	Office of Intelligence Community Equal Employment Opportunity and Diversity
MD-715	Management Directive 715
ODNI	Office of the Director of National Intelligence
OPM	Office of Personnel Management
USD (I&S)	Under Secretary of Defense for Intelligence and Security

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December 17, 2020

The Honorable Marco Rubio  
Acting Chairman  
The Honorable Mark R. Warner  
Vice Chairman  
Select Committee on Intelligence  
United States Senate

The Honorable Adam Schiff  
Chairman  
The Honorable Devin Nunes  
Ranking Member  
Permanent Select Committee on Intelligence  
House of Representatives

The 2019 *National Intelligence Strategy* states that the Intelligence Community (IC) will recruit, develop, and retain a diverse, inclusive, and expert workforce to address enduring and emerging requirements and enable mission success.<sup>1</sup> Further, the IC's *Equal Employment Opportunity and Diversity Enterprise Strategy* (hereafter called the *Enterprise Strategy*) states that the IC is committed to developing a diverse workforce whose dedication to the mission transcends race, color, religion, age, sexual orientation, national origin, parental status, gender identity, and sex to ensure all staff are welcomed and celebrated.<sup>2</sup> To guide an enterprise-wide commitment to a more diverse and inclusive environment, the *Enterprise Strategy* identifies IC-wide goals and

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<sup>1</sup>Office of the Director of National Intelligence, *National Intelligence Strategy of the United States of America* (2019).

<sup>2</sup>Office of the Director of National Intelligence, *Intelligence Community Equal Employment Opportunity and Diversity Enterprise Strategy* (2015-2020).

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objectives to ensure that the IC is collectively improving the recruitment, hiring, and retention of a diverse workforce.<sup>3</sup>

However, recent analysis shows that disparities and challenges for many groups still persist. For example, in a 2017 assessment of IC-wide diversity challenges, the Office of the Director of National Intelligence's (ODNI) Office of Intelligence Community Equal Employment Opportunity and Diversity (IC EEOD) found systemic diversity challenges within organizational leadership, organizational culture, recruitment and selection practices, advancement determinations, work and life integration, and reasonable accommodations.<sup>4</sup>

We were asked to review the IC's progress in enhancing workforce diversity. This report (1) summarizes analyses from ODNI annual demographic reports on the proportion of women, racial or ethnic minorities, and persons with disabilities within the IC's workforce, (2) assesses the extent to which IC elements report taking steps to address leading practices for managing workforce diversity and to identify potential barriers to maintaining a diverse workforce, and (3) assesses the extent to which ODNI is addressing leading practices for coordinating IC workforce diversity initiatives.

For objective one, we summarized unclassified information prepared by IC EEOD and reported by ODNI detailing aggregated demographic trends for fiscal years 2011 through 2019, which was the latest data available as of October 2020. We were unable to analyze demographic trend data for each IC element because ODNI's demographic reports provide aggregated data. Within our summary of ODNI's annual demographic reports, we provide an overview of the IC's workforce demographics with regard to women, racial or ethnic minorities, and persons with disabilities,

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<sup>3</sup>Office of the Director of National Intelligence, *National Intelligence Strategy of the United States of America* (2019). The strategy defines diversity as individual attributes that include, but are not limited to, characteristics such as national origin, language, race, color, mental or physical disability, ethnicity, sex, age, religion, sexual orientation, gender identity or expression, socioeconomic status, veteran status, and family structure. For the purposes of this report, diversity refers to the inclusion of women, racial or ethnic minorities, and persons with disabilities within the Intelligence Community workforce. Further, racial or ethnic minorities include employees who identify as African-American, Hispanic, Asian, American Indian, Alaskan Native, Native Hawaiian Pacific Islander, or two or more races.

<sup>4</sup>IC Equal Employment Opportunity and Diversity Office, *Diversity and Inclusion: Examining Workforce Concerns Within the Intelligence Community* (January 2017).

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among other information. We compared the reported demographic data to relevant benchmarks, such as the federal workforce and civilian labor force, which are routinely used by federal agencies to assess the representation of diverse demographic groups within their workforce, to determine whether the IC maintains proportional representation.<sup>5</sup> We also summarized ODNI's analyses of aggregated data in reports from fiscal years 2015 through 2019 that detailed the representation of women, racial or ethnic minorities, and persons with disabilities across different pay grades to determine how, if at all, their representation changed across pay grades from fiscal year 2011 through 2019.<sup>6</sup> Because ODNI does not have a central data repository of personnel records across the IC, IC EEOD states that it conducts an annual data call to each IC element, which then queries their individual data systems to provide responses based on a common set of requirements.<sup>7</sup> Analyses presented by ODNI and summarized in this report do not include estimates of potential error caused by these limitations, and therefore should be interpreted with caution, especially when examining trends among small populations. We initially planned on analyzing data from all 17 IC elements detailing their individual demographic trends from 2013 through 2018, which was the latest data available at the time we began this review, and analyzing the likelihood of hiring, promotion, and retention for certain demographic groups within select IC elements. However, due to impacts to government operations related to the Coronavirus Disease

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<sup>5</sup>Benchmarking helps define specific reference points for setting goals for improving performance. It leads an organization to compare the performance of its processes and the way the processes are conducted with either (1) internal organizational pockets of excellence or (2) relevant peer organizations to obtain ideas for improvement. See GAO, *Managing for Results: Critical Actions for Managing Performance*, [GAO/T-GGD/AIMD-95-187](#) (Washington, D.C.: June 20, 1995). Relevant benchmarks include the federal workforce and civilian labor force. The federal workforce and civilian labor force data are derived from the Office of Personnel Management's (OPM) most recent Federal Equal Opportunity Recruitment Program Report, which was issued in 2017.

<sup>6</sup>This data was subject to the Office of the Director of National Intelligence's quality assurance process, but may be subject to collection and measurement error.

<sup>7</sup>IC EEOD states it has made efforts to standardize the data they receive across IC elements through quality control procedures. However, they also report continuing limitations of the aggregate data underlying their analyses due to differences among agencies in the size, complexity, and maturity of personnel data holdings. For example, while IC EEOD provides standard definitions for data variables, IC elements may not store, categorize, and sort data in the same way for all personnel actions. Other challenges include (but are not limited to) difficulties tracking IC members who are co-located with non-IC members or are detailed between agencies and missing data for some variables.



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2019, we were not able to assess all of the detailed workforce data, including classified data underlying ODNI's annual demographic reports.

For objective two, we reviewed enterprise-wide and IC element-specific workforce diversity plans and strategies and compared them to leading practices for diversity management to assess whether IC elements have reported taking steps consistent with key leading practices in diversity management.<sup>8</sup> We also considered relevant federal internal control standards, the *National Intelligence Strategy*, and the *Enterprise Strategy* as part of our assessment.<sup>9</sup> We determined that the risk assessment component of internal controls was significant to this objective, along with the underlying principle that management defines objectives in specific terms so they are understood at all levels of the entity. We reviewed available IC element documentation on policies and procedures for strategic human capital planning and compared this documentation with this principle to identify any gaps. We developed a questionnaire based on the leading practices, among other things. We tested the clarity and readability of the questionnaire with officials from three IC elements. We administered the questionnaire to all 17 IC elements and obtained responses and information from each element on current plans, strategies, challenges, and steps taken to address identified challenges. However, we did not assess the quality of implementation or direct impacts of these reported steps. We ensured the leading practices for diversity management were relevant and applicable by discussing our criteria with senior ODNI IC EEOD and Department of Defense (DOD)

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<sup>8</sup>GAO, *Diversity Management: Expert-Identified Practices and Agency Examples*, [GAO-05-90](#) (Washington, D.C.: Jan. 14, 2005). In 2005, we reported on these practices that we developed based on completing a literature review, and selecting a list of recognized diversity experts based on interviews with federal officials and others. We gathered views on leading practices in a data collection instrument and reviewed the responses of these experts, counting the number of times an expert cited a practice.

<sup>9</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014). Office of the Director of National Intelligence, *The National Intelligence Strategy of the United States of America* (2019). Intelligence Community Equal Employment Opportunity, *Intelligence Community Enterprise Strategy* (2015-2020).

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officials.<sup>10</sup> We provided this criteria to each of the IC elements and then provided our preliminary element-level assessment of the steps IC elements report taking to meet the criteria as needed. We also reviewed Management Directive 715 (MD-715) submissions from several IC elements to better understand their diversity plans, policies, and initiatives.<sup>11</sup> We interviewed officials from across the IC and other federal agencies, including the U.S. Equal Employment Opportunity Commission (EEOC) and U.S. Office of Personnel Management (OPM) to obtain their perspective on ways to efficiently and effectively manage workforce diversity challenges.

For objective three, we reviewed ODNI IC EEOD guidance for coordinating workforce diversity policies, programs, and initiatives across the IC, and reviewed documentation detailing ODNI activities conducted to enhance IC-wide recruitment, hiring, promotion and retention of a diverse workforce. Further, the questionnaire we administered to all 17 IC elements included questions requesting their perspective on ODNI's coordination efforts from fiscal years 2017 through 2019. We compared this information to key practices for enhancing and sustaining collaboration among federal agencies to determine whether ODNI is taking steps consistent with key leading practices for enhancing the

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<sup>10</sup>These leading practices have also been applied to assess various recent federal diversity management efforts, including assessments of the Consumer Financial Protection Bureau and the National Institutes of Health. See GAO, *Consumer Financial Protection Bureau: Additional Actions Needed to Support a Fair and Inclusive Workplace*, [GAO-16-62](#) (Washington, D.C.: May 19, 2016) and GAO, *NIH Research: Action Needed to Ensure Workforce Diversity Strategic Goals Are Achieved*, [GAO-18-545](#) (Washington, D.C.: Aug. 10, 2018).

<sup>11</sup>The EEOC requires all executive agencies to complete an annual report, commonly referred to as the MD-715, which provides the status of activities undertaken pursuant to the agency's equal employment opportunity program and affirmative action obligations under applicable laws.

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coordination of IC diversity programs and policies.<sup>12</sup> We then interviewed ODNI officials to discuss the information we collected and our subsequent analysis.

We conducted this performance audit from July 2019 to December 2020 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

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### Diversity-Related Laws, Regulations, and Guidance

Title VII of the Civil Rights Act of 1964 and Section 501 of the Rehabilitation Act of 1973 mandate that all federal personnel decisions be made without discrimination on the basis of race, color, religion, sex, national origin, reprisal, or disability and require that agencies establish a program of equal employment opportunity for all federal employees and applicants.<sup>13</sup> By law, the federal government's recruitment policies should endeavor to achieve a workforce from all segments of society, while avoiding discrimination for or against any employee or applicant on the basis of race, color, religion, sex (including pregnancy, transgender

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<sup>12</sup>GAO, *Results Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies*. [GAO-06-15](#) (Washington, D.C.: Oct. 21, 2005). GAO reviewed academic literature and prior GAO and Congressional Research Service reports to identify key practices that can help enhance and sustain collaboration as well as federal agency collaborative efforts that illustrate these practices. In addition, GAO interviewed experts in coordination, collaboration, partnerships, and networks from the National Academy of Public Administration, the IBM Center for The Business of Government, and the University of California, Berkeley. The set of practices are consistent with requirements under the Government Performance and Results Act of 1993. However, we do not consider our categorization of the practices for collaborative efforts to be definitive and recognize that alternative categorizations of practices could be developed and additional practices included.

<sup>13</sup>Title VII of the Civil Rights Act of 1964, Pub. L. No. 88-352 (1964), as amended, codified at 42 U.S.C. § 2000e et seq., and Section 501 of the Rehabilitation Act of 1973, Pub. L. No. 93-112 (1973), as amended, codified at 29 U.S.C. § 791.

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status, and sexual orientation), national origin, age, disability, or any other prohibited basis.<sup>14</sup>

Issued in 2011, Executive Order 13583 directs all executive departments and agencies to develop and implement a more comprehensive, integrated, and strategic focus on diversity and inclusion as a key component of their respective human resources strategies. Further, this approach should include a continuing effort to identify and adopt best practices to promote diversity and to remove any barriers to equal employment opportunity, consistent with merit system principles and applicable law.<sup>15</sup> As of September 2020, Executive Order 13950 directs executive agencies and other entities to comply with additional diversity training requirements, including submitting a report on fiscal year 2020 funding to the Office of Management and Budget, among other things.<sup>16</sup>

Federal law, regulations, executive orders, and management directives include provisions aimed at improving federal employment opportunities for persons with disabilities.<sup>17</sup> According to law, federal agencies are required to take steps to provide equal opportunity to qualified individuals with disabilities in all aspects of federal employment.<sup>18</sup> Further, federal

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<sup>14</sup>See, for example, 5 U.S.C. §§ 2301(b)(1) and 2302(b).

<sup>15</sup>Exec. Order No. 13583, *Establishing a Coordinated Government-Wide Initiative to Promote Diversity and Inclusion in the Federal Workforce*, 76 Fed. Reg. 52847 (Aug. 23, 2011). According to DOD guidance, a best practice is defined as a validated method or procedure which has consistently shown results superior to those achieved with other means, and appears to be worthy of replication.

<sup>16</sup>Exec. Order No. 13950, *Combating Race and Sex Stereotyping*, 85 Fed. Reg. 60683 (Sept. 28, 2020).

<sup>17</sup>According to the Americans with Disabilities Act of 1990, Pub. L. No. 101-336 (1990), and codified, as amended, at 42 U.S.C. § 12102, the term disability means a physical or mental impairment that substantially limits one or more of the major life activities; a record of such impairment; or being regarded as having such an impairment. Under the Americans with Disabilities Act, as amended, or the Rehabilitation Act, as amended, an employer or other covered entity is prohibited from treating a qualified individual with a disability who is an employee or applicant unfavorably because he or she has a disability. Disability discrimination also occurs when a covered employer or other entity treats an applicant or employee less favorably because he or she has a history of a disability (such as a past major depressive episode) or because he or she is believed to have a physical or mental impairment that is not transitory (lasting or expected to last six months or less) and minor (even if he or she does not have such an impairment).

<sup>18</sup>Section 501 of the Rehabilitation Act of 1973, as amended, is codified at 29 U.S.C. § 791.

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agencies are required to develop affirmative action program plans for hiring, placement, and advancement of people with disabilities, and ensure employment nondiscrimination and the provision of reasonable accommodations.<sup>19</sup> In addition, Executive Order 13548 emphasizes that as the nation's largest employer, the federal government must become a model for the employment of individuals with disabilities.<sup>20</sup> The EEOC's 2017 regulations also require agencies to take specific steps to increase the employment of individuals with disabilities. For example, agencies are expected to commit to the goal of having no less than 12 percent of their workforce in all grades comprised of employees with disabilities and at least 2 percent of an agency's workforce to be comprised of employees with targeted disabilities, which include, for example, developmental or intellectual disabilities, traumatic brain injuries, deafness or serious difficulty hearing, blindness or serious difficulty seeing even when wearing glasses, epilepsy or other seizure disorders, and partial or complete paralysis, among others.<sup>21</sup>

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## Oversight of Workforce Diversity in the Federal Government

OPM serves as the chief human resources agency and personnel policy manager for the federal government. The Director of OPM is responsible for, among other things, executing, administering, and enforcing the civil service laws, rules, and regulations.<sup>22</sup> This includes establishing an oversight program to ensure compliance with merit system principles that prohibit discrimination—including on the basis of disability—in all aspects of personnel management, among other things.<sup>23</sup> Additionally, OPM is responsible for monitoring federal agencies' implementation of affirmative action programs for disabled veterans, including providing technical

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<sup>19</sup>For regulations implementing the nondiscrimination and reasonable accommodation obligations under section 501 of the Rehabilitation Act, see part 1630 of title 29 of the Code of Federal Regulations. For regulations implementing the affirmative action program plan requirements of section 501 of the Rehabilitation Act, see section 1614.203 of title 29 of the Code of Federal Regulations.

<sup>20</sup>Exec. Order No. 13548, *Increasing Federal Employment of Individuals with Disabilities*, 75 Fed. Reg. 45,039 (Jul. 30, 2010).

<sup>21</sup>29 C.F.R. § 1614.203(d)(7). The 2 percent goal for targeted disabilities is a subset of, not in addition to, the 12 percent goal. Both goals may apply to two separate pay groupings: GS-1 to GS-10 and GS-11 to Senior Executive Service.

<sup>22</sup>5 U.S.C. § 1103(a)(5).

<sup>23</sup>5 U.S.C. § 1104(b)(2). The merit system principles are set forth under section 2301 of title 5 of the United States Code.

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assistance and reporting on progress made by agencies.<sup>24</sup> OPM annually prepares the Federal Equal Opportunity Recruitment Program Report, which contains information on the representation of women, racial or ethnic minorities, and persons with disabilities within the federal government.

The EEOC is 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. An employer or other covered entity is also prohibited from retaliating against an applicant or employee because they assert their rights under these laws. EEOC regulations direct agencies to maintain a continuing affirmative action program to promote equal opportunity and to identify and to eliminate discriminatory practices and policies.<sup>25</sup> The EEOC requires all executive agencies to submit an annual report, commonly referred to as the MD-715.<sup>26</sup> EEOC MD-715 guidance calls for federal agencies to continually work toward preventing all forms of discrimination and eliminating barriers that may impede free and open competition in the workplace.<sup>27</sup> The guidance lays out a four-step process for the identification and elimination of such barriers, which are outlined in figure 1.

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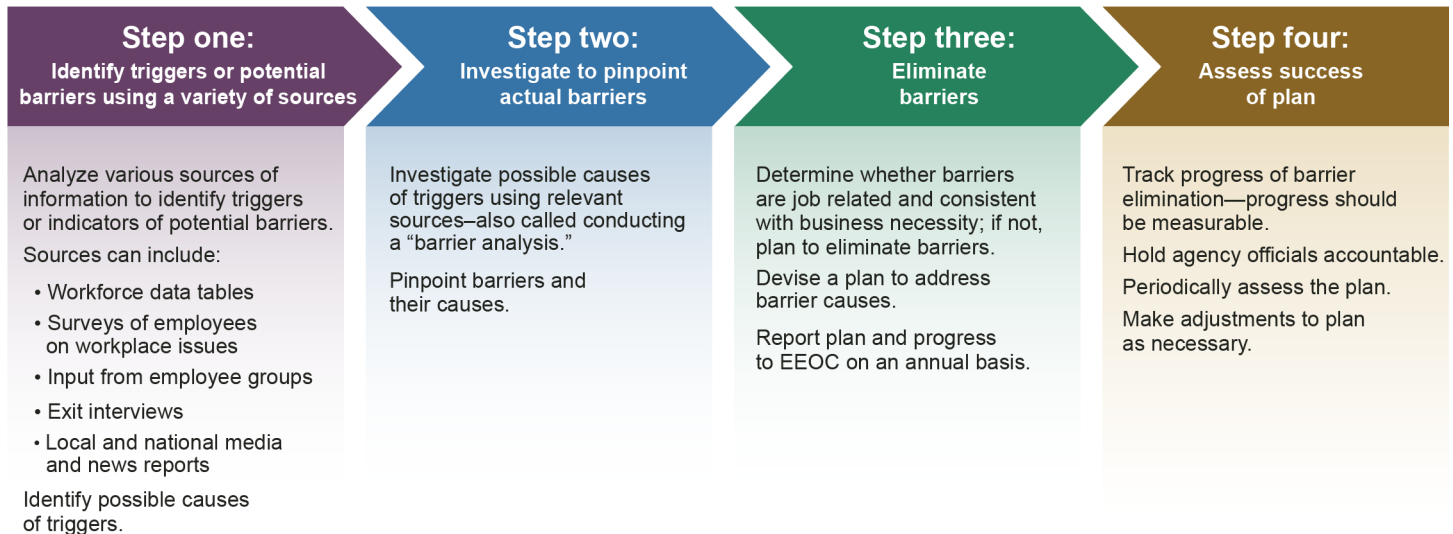
<sup>24</sup>See, for example, 38 U.S.C. § 4214.

<sup>25</sup>29 C.F.R. §1614.102(a).

<sup>26</sup>EEOC does not require a separate MD-715 report from IC elements that are a sub-component of a reporting agency. See <https://www.eeoc.gov/federal-sector/management-directive/section-717-title-vii>.

<sup>27</sup>MD-715 defines a barrier as an agency policy, procedure, practice, or condition that limits or tends to limit employment opportunities for members of a particular gender, race, or ethnic background, or for an individual (or individuals) based on disability status. As part of an on-going obligation, agencies must conduct a self-assessment on at least an annual basis to monitor progress and identify areas where barriers may operate to exclude certain groups and develop strategic plans to eliminate barriers.

**Figure 1: Equal Employment Opportunity Commission’s (EEOC) Management Directive 715 Process for Identifying and Eliminating Barriers**



Source: GAO analysis of Equal Employment Opportunity Commission guidance. | GAO-21-83

## Mission and Organization of the IC

The Director of National Intelligence serves as head of the IC and acts as the principal adviser to the President and National Security Council on intelligence matters related to national security. The IC is comprised of 17 executive branch agencies and organizations, generally referred to as IC elements. These IC elements include two independent agencies, eight IC elements within DOD, and seven IC elements across five other executive departments. Table 1 provides a list of the 17 IC elements.

**Table 1: List of 17 Intelligence Community (IC) Elements**

<b>Independent IC elements</b>	<ul style="list-style-type: none"> <li>• Director of National Intelligence</li> <li>• Central Intelligence Agency</li> </ul>
<b>IC elements within the Department of Defense</b>	<ul style="list-style-type: none"> <li>• Defense Intelligence Agency</li> <li>• National Security Agency</li> <li>• National Geospatial-Intelligence Agency</li> <li>• National Reconnaissance Office</li> <li>• U.S. Air Force Intelligence</li> <li>• U.S. Navy Intelligence</li> <li>• U.S. Army Intelligence</li> <li>• U.S. Marine Corps Intelligence</li> </ul>
<b>IC elements in other departments</b>	<ul style="list-style-type: none"> <li>• Department of Energy’s Office of Intelligence and Counterintelligence</li> <li>• Department of Homeland Security’s Office of Intelligence and Analysis</li> <li>• Drug Enforcement Administration’s Office of National Security Intelligence</li> <li>• Federal Bureau of Investigation’s National Security Branch</li> <li>• Department of the Treasury’s Office of Intelligence and Analysis</li> <li>• Department of State’s Bureau of Intelligence and Research</li> <li>• U.S. Coast Guard Intelligence</li> </ul>

Source: Office of the Director of National Intelligence. | GAO-21-83

Note: Section 3003 of title 50, United States Code, defines the IC as the elements listed in the table above as well as such other elements of any department or agency as designated by the President or jointly by the Director of National Intelligence and the head of the department or agency concerned, as an element of the intelligence community.

## Oversight of Workforce Diversity in the IC

ODNI’s core mission is to lead the IC in intelligence integration. ODNI also provides IC-wide oversight and guidance in developing, implementing, and measuring progress in equal employment opportunity, diversity, and inclusion. The IC EEOD Chief is the principal adviser to the Director of National Intelligence and IC senior leaders on issues related to equity, fairness, diversity, and inclusion, and reports directly to the Director of National Intelligence. IC EEOD consists of three functional areas—EEO Compliance; IC Diversity Outreach; and IC Strategy, Analysis and Assessments. IC EEOD prepares ODNI’s annual report to Congress on the status of hiring, retention, and career development for women, minorities, and persons with disabilities within the IC, among other information. ODNI established the IC EEOD Council, which consists of representatives from each of the IC elements and serves as a forum for coordinating, evaluating, and improving diversity policies and programs, among other issues, within the IC.

The Under Secretary of Defense for Intelligence and Security (USD (I&S)) exercises planning, policy, and strategic oversight over all DOD

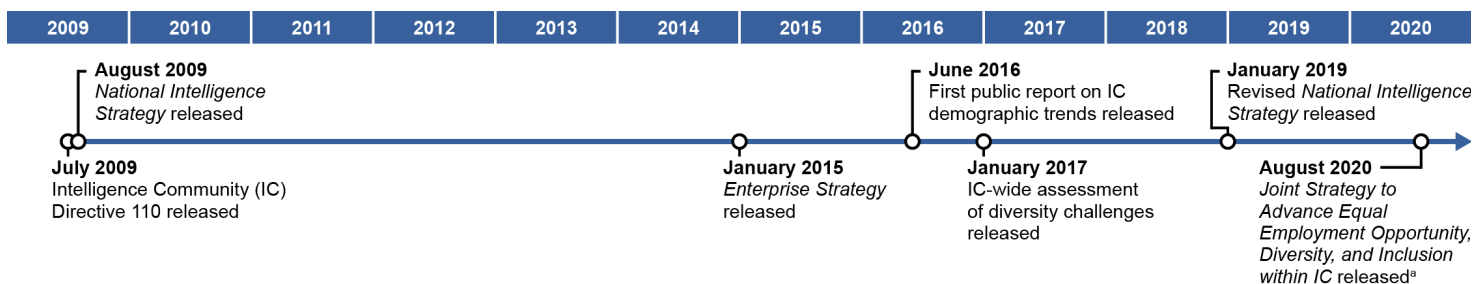


intelligence, counterintelligence, and security policy, plans, and programs, among other responsibilities. Further, the USD (I&S) exercises oversight of personnel policy regarding defense intelligence positions to ensure the defense intelligence elements are staffed, equipped, trained, structured, and ready to support DOD missions and satisfy the needs of the DOD and the IC. Within USD (I&S), the Human Capital Management Office is responsible for conducting continuous evaluation of DOD intelligence human capital programs and providing guidance to the defense intelligence components to ensure DOD's intelligence human capital strategy and direction are aligned with ODNI's strategy and direction.

## Timeline of Significant IC Workforce Diversity Strategies and Reporting

The IC has engaged in a range of diversity-related activities over the past 10 years, to include the development of new workforce diversity policies, plans, and reports, as shown in figure 2.

**Figure 2: Timeline of Significant Intelligence Community Workforce Diversity Strategies and Reporting**



Source: GAO summary of Office of Director of National Intelligence (ODNI) data. | GAO-21-83

<sup>a</sup>ODNI officials indicated that the *Joint Strategy to Advance Equal Employment Opportunity, Diversity, and Inclusion within the United States IC (2020-2023)* was publicly released in August 2020.

- Intelligence Community Directive 110.** This directive establishes the IC's policy to promote equal employment opportunity and to identify and eliminate discriminatory practices in the IC. It also promulgates policy to promote diversity in the IC as a means of enhancing the intelligence mission. Further, Intelligence Community Directive 110 states that the IC shall provide equal opportunity in employment for all persons, ensure nondiscrimination and protection from reprisal in employment matters, and promote the full realization of equal employment opportunity and diversity through a continuing proactive program across the IC.
- Enterprise Strategy.** IC EEOD convened equal employment opportunity and diversity principals from all 17 IC elements to develop

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a strategic framework for ensuring that the IC is best positioned to meet its mission-critical EEO, diversity, and inclusion imperatives.

- **2015 annual IC demographic report.** This report, released in June 2016, reflects the first year that ODNI began publicly releasing an overview of the IC's workforce demographics with regard to women, racial or ethnic minorities, and persons with disabilities.
- **IC-wide assessment of workforce diversity challenges.** IC EEOD conducted an in-depth assessment of barriers pertaining to hiring, retention, and career development of women, minorities, and persons with disabilities in the IC. The report built upon extensive prior data analysis conducted across the IC.<sup>28</sup>
- **National Intelligence Strategy.** The 2009 and 2019 strategies emphasize the importance of building a diverse workforce.<sup>29</sup> The 2019 strategy specifically instructs the IC to shape a diverse workforce with the skills and capabilities needed to address enduring and emerging requirements.
- **Joint Strategy to Advance Equal Employment Opportunity, Diversity, and Inclusion within the United States IC (2020-2023)** (hereafter called the *Joint Strategy*). The *Joint Strategy* communicates a shared vision, mission, and plan to improve the IC's ability to hire, retain, and promote a more diverse workforce, especially with regard to underrepresented demographic groups; to cultivate an inclusive workplace; and to continue important compliance work with greater efficiency and impact. The *Joint Strategy* builds upon three foundational documents, including *The National Intelligence Strategy of the United States of America (2019)*; *Diversity and Inclusion: Examining Workforce Concerns within the United States Intelligence Community (2017)*; and *A Pledge to Our People*, signed by the Directors of all 17 IC elements.

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<sup>28</sup>IC Equal Employment Opportunity and Diversity Office, *Diversity and Inclusion: Examining Workforce Concerns Within the Intelligence Community* (January 2017).

<sup>29</sup>Office of the Director of National Intelligence, *The National Intelligence Strategy* (August 2009) and Office of the Director of National Intelligence, *National Intelligence Strategy of the United States of America* (2019).

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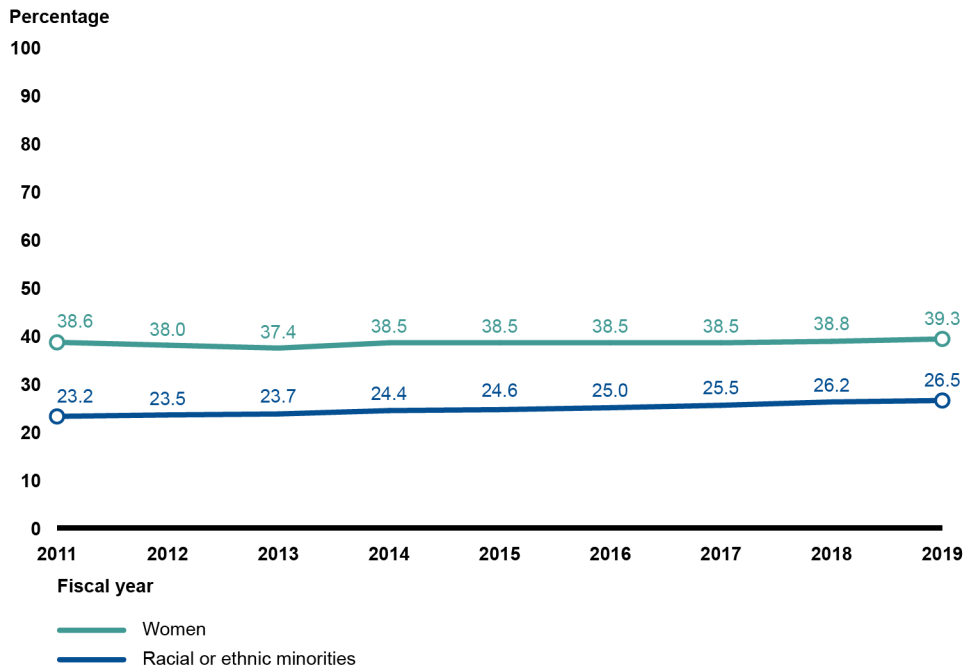
ODNI Reported an Increase in the Proportion of Some Demographic Groups within the IC, but Proportions Remain Lower than Key Benchmarks and Among Higher Ranks

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ODNI Reported a Relatively Stable Proportion of Women and a Small Increase in Racial or Ethnic Minorities within the IC Workforce from Fiscal Years 2011 through 2019

ODNI reported a relatively stable proportion of women and a small increase in racial or ethnic minorities among the 17 IC elements from fiscal years 2011 through 2019, the most recent data available, as summarized in figure 3.

**Figure 3: Proportion of Women and Racial or Ethnic Minorities within the Intelligence Community Workforce, Fiscal Years 2011–2019, as Reported by ODNI**

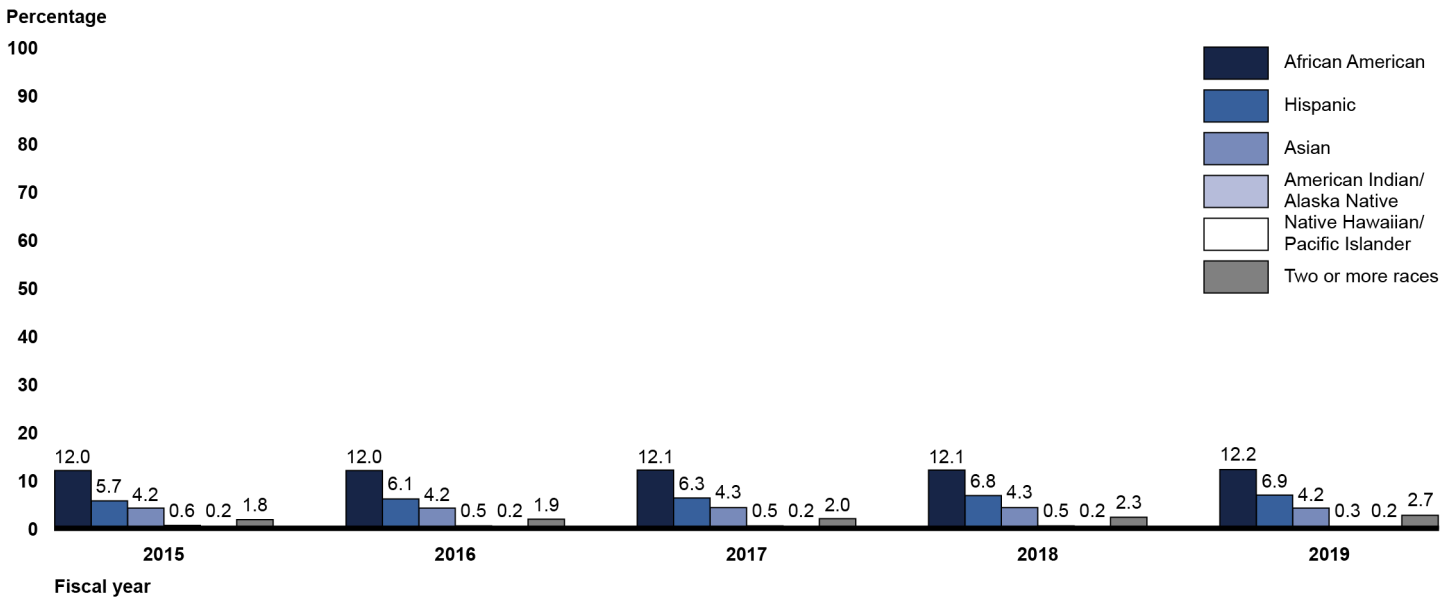


Source: GAO summary of Office of Director of National Intelligence (ODNI) data. | GAO-21-83

During this period:

- The proportion of women was reported as remaining mostly stable over time, changing from 38.6 percent to 39.3 percent—a .7 percentage point change.
- The proportion of racial or ethnic minorities was reported as increasing from 23.2 percent to 26.5 percent—a 3.3 percentage point increase. Furthermore, the proportion of racial or ethnic minorities represented in the IC remained relatively stable from fiscal year 2015 to 2019, as summarized in figure 4.

**Figure 4: Proportion of Racial or Ethnic Minorities within the Intelligence Community Workforce, Fiscal Years 2015–2019, as Reported by ODNI**



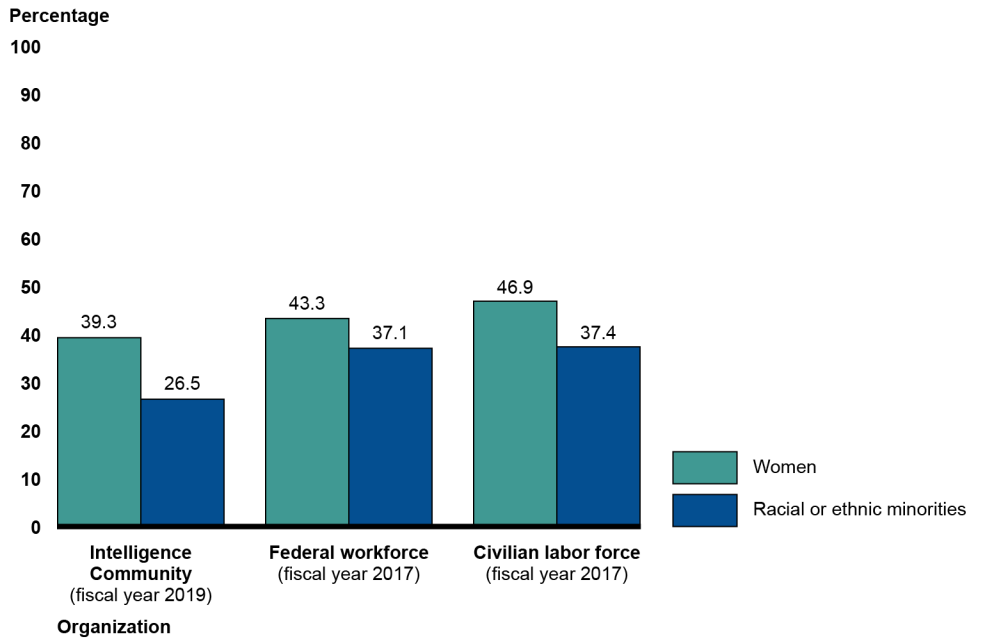
Source: GAO summary of Office of Director of National Intelligence (ODNI) data. | GAO-21-83

ODNI officials noted that while they are working toward increasing the proportion of women and racial or ethnic minorities, they believe new recruitment, hiring, and management policies and practices will continue to improve the representation of women and racial or ethnic minorities within the IC. While we did not assess the specific impact of these programs on diversity trends, we did assess actions taken by IC elements and ODNI to improve the management of workforce diversity policies, programs, and initiatives, as discussed later in this report.

### ODNI Reported That the Proportion of Women and Racial or Ethnic Minorities in the IC Remained Lower than Comparable Benchmarks in Fiscal Year 2019

ODNI reported the proportion of women and racial or ethnic minorities was below key benchmarks among the 17 IC elements during fiscal year 2019, as summarized in figure 5.

**Figure 5: Proportion of Women and Racial or Ethnic Minorities within the Intelligence Community Workforce in Fiscal Year 2019 Compared to the Federal Workforce and Civilian Labor Force, as Reported by ODNI**



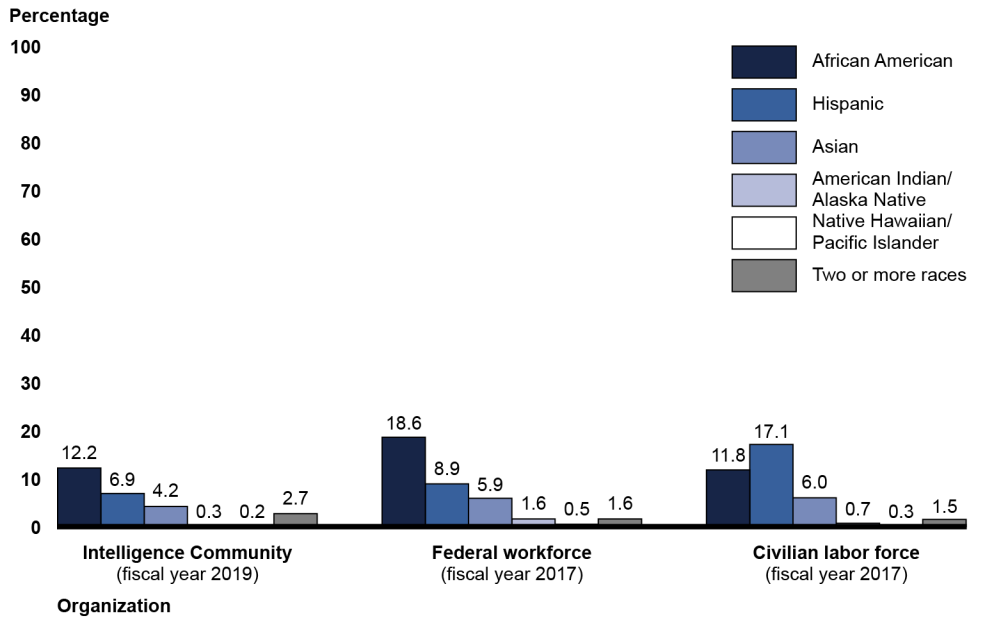
Source: GAO summary of Office of Director of National Intelligence (ODNI) data. | GAO-21-83

We compared the IC’s proportion of women and racial or ethnic minorities in fiscal year 2019, as reported by ODNI, to the federal workforce in 2017 and the civilian labor force in 2017 and found that<sup>30</sup>:

- The proportion of women in fiscal year 2019 (39.3 percent) is lower than the federal workforce in fiscal year 2017 (43.3 percent) and the civilian labor force in fiscal year 2017 (46.9 percent).
- The proportion of racial or ethnic minorities in fiscal year 2019 (26.5 percent) is lower than the federal workforce in fiscal year 2017 (37.1 percent) and the civilian labor force in fiscal year 2017 (37.4 percent). Furthermore, the proportion of each racial or ethnic minority group is lower than the federal workforce and most of the civilian labor force during this period, as summarized in figure 6.

<sup>30</sup>Relevant benchmarks include the federal workforce and the civilian labor force. The IC workforce data is derived from ODNI’s IC Annual Demographic Report for persons employed in IC elements. The federal workforce and civilian labor force data are derived from OPM’s most recent Federal Equal Opportunity Recruitment Program Report, which was issued on October 2, 2017.

**Figure 6: Proportion of Racial or Ethnic Minorities within the Intelligence Community Workforce in Fiscal Year 2019 Compared to the Federal Workforce and Civilian Labor Force, as Reported by ODNI**



Source: GAO summary of Office of Director of National Intelligence (ODNI) data. | GAO-21-83

ODNI officials indicated that using the federal workforce and civilian labor force as benchmarks is appropriate, but noted that it is challenging to compare the IC’s workforce to other sectors and organizations given the unique hiring authorities and challenges the IC faces in employing and retaining staff. For example, other federal and private sector organizations do not require a large portion of their workforce to maintain a Top Secret security clearance, which can delay hiring dates considerably and create potential challenges for individuals who are unable to wait for an employment offer, according to the same officials.<sup>31</sup> Many IC positions require such a clearance, which can greatly restrict the number and diversity of staff available to fill those positions, according to the same ODNI officials. IC elements have identified challenges retaining diverse staff when staff perceive lower hiring and promotion rates for certain demographic groups. For additional information on challenges

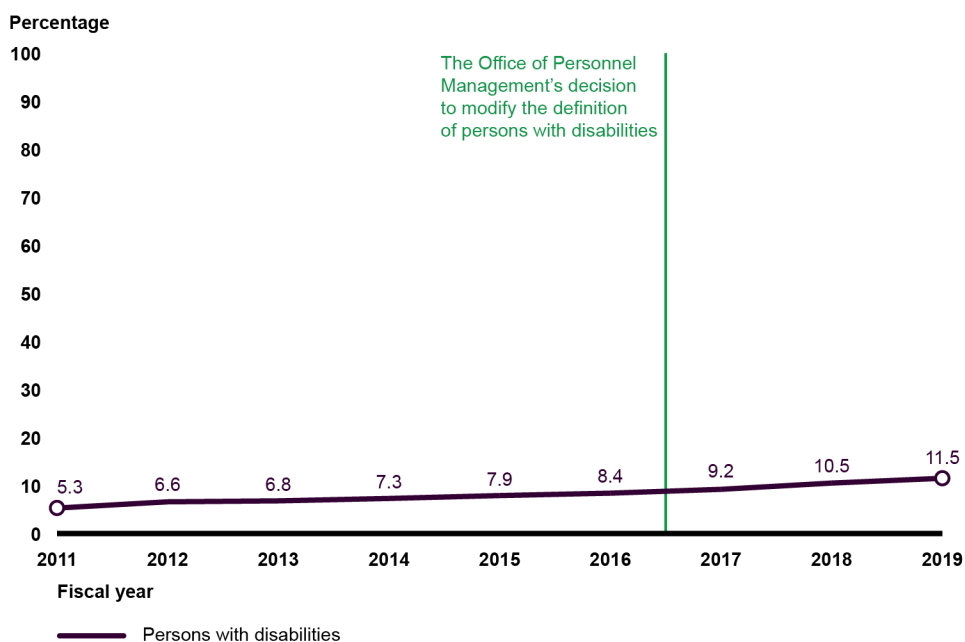
<sup>31</sup>For additional information on the security clearance process, including obtaining a Top Secret security clearance, please see GAO, *Intelligence Community: Additional Guidance, Collaboration, and Automation Would Help Enhance the Hiring Process*. GAO-20-14SU (Washington D.C.: Oct. 2, 2019).

hiring, promoting, and retaining a diverse workforce, see appendix I of this report.

### ODNI Reported the Proportion of Persons with Disabilities within the IC's Workforce Increased from Fiscal Years 2011 through 2019, but Remains below Federal Benchmarks

ODNI reported the proportion of persons with disabilities among the 17 IC elements increased from fiscal year 2011 to fiscal year 2019, as summarized in figure 7.

**Figure 7: Proportion of Persons with Disabilities within the Intelligence Community Workforce from Fiscal Years 2011–2019, as Reported by ODNI**



Source: GAO summary of Office of Director of National Intelligence (ODNI) data. | GAO-21-83

Note: In October 2016, the Office of Personnel Management modified the Standard Form 256, Self-Identification of Disability Form, to reflect changes to terms used to describe targeted disabilities, serious health conditions, and other disabilities; simplify the description of conditions; and, provide respondents with the option of identifying that they have a medical condition without specifying a diagnosis.

Specifically, ODNI reported the proportion of persons with disabilities increased from 5.3 percent in fiscal year 2011 to 11.5 percent in fiscal year 2019—an overall 6.2 percentage point increase. ODNI officials noted that the increase in persons with disabilities within the IC workforce during this timeframe is likely the result of new recruiting and hiring practices, the willingness of IC staff to self-report a disability, and OPM 's 2016 decision to modify the definition of persons with disabilities to include additional



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categories and descriptors.<sup>32</sup> While the overall proportion of persons with disabilities within the IC's workforce increased in fiscal year 2019, the IC fell below the federal government-wide goal that at least 12 percent of the federal workforce are persons with disabilities and 2 percent are persons with targeted disabilities.<sup>33</sup> Specifically, among the 17 IC elements, the proportion of persons with targeted disabilities did not change from fiscal year 2018 to fiscal year 2019, remaining at 1.6 percent.

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**ODNI Reported the Proportion of Women, Racial or Ethnic Minorities, and Persons with Disabilities in the IC Remains Lower in Higher Ranks for Fiscal Year 2019**

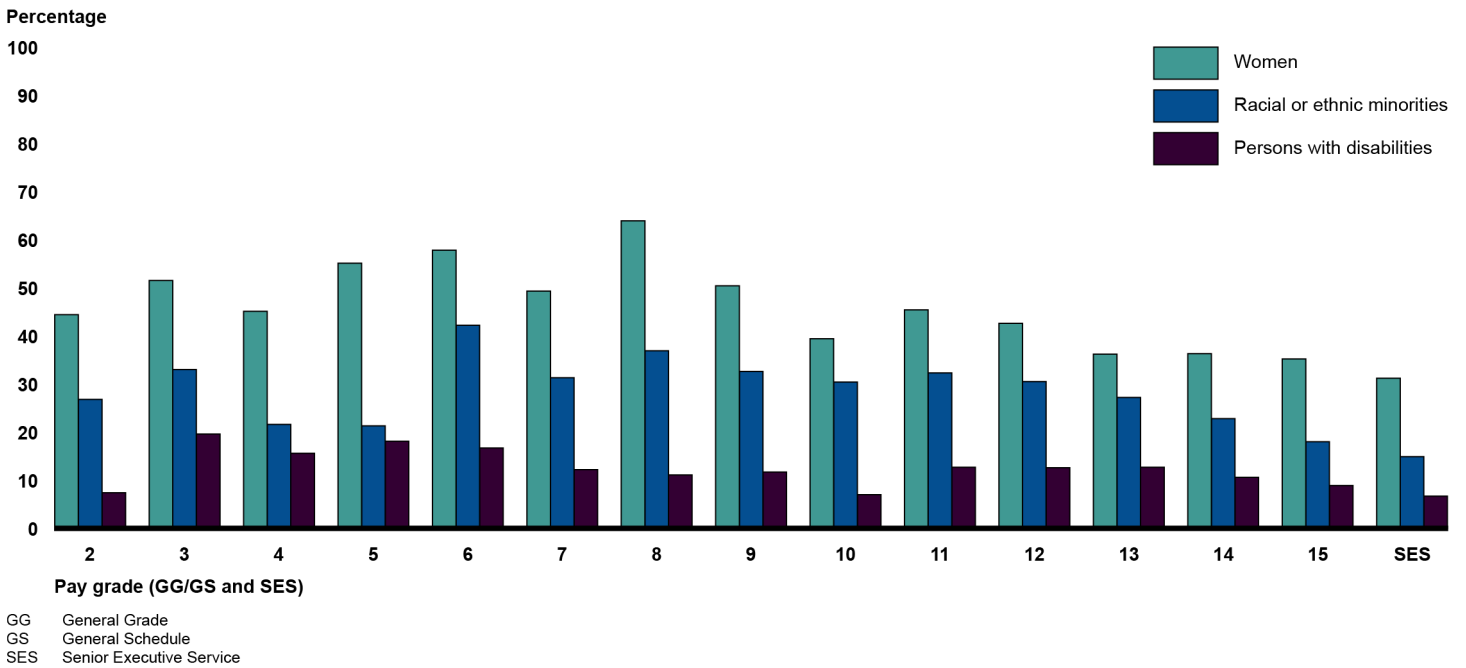
ODNI reported that among the 17 IC elements, representation of women, racial or ethnic minorities, and persons with disabilities, was lower among higher ranks in fiscal year 2019, as summarized in figure 8.

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<sup>32</sup>Office of Personnel Management *Memorandum: Resources for Disability Self-Identification Efforts*. (Washington, D.C.: Oct. 23, 2018).

<sup>33</sup>Targeted disabilities are the most severe disabilities to include deafness, blindness, partial or total paralysis, missing extremities, traumatic brain injury, dwarfism, intellectual disability, psychiatric disability, developmental disability, epilepsy or seizure disorder, significant disfigurement, and significant mobility impairment.

**Figure 8: Proportion of Women, Racial or Ethnic Minorities, and Persons with Disabilities Declined in Higher Pay Grades within the Intelligence Community Workforce in Fiscal Year 2019, as Reported by ODNI**



Source: GAO summary of Office of Director of National Intelligence (ODNI) data. | GAO-21-83

During this period, the proportion of women, racial or ethnic minorities, and persons with disabilities declined among higher pay grades and was lowest at the senior pay level—31.2 percent for women, 14.9 percent for racial or ethnic minorities, and 6.7 percent for persons with disabilities.

According to ODNI IC EEO officials, the federal government and private sector have similar representation trends or show signs of diminishing representation of women, racial or ethnic minorities, and persons with disabilities among higher ranks. The officials stated that it is challenging to quickly improve the representation of certain demographic groups within the IC’s workforce, including leadership positions, given the difficulties the IC faces in competing against the private sector, which often utilizes better compensation and may not require security clearances. Further, while the representation of diverse staff is lagging in mid-grade and senior positions, many IC elements have increased the hiring of diverse staff in entry level positions because they can start new staff at a lower salary and train the staff to meet agency needs, according to the same officials. However, it may take 10 to 15 years for these newly hired staff to matriculate from entry level positions into mid-grade and

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senior ranks, and according to a senior DOD official, attrition often happens more quickly than career progression for many of these individuals. Additionally, both ODNI and DOD officials indicated that diverse staff may leave the IC workforce if they perceive limited support or anticipate limited promotion potential within their organization.

ODNI and DOD officials report that they have completed or plan on undertaking several efforts to enhance workforce diversity within mid-grade and senior positions. For example:

- Under IC EEOD's leadership, each IC element's general counsel signed a pledge to enhance their respective outreach to minority communities for hiring in leadership positions. Moving forward, ODNI will continue to help the IC identify positions and career fields where mid-grade hiring can be expanded to include diverse candidates.
- ODNI officials noted that in response to findings of potential barriers, IC EEOD and ODNI leadership proposed a rotation program led by an IC senior executive assigned to ensure more access to developmental opportunities. Specifically, the rotation program will allow administrative staff to spend up to a year in non-administrative positions across the IC so they can develop new knowledge, skills, and abilities which enhances their ability to apply for, and be selected to, other career tracks with greater mid-grade promotion potential.
- To better assess the representation of diverse staff across all paygrades, IC EEOD officials anticipate expanding the categories the office collects and reports demographic data on to include sexual orientation and gender identity, among others.<sup>34</sup> While a specific timeframe has not been established for implementing this change, ODNI officials anticipate including this information in forthcoming annual demographic reports.
- A senior DOD official noted that while recruitment is an important aspect of enhancing mid-grade representation, more time and attention should focus on improving the retention of diverse staff to

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<sup>34</sup>ODNI's effort to expand the demographic categories it collects and reports data on is in response to language identified in H.R. 3494, a bill for the Intelligence Authorization Act for Fiscal Years 2018, 2019, and 2020 (Jul. 18, 2019) which states that the Director of National Intelligence may submit to the Office of Management and Budget and to the appropriate congressional committees a recommendation regarding whether the intelligence community should voluntarily collect more detailed data on demographic categories in addition to the race and ethnicity categories specified in the statistical policy directive issued by the Office of Management and Budget entitled "Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity."

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ensure staff hired at entry level positions stay within the organization and progress into mid-grade and senior positions. Further, the same senior DOD official noted that DOD will continue to evaluate opportunities to refine promotion standards and processes across the services and combat support agencies to increase the diversity of candidate pools and promotion determinations.

- Lastly, DOD and ODNI have developed new working groups to assess these issues and develop joint policies and plans to enact change, according to DOD and ODNI officials.

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## IC Elements Report Taking Steps to Address Leading Practices for Managing Workforce Diversity and Conducting Barrier Assessments, but Planning Gaps Exist

IC elements report taking steps to address leading practices for managing workforce diversity, through leadership commitment, recruitment, employee involvement, diversity training, performance, succession planning, and accountability.<sup>35</sup> However, most IC elements report gaps in workforce diversity strategic planning and measurement. Additionally, all IC elements report taking steps to identify barriers to diversity, but some have not completed required barrier assessments.

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## IC Elements Report Taking Steps to Address Leading Practices for Managing Workforce Diversity, but Report Gaps in Planning

IC elements report taking steps to address leading practices for managing workforce diversity, but some elements report gaps in planning. We found that most IC elements report taking steps to address seven of nine leading practices for diversity management including leadership commitment, recruitment, employee involvement, diversity training, performance, succession planning, and accountability.<sup>36</sup> However, most IC elements report not taking steps to address two of nine leading

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<sup>35</sup>For the purposes of this report, information addressing the Federal Bureau of Investigation's National Security Branch includes the agency's full workforce due to challenges related to determining which portion of the agency's workforce is considered part of the IC. In addition, information addressing the U.S. Air Force Intelligence includes the Sixteenth Air Force, which is responsible for integrating multisource intelligence, surveillance, and reconnaissance, cyber warfare, electronic warfare, and information operations capabilities across the conflict continuum.

<sup>36</sup>See [GAO-05-90](#). Diversity management is a process intended to create and maintain a positive work environment where the similarities and differences of individuals are valued, so that all can reach their potential and maximize their contributions to an organization's strategic goals and objectives.

practices for diversity management related to strategic planning and measurement. Our assessment of the steps IC elements report taking to implement diversity management leading practices is shown in table 2. For additional information on our IC element-level assessment of the steps IC elements report they have taken, see appendix II.

**Table 2: GAO’s Assessment of the Intelligence Community’s (IC) Workforce Diversity Efforts Compared to Leading Practices for Workforce Diversity Management**

Leading practices <sup>a</sup>	Description of leading practice	Steps GAO assessed for each leading practice	Number of IC elements that report taking steps to implement the leading practice
<b>Leadership commitment</b>	A vision of diversity demonstrated and communicated throughout an organization by top-level management.	(1) establish new or amend existing policies; (2) policy statements, speeches, and plans; (3) posts, statements, and information on the internal/external website; (4) senior leaders appointed to champion diversity; (5) additional related step	<b>Seventeen of 17</b> IC elements report taking multiple steps.
<b>Recruitment</b>	The process of attracting a supply of qualified, diverse applicants.	(1) develop a recruitment strategy; (2) establish partnerships with academic institutions that have a diverse student population; (3) establish partnerships with diverse professional organizations; (4) additional related step	<b>Fourteen of 17</b> IC elements report taking multiple steps, and three IC elements report they took one step.
<b>Employee involvement</b>	The contribution of employees in driving diversity throughout an organization.	(1) employee resource groups or affinity groups; (2) mentoring/networking programs to retain/develop diverse personnel; (3) diversity and inclusion advisory council; (4) encouragement of employee community outreach/ involvement; (5) additional related step	<b>Fourteen of 17</b> IC elements report taking multiple steps, two IC elements report taking one step, and one IC element reports taking no step.
<b>Diversity training</b>	Organizational efforts to inform and educate management and staff about diversity.	(1) specialized diversity and inclusion training (e.g. unconscious bias training); (2) teambuilding, communication, conflict-resolution training; (3) mandatory diversity training for new hires, (4) mandatory diversity training for hiring and selection panel participants, and (5) mandatory diversity training for senior leaders; (6) additional related step	<b>Fourteen of 17</b> IC elements report taking multiple steps, and three IC elements report taking one step.
<b>Performance</b>	The understanding that a more diverse and inclusive workforce can yield greater productivity and improve individual and organizational performance.	(1) diversity strategic plan contained a policy statement supporting the value of diversity of employees, customers, or suppliers; (2) diversity strategic plan contained the business case for diversity—that achieving an inclusive organization is a critical business issue; (3) diversity strategic plan contained the business case for diversity— understanding customer diversity; (4) diversity strategic plan contained a strategy designed for a diverse market	<b>Twelve of 17</b> IC elements linked diversity management with improved individual and IC element-level performance and five IC elements did not link diversity management with improved performance. <sup>b</sup>

Leading practices <sup>a</sup>	Description of leading practice	Steps GAO assessed for each leading practice	Number of IC elements that report taking steps to implement the leading practice
<b>Succession planning</b>	An ongoing, strategic process for identifying and developing a diverse pool of future leaders.	(1) documented succession plan to ensure diverse leaders; (2) diverse pool of candidates identified for promotion; (3) diverse evaluators, reviewers, or assessors that comprise promotion panels; (4) additional related step	<b>Nine of 17</b> IC elements report taking multiple steps, and eight IC elements report taking one step.
<b>Accountability</b>	The means to ensure that leaders are responsible for diversity by linking their performance assessment and compensation to the progress of diversity initiatives.	(1) managers have related diversity and inclusion performance objectives; (2) compensation based on achievement of diversity and inclusion goals; (3) additional related step	<b>Nine of 17</b> IC elements report taking multiple steps, seven IC elements report taking one step, and one IC element reports taking no step.
<b>Strategic planning</b>	Development of a diversity strategy and plan that align with the organization's strategic plan.	(1) current diversity strategic plan; (2) complete diversity strategic plan that contained sufficient diversity-related objectives, timeframes, and responsibilities	<b>Three of 17</b> IC elements have current and complete strategic plans. <sup>b</sup>
<b>Measurement</b>	A set of quantitative and qualitative measures that assess the impact of various aspects of an overall diversity program.	(1) utilize performance measures in diversity strategic plan; (2) analyze agency/element workforce composition data; (3) assess employee perceptions of diversity and inclusion (e.g. surveys or focus groups); (4) holistically assess agency/element diversity and inclusion programs, plans, policies; (5) gather feedback from employee resource groups, affinity groups, or special emphasis groups; (6) conduct barrier assessment; (7) develop Federal Equal Opportunity Recruitment Program submission; (8) additional related step	<b>Six of 17</b> IC elements have diversity-related performance measures. <sup>b</sup>

Source: GAO analysis of IC element documents. | GAO-21-83

Note: We assessed actions IC elements reported taking against leading practices for diversity management GAO identified in [GAO-05-90](#). In 2005, we reported on these practices that we developed based on completing a literature review, and selecting a list of recognized diversity experts based on interviews with federal officials and others. We gathered views on leading practices in a data collection instrument and reviewed the responses of these experts, counting the number of times an expert cited a practice.

<sup>a</sup>Data were collected to assess whether IC elements have reported taking steps consistent with key leading practices in diversity management. However, we did not assess the quality of implementation or direct impacts of these reported steps.

<sup>b</sup>We compared questionnaire responses with element documents for the leading practices.

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Most IC Elements Report Taking Multiple Steps to Implement Seven of the Nine Leading Practices for Managing Workforce Diversity

Most IC elements report taking multiple steps to implement seven of nine leading practices for diversity management, including leadership commitment, recruitment, employee involvement, diversity training, performance, succession planning, and accountability, as discussed below.<sup>37</sup>

**Leadership commitment.** All 17 IC elements report that their leadership demonstrates commitment to workforce diversity in multiple ways. For example, of the 17 IC elements, 14 report they appointed senior leaders to champion diversity and 13 report their senior leaders communicated this commitment internally and externally. In addition, of the 17 IC elements, 15 report that their leaders issued policy statements, made speeches, or developed plans to demonstrate leadership commitment, while 13 report that their leaders established new or amended existing policies. For example, the Under Secretary for the Department of Homeland Security's Office of Intelligence and Analysis issued a policy statement supporting the element's first employee association—Pride, Resources, Inclusivity, Support, Mentorship—and shared information about the association with the element's workforce.<sup>38</sup> The Under Secretary for the Department of Homeland Security's Office of Intelligence and Analysis also appointed a senior leader to champion diversity—the Workforce Management and Engagement Chief—in October 2019.

**Recruitment.** Fourteen of 17 IC elements report taking multiple steps to ensure they have a process to attract a supply of qualified, diverse applicants for employment. For example, of the 14 IC elements that report having a process, 13 note that they partnered with diverse professional organizations to improve their ability to recruit diverse candidates and 11 report they developed a formal strategy to recruit diverse applicants. For example, the National Security Agency's recruitment strategy identifies recruitment methods, goals, and activities to attract diverse candidates, including:

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<sup>37</sup>In this section of the report, we discuss information specific to elements that report taking multiple steps to implement a leading practice.

<sup>38</sup>Department of Homeland Security, Office of Intelligence and Analysis, *Department of Homeland Security's Office of Intelligence and Analysis Pride, Resources, Inclusivity, Support, Mentorship Employee Association Charter* (June 15, 2019).

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- Partnering with academic institutions to identify a diverse applicant pool and apply a data-driven approach for selecting institutions for targeted recruitment.
  - Developing diversity recruitment goals for women, minorities, and individuals with disabilities and targeted disabilities, which officials report the element planned to exceed in fiscal year 2020.
  - Sponsoring regional recruitment events targeting densely populated areas—including executing an event involving travel to multiple academic institutions resulting in nearly 100 interviews and planning a regional event targeting science, technology, engineering, and math graduates.

**Employee involvement.** Fourteen of 17 IC elements report taking multiple steps to ensure employees contribute to promoting workforce diversity. Specifically, each element reports having employee resource groups or affinity groups and 11 of the 14 IC elements report having diversity and inclusion advisory councils. For example, the Department of Treasury’s Office of Intelligence and Analysis established a diversity and inclusion advisory council that operates as a forum for employees to discuss diversity-related challenges, referred to as the Unity Council.<sup>39</sup> In addition, of the 14 IC elements, 10 report that they have mentoring or networking programs to develop and retain diverse personnel. For example, among other things, the Federal Bureau of Investigation has a cross-cultural mentoring program that pairs senior level mentors with mentees of a different gender, race, or ethnicity.

**Diversity training.** Fourteen of 17 IC elements report that they offer multiple training and education opportunities to increase awareness and understanding of diversity and inclusion. Specifically, of the 14 IC elements that offer multiple training and education opportunities, 12 report that they offer specialized diversity and inclusion training, including unconscious bias training, and 13 report that they provide related teambuilding, communication, and conflict-resolution training. Eight IC elements also report that they require new hires and senior leaders to complete diversity training, and 11 IC elements report that they require hiring and selection panel participants to complete diversity training. For example, U.S. Coast Guard Intelligence officials report that the U.S. Coast Guard conducts training to foster collaborative environments and

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<sup>39</sup>The Unity Council represents various racial, ethnic, professional, and sexual orientation minority groups within the element, and liaises with ODNI’s IC Affinity Network—where senior leaders across the IC chair 10 networks in positions that are collateral duty assignments.



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training to interrupt statements or actions unintentionally expressing a stereotype or prejudiced attitude toward a person in a marginalized group, among other things. U.S. Coast Guard Intelligence officials also report that they are developing a cadre of 125 diversity and inclusion change agents trained to facilitate difficult conversations in the workplace.

**Performance.** Twelve of 17 IC elements linked management of a diverse workforce with improved individual and element-level performance. Specifically, of the 12 IC element diversity strategic plans containing statements that linked diversity management with performance, 11 IC element plans contained a statement supporting the value of diverse employees, customers, or suppliers. In addition, six of the 12 IC element plans contained a statement supporting the business case for diversity by achieving an inclusive organization as a critical business issue, while two of the 12 IC element plans contained a statement supporting the business case for diversity by demonstrating an understanding of customer diversity. None of the 12 IC element plans contained a strategy designed for a diverse market. For example, the diversity strategic plan utilized by the Department of State's Bureau of Intelligence and Research contains two statements linking diversity management with performance. Specifically,

- The plan contains a statement supporting the value of diverse employees, customers, or suppliers including that a diverse workforce brings creativity to the workplace, drives innovation, and strengthens the ability to address increasingly complex international challenges the Department is entrusted to resolve.
- The plan also contains a statement supporting the business case for diversity by achieving an inclusive organization as a critical business issue. The plan includes an objective that states the Department will collect relevant data to establish a business case for diversity and inclusion.

In addition to the IC element diversity strategic plans, IC EEO officials noted the *National Intelligence Strategy* sets the strategic direction for IC elements in developing and managing a diverse, inclusive, and expert workforce. An objective in the *National Intelligence Strategy* states that linking diversity and inclusion drives innovation and enables the IC to attract and retain the highly-skilled workforce needed to meet mission requirements. The intent of the objective is reflected in each of the plans identified above, and directly referenced in one of the 12 IC element plans.

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**Succession planning.** Nine of 17 IC elements report taking multiple steps to maintain an ongoing, strategic process to identify and develop a diverse pool of future leaders. Specifically, all nine IC elements report they have diverse evaluators, reviewers, or assessors that comprise promotion panels. For example, the U.S. Air Force Intelligence requires that civilian hiring panels for certain grades consist of at least three members, equal or senior in grade to the position being filled, and that panel members be diverse, as defined by Air Force guidance, among other things.<sup>40</sup> In addition, of these nine IC elements, three report that they had documented succession planning to ensure diverse future leaders, and seven report that they identified a diverse pool of candidates for promotion.

**Accountability.** Nine of 17 IC elements report taking multiple steps to ensure leaders are responsible for workforce diversity. Specifically, all nine IC elements report that they utilize diversity-related performance measures for managers or supervisors. Moreover, five of these nine IC elements report having developed a process to compensate managers based on achieving diversity-related goals. For example, the National Geospatial-Intelligence Agency reports that it assesses managers on diversity-related goals set by ODNI that require employees to demonstrate, among other things, respect for diversity and core organizational and IC values.<sup>41</sup> Officials report that based on DOD guidance, the element compensates certain managers on achieving those goals, among others.<sup>42</sup>

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<sup>40</sup>Department of the Air Force, Headquarters Sixteenth Air Force (Air Forces Cyber), Guidance Memorandum for Civilian Hiring. The Air Force defines diversity broadly as a composite of individual characteristics, experiences, and abilities, including but not limited to personal life experiences, geographic and socioeconomic backgrounds, cultural knowledge, educational background, work experience, language abilities, physical abilities, philosophical and spiritual perspectives, age, race, ethnicity, and gender. Department of the Air Force, Air Force Instruction 36-7001, *Personnel: Diversity and Inclusion* (Feb. 19, 2019).

<sup>41</sup>Office of the Director of National Intelligence, Intelligence Community Directive Number 651: *Performance Management System Requirements for the Intelligence Community Civilian Workforce* (effective Nov. 28, 2007)(amended Apr. 4, 2012).

<sup>42</sup>DOD Instruction 1400.25, Volume 2012, *DOD Civilian Personnel Management System: Defense Civilian Intelligence Personnel System (DCIPS) Performance-Based Compensation* (Apr. 28, 2012).

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Most IC Elements Report Taking Few Steps to Implement Two of the Nine Leading Practices for Managing Workforce Diversity

While most IC elements report having taken multiple steps to implement seven of nine leading practices for diversity management, most IC elements also report that they have either taken one or no step to implement the remaining two leading practices, including strategic planning and measurement, as discussed below.<sup>43</sup>

**Strategic planning.** Fourteen of 17 IC elements lack current and complete strategic plans to address key aspects of their workforce diversity efforts including specific objectives, timeframes for achieving objectives, and identifying offices or individuals with responsibility for implementing the objectives, according to our analysis. As an example of a current and complete plan, the Department of Treasury's Office of Intelligence and Analysis utilizes the Department of Treasury's Strategic Plan (2018-2022) as its diversity strategic plan. Specifically:

- The plan contains five goals, including a goal to achieve operational excellence. This goal contains a workforce management objective, which addresses fostering a culture of innovation to hire, engage, develop, and optimize a diverse workforce with the competencies necessary to accomplish the Department's mission.
- The plan specifies timeframes for achieving objectives. For example, the plan directs the Department to complete annual organizational performance reviews to help achieve strategic objectives in the plan. The plan also directs the Department to update the strategic plan to highlight changes in objectives resulting from analyzing outcomes, success criteria, and other evidence.
- The plan identifies individuals responsible for achieving objectives, including Department offices and senior leaders responsible for portions of the performance review cycle and identifies external stakeholders for objectives. For example, the workforce management objective external stakeholders include the Office of Management and Budget and OPM.

However, 14 of the 17 IC elements lacked current and complete strategic plans. Specifically:

- Five IC elements lack current diversity strategic plans. The Department of Energy's Office of Intelligence and Counterintelligence relies on an outdated parent organization plan; however, officials report they expect the Department will develop a new plan by the end

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<sup>43</sup>In this section of the report, we discuss information specific to elements that report that they have either taken one or no step to implement a leading practice.

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of fiscal year 2020. Two other IC elements report that they are in the process of developing or finalizing plans. Specifically, Defense Intelligence Agency officials report staff are developing a plan. However, U.S. Marine Corps Intelligence officials report that they are still in the process of hiring staff in a newly-established function that will be responsible for developing related policies and plans. Two additional IC elements report they do not utilize either a parent organization or element-level plan—the U.S. Army Intelligence and Drug Enforcement Administration’s Office of National Security Intelligence. Officials from the Drug Enforcement Administration also report their element utilizes an agency plan; however, that plan is outdated.

- Nine IC elements lack complete diversity strategic plans. Specifically, two IC elements lack plans containing diversity objectives—the National Geospatial-Intelligence Agency and the U.S. Navy Intelligence. Eight IC elements lack plans containing specific timeframes to achieve related diversity objectives—ODNI, the Central Intelligence Agency, the National Security Agency, the National Geospatial-Intelligence Agency, the National Reconnaissance Office, the U.S. Navy Intelligence, the Department of Homeland Security’s Office of Intelligence and Analysis, and the Department of State’s Bureau of Intelligence and Research. Seven IC elements lack plans identifying individuals responsible for achieving related diversity objectives—ODNI, the Central Intelligence Agency, the National Geospatial-Intelligence Agency, the U.S. Air Force Intelligence, the U.S. Navy Intelligence, the Department of Homeland Security’s Office of Intelligence and Analysis, and the Department of State’s Bureau of Intelligence and Research. Officials from the Department of Homeland Security’s Office of Intelligence and Analysis report that while they primarily utilize an agency plan, they are in the process of developing an element plan that will be finalized by January 2021.

According to the *Enterprise Strategy*, IC elements should ensure that diversity is a critical consideration of succession and human capital planning.<sup>44</sup> In addition, our *Leading Diversity Management Practices* state that integrating diversity into strategic planning efforts is critical to foster a culture change that supports and values differences.<sup>45</sup> *Standards for Internal Control in the Federal Government* establish that management

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<sup>44</sup>Office of the Director of National Intelligence, *Intelligence Community Equal Employment Opportunity and Diversity Enterprise Strategy* (2015-2020).

<sup>45</sup>[GAO-05-90](#).

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should define the entity's objectives clearly and in alignment with the entity's mission and strategic plan. Objectives should specifically identify what is to be achieved, how, by whom, and in what timeframe, and should be defined in measurable terms so that performance toward achieving such objectives can be assessed consistently.<sup>46</sup> More specifically, the Office of Management and Budget clarifies that a strategic goal articulates clearly what the agency wants to achieve to advance its mission. For example, strategic objectives express specifically the path an agency plans to follow to achieve or make progress on a single strategic goal.<sup>47</sup> According to IC EEOD officials, IC elements have not consistently developed strategic plans to manage diversity with clearly defined objectives, timeframes, and responsibilities, which would help ensure diversity efforts align with human capital needs, because IC-wide guidance does not specify that IC elements should develop current and complete strategic plans to guide diversity efforts. IC EEOD officials noted that while current IC guidance does permit the IC elements to leverage existing departmental plans, IC elements must strengthen their element-level foundational diversity strategic planning documents. Further, IC EEOD officials stated that each IC element should have a plan that connects diversity initiatives to a broader strategic plan. IC EEOD officials noted elements within larger departments should at least endorse or utilize agency diversity planning documents. Ultimately, without a current and complete diversity strategic plan or planning document, IC elements may be investing in diversity efforts that do not align with human capital needs and may have little to no effect on enhancing diversity management.

**Measurement.** Six of 17 IC elements have diversity-related performance measures to assess progress toward achieving workforce diversity outcomes, although all 17 IC elements report taking multiple steps to assess aspects of their diversity management efforts. For example, the Central Intelligence Agency utilizes diversity-related performance measures identified in its diversity strategic plan. Specifically:

- The plan contains performance measures that assess the contribution of activities towards achieving overall diversity goals. One measure assesses the contribution of supervisors towards achieving overall

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<sup>46</sup>GAO-14-704G.

<sup>47</sup>Office of Management and Budget, *Preparation, Submission, and Execution of the Budget*, OMB Circular A-11 (revised July 2016).

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diversity goals based on employee climate surveys where results inform the delivery of related training activities.

- The plan also contains performance measures that assess overall diversity progress. For example, on a quarterly basis, Central Intelligence Agency Directorates review trends in assignment, application, selection, and promotion data to identify potential challenges to achieving overall diversity progress.

However, 11 of 17 IC elements report they did not have performance measures for various reasons. Specifically:

- Four IC elements report they did not develop performance measures—ODNI, the U.S. Marine Corps Intelligence, the Department of Energy’s Office of Intelligence and Counterintelligence, and the Department of Treasury’s Office of Intelligence and Analysis. However, officials from the U.S. Marine Corps Intelligence report that the element is in the process of hiring staff responsible for developing those measures, as mentioned above.
- Six IC elements report they utilize external measures or measures in element-developed MD-715 reports—the Defense Intelligence Agency, the National Reconnaissance Office, the U.S. Air Force Intelligence, the U.S. Navy Intelligence, the U.S. Army Intelligence, and the Drug Enforcement Administration’s Office of National Security Intelligence. However, according to OPM officials and our review of MD-715 reports, MD-715 reports do not articulate measures necessary to assess future goals and progress toward achieving workforce diversity goals.
- One IC element reports it is in the process of developing performance measures—the Department of Homeland Security’s Office of Intelligence and Analysis.

Our *Leading Diversity Management Practices* state that quantitative and qualitative performance measures translate diversity aspirations into practice. Further, our *Key Principles for Effective Strategic Workforce Planning* state that appropriately designed performance measures can be used to gauge two types of success—progress toward achieving certain goals and the contribution of certain activities toward achieving goals.<sup>48</sup> According to IC EEOD officials, IC leadership and the IC EEOD Council have developed a new proposal to include performance objectives in a majority of IC element performance reports. However, IC EEOD officials

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<sup>48</sup>GAO, *Human Capital: Key Principles for Effective Strategic Workforce Planning*, [GAO-04-39](#) (Washington, D.C.: Dec. 11, 2003).

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stated that IC-wide guidance does not specify that IC elements should develop such measures. Without measures such as tracking the return on investment of certain efforts like diversity training or tracking employee perceptions of progress over time based on survey responses, ODNI and DOD lack information needed to ensure that IC elements are making progress toward achieving diversity goals. Further, IC elements may invest in diversity initiatives that do not contribute to achieving related goals.

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### All IC Elements Report Taking Steps to Identify Barriers to Workforce Diversity, but Some Report Not Completing Required Barrier Assessments

All 17 IC elements report having a process to identify barriers to workforce diversity, but only eight IC elements report completing the barrier assessments required by EEOC. According to EEOC officials, assessments to identify barriers to diversity help ensure that agencies have a current and thorough understanding of the challenges they face in recruiting, hiring, promoting, and retaining a diverse workforce. Nine IC elements report they did not complete barrier assessments. Specifically:

- Five IC elements report that they relied on barrier assessments conducted by their parent organizations to identify barriers to diversity within their element—the Department of Energy’s Office of Intelligence and Counterintelligence, the Department of Homeland Security’s Office of Intelligence and Analysis, the Drug Enforcement Administration’s Office of National Security Intelligence, the Department of Treasury’s Office of Intelligence and Analysis, and the U.S. Coast Guard Intelligence.
- Four IC elements did not complete assessments for various reasons. Two IC elements report that they rely on other parent organizations to complete related assessments—the U.S. Marine Corps Intelligence and the Department of State’s Bureau of Intelligence and Research. Two additional IC elements report that they are developing processes to complete barrier assessments—the U.S. Air Force Intelligence and the National Reconnaissance Office.

EEOC requires all agencies to routinely assess barriers for the recruitment, hiring, and promotion of certain demographic groups and document the results.<sup>49</sup> Additionally, the *Enterprise Strategy* states that IC elements should develop and implement a process to routinely identify and eliminate systemic barriers that adversely affect career development

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<sup>49</sup>EEOC’s MD-715 provides that, as a part of a model equal employment opportunity program to prevent unlawful discrimination, federal agencies are to regularly evaluate their employment practices to identify barriers to equal employment opportunities in the workplace, take measures to eliminate identified barriers, and report annually on these efforts to EEOC.

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and advancement of all employees. IC EEOD officials stated that EEOC guidance applies to all federal agencies, including IC elements. Further, IC EEOD officials noted that all IC elements should have a written framework to eliminate barriers identified as part of the EEOC reporting process. However, according to IC EEOD officials, IC elements do not routinely take steps to identify and eliminate barriers to workforce diversity because IC-wide guidance does not specify mechanisms for identifying and eliminating barriers specific to each IC element, such as comparing workforce composition data to the Civilian Labor Force and determining if existing policies and practices contributed to lower representation of a certain demographic group. Without each IC element routinely completing a barrier assessment, ODNI and DOD lack assurance that the IC elements have identified the key areas they should address to better manage workforce diversity. Further, for the IC elements that rely on barrier assessments conducted by their parent organizations, this could mask barriers that the specific IC element faces for its portion of the workforce.

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## ODNI Is Taking Numerous Steps to Address Leading Practices for Coordinating Workforce Diversity Initiatives, but Does Not Consistently Hold IC Elements Accountable

ODNI IC EEOD has taken numerous steps to address leading practices for coordinating IC workforce diversity initiatives across the IC, but it has not consistently taken steps to reinforce accountability for IC elements to achieve diversity goals. As required by Intelligence Community Directive 110, the Chief of IC EEOD is responsible for leading and coordinating diversity efforts across the IC to promote compliance with equal employment opportunity authorities and consistency with IC diversity guidance. Based on our analysis of IC EEOD's policies, plans, and coordination efforts, we found that IC EEOD is taking multiple steps to enhance diversity efforts across the IC. Specifically, IC EEOD is meeting seven of eight leading practices for enhancing and sustaining collaboration such as defining and articulating common outcomes; establishing mutually reinforcing or joint strategies; and establishing compatible policies, procedures, and other means to operate across agencies.<sup>50</sup> However, IC EEOD partially meets the leading practice of reinforcing agency accountability (see table 3).

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<sup>50</sup>See [GAO-06-15](#). GAO previously reviewed relevant literature, prior reports, and interviewed experts in the area of collaboration and identified eight broad practices that can facilitate greater collaboration among federal agencies.



**Table 3: GAO’s Assessment of the Intelligence Community (IC) Equal Employment Opportunity and Diversity (EEO) Efforts against Leading Practices to Enhance and Sustain Collaboration among Federal Agencies**

<b>Leading practice<sup>a</sup></b>	<b>Definition</b>	<b>Rating met</b>	<b>Supporting policy</b>	<b>Selected supporting example</b>
<b>Define and articulate the common outcome</b>	Have a clear and compelling rationale to work together.	Yes	<i>National Intelligence Strategy</i>	Identifies the need to build a more diverse workforce
<b>Establish mutually reinforcing or joint strategies</b>	Establish strategies that work in concert and are joint in nature.	Yes	<i>Enterprise Strategy</i>	Establishes an IC-wide collaboration framework
<b>Identify and address need by leveraging resources</b>	Identify the human, information technology, physical, and financial resources needed to initiate or sustain their collaborative effort.	Yes	<i>Enterprise Strategy</i>	Identifies the need to leverage resources across five IC goals
<b>Agree on roles and responsibilities</b>	Work together to define and agree on their respective roles and responsibilities.	Yes	<i>Intelligence Community Directive 110</i>	Establishes the role of IC EEO Council
<b>Establish compatible policies, procedures, and other means to operate across agencies</b>	Address the compatibility of standards, policies, procedures, and data systems that will be used in the collaborative effort.	Yes	<i>Enterprise Strategy</i>	Provides instruction to integrate diversity into workforce planning
<b>Develop mechanisms to monitor, evaluate, and report results</b>	Create the means to monitor and evaluate their efforts to enable them to identify areas for improvement.	Yes	<i>Intelligence Community Directive 110</i>	States that IC EEO will lead the collection, analysis and use of IC workforce demographic information
<b>Reinforce individual accountability for collaborative efforts through performance management systems</b>	Set expectations for senior executives for collaboration within and across organizational boundaries in performance plans.	Yes	<i>Intelligence Community Leaders Pledge to Workforce</i>	Secured commitment from senior leaders to identify and eliminate discrimination in the IC
<b>Reinforce agency accountability for collaborative efforts through agency plans and reports</b>	Use strategic and annual performance plans as tools to drive collaboration with other agencies and establish complementary goals and strategies for achieving results.	Partial	<i>Enterprise Strategy</i>	Articulates general objectives but lacks clear implementation objectives and timeframes

Source: GAO analysis of IC element documents. | GAO-21-83

<sup>a</sup>We assessed actions IC elements reported taking against leading practices for enhanced and sustained collaboration GAO identified in [GAO-06-15](#). These practices were developed by GAO interviewing experts in coordination, collaboration, partnerships, and networks from the National Academy of Public Administration, the IBM Center for The Business of Government, and the University of California, Berkeley. We determined that ODNI met a practice if they demonstrated one supporting activity or example for that practice.

**Define a common outcome and articulate mutually reinforcing or joint strategies.** The IC EEOD Council has defined common IC diversity outcomes and developed joint strategies, such as the *Enterprise Strategy*, to reinforce such outcomes. In 2015, IC EEOD released the *Enterprise Strategy* to provide a framework for enhancing workforce diversity across the IC. Specifically, the *Enterprise Strategy* lays the foundation for community action and requires a commitment from every member of the IC workforce to acknowledge, embrace, and promote equal employment opportunity, diversity, cultural understanding and sensitivity, and inclusiveness. The *Enterprise Strategy* identifies the following five IC-wide goals: (1) leadership and accountability, (2) workforce development and succession planning, (3) recruitment, hiring, retention, and engagement, (4) career development and advancement, and (5) equal employment opportunity and inclusion. Each goal contains supporting objectives to reinforce the goals and set direction for related policies, programs, and initiatives across the community. For example, as shown in table 4, the leadership and accountability goal includes the following three supporting objectives:

**Table 4: Objectives Supporting Enterprise Strategy Goal 1—Leadership and Accountability**

Objective 1.1	Objective 1.2	Objective 1.3
Implement efforts to hold all IC leaders accountable for advancing equal employment opportunity, diversity, and inclusion and for achieving measurable results	Create opportunities for the exchange of ideas and solutions to challenges among IC equal employment opportunity and diversity professionals.	Collaborate with senior leaders to leverage their positions of leadership and visibility in support of employee resource groups and diversity programs as a means to identify and seek resolution to diversity, inclusion and equal employment opportunity issues in the workforce.

Source: Office of the Director of National Intelligence Enterprise Strategy. | GAO-21-83

IC EEOD mutually reinforces strategies through the IC EEOD Council. The IC EEOD Council leveraged components of prior diversity plans and adopted the *Enterprise Strategy* to guide the IC’s outcomes and strategies. Further, council stakeholders participate in strategic planning sessions and incorporate the diverse perspectives of their leadership, practitioners, human capital and human resources professionals, and other experts into the development and implementation of IC-wide policies, plans, and activities.

**Identify and address needs by leveraging resources.** ODNI IC EEOD is taking several steps to address resource needs and collaboratively leverage resources to support IC diversity planning, recruitment, and outreach activities. According to ODNI officials, available resources

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concentrate on the recruitment and retention of women, racial or ethnic minorities, and persons with disabilities. In particular, IC EEOD is working collaboratively with IC elements to expand recruitment activities with academic institutions, professional organizations, and employee resource groups. In fiscal year 2018, IC EEOD reported that the IC facilitated around 20 engagements including the Hispanic Association of Colleges and Universities Annual Conference, the Korean-American Scientists and Engineering Association Ygnite 2018 Conference, and the National Historically Black Colleges and Universities Week Conference to enhance recruitment. ODNI also hosted the IC EEO and Diversity Professionals' Conference where conference participants engaged with equal employment opportunity and diversity experts from the federal government and private sector to share trends, challenges, and solutions. In addition to annual events, ODNI has assumed sole responsibility for managing the IC's Centers for Academic Excellence Program, which provides grants to institutions with diverse student bodies to train and encourage them to pursue careers in the IC.<sup>51</sup>

ODNI IC EEOD, in coordination with the IC Chief Human Capital Officer, is also supporting the development of new resources to enhance IC-wide hiring of diverse staff, according to IC EEOD officials. For example, the National Security Agency recently created an external application hub called Candidate Experience, previously referred to as the Applicant Gateway, according to National Security Agency officials. This portal allows applicants to apply to jobs in more than one IC element, share their resumes with all partner IC elements, and view the status of their current application, among other features. According to IC EEOD officials, the IC Chief Human Capital Officer is working with the National Security Agency to promote and expand this capability from the current six IC elements to all 17 IC elements.

**Define and agree on roles and responsibilities.** Intelligence Community Directive 110 establishes the roles and responsibilities of the Chief of IC EEOD and establishes the IC EEOD Council. For example, Intelligence Community Directive 110 states that the Chief of IC EEOD shall, on behalf of the Director of National Intelligence, lead the IC EEOD program, to include conducting strategic analysis on equal employment opportunity and diversity issues, and provide assistance on diversity

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<sup>51</sup>For more information on the IC Center for Academic Excellence program, see GAO, *Intelligence Community: Actions Needed to Improve Planning and Oversight of the Centers for Academic Excellence Program*, [GAO-19-529](#) (Washington, D.C.: Aug. 1, 2019).

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training. It also instructs IC element heads to create organization-specific programs that are well-aligned with the guiding principles of the directive and are conducted in close coordination with the IC EEOD. The *Enterprise Strategy* further requires a commitment from every member of the IC workforce to acknowledge, embrace, and promote equal employment opportunity.

**Establish compatible policies, procedures, and other means to operate across agency boundaries.** According to ODNI, IC EEOD periodically develops new IC guidance to address identified policy issues within and across the IC. For example, according to IC EEOD officials, the Compliance Team prepared guidance related to the employment of individuals with disabilities, which supported the development of Intelligence Community Policy Guidance 110.1 in support of Intelligence Community Directive 110.<sup>52</sup> According to IC EEOD officials, IC EEOD also provides informal guidance to IC elements when element-specific policy issues are identified. For example, IC EEOD supported Central Intelligence Agency planning activities in an effort to develop planning activities and policies that will guide the agency's diversity and inclusion strategy.

Frequent communication among agencies is another means to facilitate working across agency boundaries. According to IC EEOD officials, IC EEOD facilitates routine IC-wide communication through virtual tools, coordination events and activities, the IC EEOD Council, and Chief Human Capital Officer meetings. According to responses to our questionnaire:

- Twelve of 17 IC elements report participating in the Chief Human Capital Officer meetings and 10 report participating in recruitment steering committee meetings.
- Fourteen of 17 IC elements report coordinating with IC EEOD on diversity events and activities.
- Fifteen of 17 IC elements report coordinating with IC EEOD through virtual tools to discuss diversity policies, plans, and programs.

**Develop mechanisms to monitor, evaluate, and report on the results.** ODNI IC EEOD's Strategy and Analysis division develops mechanisms to monitor, evaluate, and report on the results of both IC-wide and IC EEOD

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<sup>52</sup>Office of the Director of National Intelligence, Intelligence Community Policy Guidance 110.1: *Employment of Individuals with Disabilities* (Feb. 26, 2019).

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diversity initiatives. Officials note, the division is responsible for developing the IC's annual demographic report which includes aggregated data on demographic trends, hiring, and program accomplishments for IC elements, among other data. Since fiscal year 2015, the annual demographic report has been publicly released to enhance transparency and demonstrate progress. According to IC EEOD officials, the Diversity Outreach division also conducts surveys with IC elements and participants after community events to determine their impact. For example, officials recalled during a past IC recruiting event, a smaller IC element indicated in a survey response that through the event, they were able to identify a number of diverse applicants for the first time. Officials also noted that IC EEOD partners with IC elements, when requested, to support congressional requests that require data and analysis.

**Reinforce individual accountability for collaborative efforts.** The *Enterprise Strategy* recognizes that holding IC leaders accountable strengthens diversity within the IC. To build this accountability, the leaders of all 17 IC elements signed the *Enterprise Strategy* to emphasize their commitment to improving workforce diversity. The *Enterprise Strategy* instructs IC element heads to lead and champion principles and efforts focused on diversity and a culture of accountability. In another example, IC EEOD gained the commitment of the directors across the IC to implement stronger measures to identify and address all forms of discrimination through the signing of a pledge, referred to as "A Pledge to Our People." The pledge includes five steps to address workplace harassment and discrimination. IC leaders are accountable for monitoring the impact of the steps and to make adjustments as necessary.

While IC EEOD is meeting seven of the eight leading practices for enhancing and sustaining diversity collaboration across the IC, IC EEOD has taken limited action to reinforce IC element accountability in achieving IC-wide workforce diversity goals. Specifically, IC EEOD has not established clear implementation objectives and timeframes to hold the IC elements accountable and demonstrate progress towards achieving diversity goals.

**Reinforce agency accountability for collaborative efforts through agency plans and reports.** The *Enterprise Strategy* identifies five overarching goals and 18 objectives to guide collaborative efforts across the IC, but it does not identify implementation objectives and timeframes

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that IC elements should accomplish to demonstrate progress.<sup>53</sup> Specifically, the *Enterprise Strategy's* goals and supporting objectives include broad statements and do not specify tangible steps or timeframes when the steps should be accomplished. For example, the leadership and accountability goal includes supporting objectives to implement efforts to hold IC elements accountable and create opportunities for the exchange and development of solutions, but the objectives do not include specific actionable steps IC elements should take or the timeframes by which the IC elements are to achieve the goal and ensure progress. Building on the *Enterprise Strategy* and related IC guidance, ODNI, in collaboration with the IC elements, developed the *Joint Strategy*, which according to ODNI officials, was publicly released in August 2020. The strategy identifies four IC-wide goals and 16 supporting objectives.<sup>54</sup> However, similar to the *Enterprise Strategy*, the *Joint Strategy's* goals and supporting objectives include broad statements and do not specify tangible steps or timeframes when the steps should be accomplished. For example, under the goal to invest in workforce readiness, there is a supporting objective to communicate beyond performance management systems to facilitate dialogue, relationship building, and expansive networking through a culturally competent lens. The *Joint Strategy* does not indicate how this objective will be achieved or the timeframe by which IC elements should demonstrate corresponding progress.

Intelligence Community Directive 110 states that the Chief of IC EEOD is responsible for leading the IC EEOD program and coordinating on human capital programs and initiatives to promote compliance with equal employment opportunity authorities and consistency with IC diversity guidance. Further, a senior DOD official indicated that ODNI IC EEOD is responsible for leading the IC's diversity efforts and that the development of diversity implementation objectives and timeframes would be appropriate. Additionally, our work has shown that plans can reinforce accountability by aligning agency goals and strategies with those of the

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<sup>53</sup>The *Enterprise Strategy* five goals include (1) Leadership and Accountability, (2) Workforce Development and Succession Planning, (3) Recruitment, Hiring, Retention and Engagement, (4) Career Development and Advancement, and (5) Equal Employment Opportunity and Inclusion.

<sup>54</sup>The *Joint Strategy* four goals include (1) Promote People-Centric Leadership at All Levels, (2) Strengthen Compliance with Laws and Eliminate Discriminatory Behavior, (3) Leverage External Partnerships to Increase Access to Diverse Talent, and (4) Invest in Workforce Readiness.

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collaborative efforts.<sup>55</sup> Further, key practices for establishing a results-oriented culture state that organizations should set implementation goals and a timeframe to build momentum and demonstrate progress over time.<sup>56</sup>

ODNI IC EEOD officials told us that they have undertaken recent efforts to enhance accountability. In particular, the *Joint Strategy* includes some mechanisms by which ODNI can hold the IC elements accountable for progress in achieving jointly created goals, to include information detailing the future use of scorecards to determine whether the strategy tasks are achieved. However, IC EEOD officials indicated the scorecard concept is a new plan and they have not fully utilized scorecards or other tools to enforce accomplishment of agreed upon initiatives and policy enforcement. Further, officials said they are reluctant to set specific implementation goals for enhancing diversity programs and policies within each IC element, such as establishing diversity performance measures for managers, and timeframes for IC elements to accomplish the jointly created goals because they think they do not have the authority to unilaterally do so. However, as previously noted, Intelligence Community Directive 110 establishes authority for the Chief of ODNI IC EEOD to lead the IC-EEOD program. As previously noted, most IC elements are not taking steps to address two of nine leading practices for diversity management related to strategic planning and measurement. Until ODNI establishes timeframes for IC elements to implement goals and demonstrate progress toward improving workforce diversity, the IC risks not achieving IC-wide diversity goals, such as those articulated in the *Enterprise Strategy* and the *Joint Strategy*, and demonstrating minimal progress.

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## Conclusions

A diverse workforce that transcends race, color, age, and sex, among others, is critical to maintaining national security, according to senior IC leaders. Over the past several years, the IC has demonstrated its commitment to diversity by taking steps to increase the proportion of women, racial or ethnic minorities, and persons with disabilities within the IC workforce. Although some progress has been made in increasing this representation throughout the IC, representation remains below comparable benchmarks.

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<sup>55</sup>[GAO-06-15](#).

<sup>56</sup>[GAO-03-669](#).

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IC elements are taking steps to address leading practices for managing a diverse workforce, but not all IC elements have developed current and complete diversity strategic plans, or utilized performance measures to assess progress toward achieving diversity goals. Without doing so, IC elements risk investing in ineffective diversity efforts that do not align with current or future needs, and may lack an understanding of progress made toward achieving diversity goals. In addition, IC elements are taking steps to identify barriers to workforce diversity, but not all IC elements complete required barrier assessments. Without routinely completing barrier assessments, IC elements may not identify existing or potential barriers at the element level and may miss opportunities to eliminate barriers.

The Chief of IC EEOD is responsible for leading the IC's EEOD program and serving as the principal advisor to the Director of National Intelligence and IC senior leaders on issues related to equity, fairness, diversity, and inclusion. IC EEOD has taken numerous steps to coordinate and enhance IC workforce diversity such as developing a strategy and framework to guide IC-wide programs and policies. However, ODNI has not established actionable steps or timeframes for IC elements to achieve diversity-related implementation objectives to hold them accountable for progress in achieving identified goals. ODNI asserts it cannot unilaterally create or require IC elements to meet implementation objectives, however, it acknowledges that ODNI can guide IC elements in implementing jointly created objectives with agreed upon timeframes. Without establishing specific implementation objectives with actionable steps and agreed upon timeframes to achieve implementation objectives, ODNI risks not holding IC elements accountable for making progress in improving diversity representation. Further, the IC risks not addressing key diversity goals and objectives, such as those articulated in the current *Enterprise Strategy* and *Joint Strategy*, and demonstrating minimal progress in overall workforce diversity.

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## Recommendations for Executive Action

We are making the following seven recommendations to the Director of National Intelligence:

The Director of National Intelligence, in consultation with the department secretary or head of the IC element, as appropriate, and consistent with the Director of National Intelligence's authority, should issue new or update existing guidance to require all IC elements to maintain current and complete diversity strategic plans that contain specific objectives, timeframes, and responsibilities. (Recommendation 1)



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The Director of National Intelligence, in consultation with the department secretary or head of the IC element, as appropriate, and consistent with the Director of National Intelligence's authority, should ensure that IC elements are making progress toward maintaining current and complete diversity strategic plans. (Recommendation 2)

The Director of National Intelligence, in consultation with the department secretary or head of the IC element, as appropriate, and consistent with the Director of National Intelligence's authority, should issue new or update existing guidance to ensure that IC elements develop performance measures to assess the contribution of activities toward achieving diversity goals and overall progress. (Recommendation 3)

The Director of National Intelligence, in consultation with the department secretary or head of the IC element, as appropriate, and consistent with the Director of National Intelligence's authority, should ensure that IC elements are making progress toward developing measures to assess progress toward achieving diversity management efforts. (Recommendation 4)

The Director of National Intelligence, in consultation with the department secretary or head of the IC element, as appropriate, and consistent with the Director of National Intelligence's authority, should issue new or update existing guidance to ensure that each IC element routinely identifies and takes steps toward eliminating barriers to workforce diversity. (Recommendation 5)

The Director of National Intelligence, in consultation with the department secretary or head of the IC element, as appropriate, and consistent with the Director of National Intelligence's authority, should ensure that IC elements are routinely completing required assessments to identify and eliminate barriers. (Recommendation 6)

The Director of National Intelligence, in consultation with the department secretary or head of the IC element, as appropriate, and consistent with the Director of National Intelligence's authority, should establish specific implementation objectives and timeframes for the IC elements that support IC-wide diversity goals to ensure IC elements are held accountable for making progress. (Recommendation 7)

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## Agency Comments and Our Evaluation

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We provided a draft of this report to ODNI for review and comment. In written comments, ODNI noted that notwithstanding their comments, ODNI concurred with all seven of our recommendations. ODNI's comments are summarized below and reprinted in their entirety in appendix III. In addition, we provided a draft of this report to the Central Intelligence Agency, Department of Homeland Security, Department of State, Department of Energy, Department of Treasury, DOD, National Reconnaissance Office, National Security Agency, EEOC, and OPM for review. These agencies did not provide additional comments on the draft report. NSA and EEOC provided technical comments, which we incorporated as appropriate.

In its comments on our report, ODNI raised two points for consideration. First, regarding the development of workforce diversity implementation objectives and timeframes, ODNI stated that specific and time-bound initiatives have been developed but are not publicly available. ODNI stated that these initiatives are internal working documents that follow progress review templates specified in the August 2020 *Joint Strategy*. However, ODNI did not provide us with this information during the course of our audit work, and did not provide supporting documentation with its written comments on our report. ODNI officials previously noted that the *Joint Strategy* included mechanisms to help hold IC elements accountable for progress in achieving jointly created goals, to include information detailing the future use of scorecards. However, in December 2020, ODNI officials told us that the scorecard concept was new and IC EEOC has not fully utilized scorecards or other tools to help ensure accountability regarding initiatives and goals. Moreover, it is not clear that ODNI plans to use these scorecards for all IC workforce diversity goals and initiatives. Specifically, ODNI officials noted that while the scorecards are intended to assess the objectives and goals identified in the *Joint Strategy*, the IC has not collectively determined which objectives and goals, if any, will be assessed in future scorecards.

Therefore, we continue to believe that our recommendation to establish specific implementation objectives and timeframes for the IC elements that support IC-wide workforce diversity goals is warranted and will help ensure IC elements are held accountable for making progress. As stated in the report, establishing a results-oriented culture is based on setting implementation goals and a timeframe to demonstrate progress over

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time, and that more work needs to be done in this area—specifically agreeing on implementation objectives, timeframes, and associated processes and tools to support the objectives and timeframes—for ODNI to fully implement our recommendation. Additionally, when possible, sharing these objectives and timeframes with key stakeholders, such as relevant congressional committees, can help further ensure accountability and transparency for demonstrating improved workforce diversity policies and programs.

Second, ODNI stated in its comments that Intelligence Community Directive 110 is limited by the Director of National Intelligence’s statutory authority. Therefore, ODNI does not interpret it as authorizing the Chief of IC EEOD to direct aspects of independent IC elements’ diversity programs, nor drive accountability for resource decisions, personnel practices, hiring, promotions, or other aspects of IC elements’ diversity programs. ODNI also noted that IC EEOD has authority over IC elements on certain diversity related matters, such as tasking IC elements for data and ensuring interagency collaboration toward jointly established IC priorities.

We agree that Intelligence Community Directive 110 is limited by the Director of National Intelligence’s statutory authority. However, we believe that the Director of National Intelligence has sufficient authority to develop, lead, and coordinate workforce diversity policies and programs across the IC—to include implementation of our recommendations—and that IC EEOD has been exercising this authority in its leadership of IC workforce diversity efforts. For example, Intelligence Community Directive 110 states that the Chief of IC EEOD shall, on behalf of the Director of National Intelligence, coordinate IC human capital programs and initiatives to promote compliance with equal employment opportunity authorities and consistency with IC diversity guidance, among others. Further, as Chair of the IC EEOD Council, the Chief of IC EEOD is responsible for working across the IC to collaboratively coordinate, evaluate, and improve equal employment and opportunity matters. The Director of National Intelligence also has the authority to lead the formulation, justification, execution, and performance evaluation of the National Intelligence Program budget to ensure that it meets his or her goals, objectives, and priorities for the IC, as identified in the National Intelligence Strategy. Our recommendations note that they should be implemented in consultation with relevant IC element heads and consistent with the Director of National Intelligence’s authority. Furthermore, the Director of National Intelligence identified developing a diverse and inclusive workforce as an objective in the 2019 National

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Intelligence Strategy. Therefore, we continue to believe our recommendations are consistent with the Director of National Intelligence's authorities and guidance.

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We are sending copies of this report to the appropriate congressional committees. We are also sending copies to the Secretaries of Defense, Energy, Homeland Security, State, and Treasury; the Directors of National Intelligence, Defense Intelligence Agency, Central Intelligence Agency, National Geospatial-Intelligence Agency, National Reconnaissance Office, and National Security Agency; and the Attorney General. In addition, this report will be available at no charge on our website at <http://www.gao.gov>.

If you or your staff have any questions concerning this report, please contact Brian M. Mazanec at (202) 512-5130 or [mazanecb@gao.gov](mailto:mazanecb@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.

A handwritten signature in black ink, appearing to read "Brian M. Mazanec". The signature is fluid and cursive, with the first name "Brian" and last name "Mazanec" clearly distinguishable.

Brian M. Mazanec  
Director, Defense Capabilities and Management

# Appendix I: GAO Assessment of Intelligence Community Elements' Efforts to Identify Barriers to Workforce Diversity

From fiscal year 2016 through 2018, eight of 17 IC elements analyzed data, such as workforce data, related policies and procedures that may trigger barriers to diversity, and data from internal and external surveys and independent IC element study results, among other things. We reviewed annual assessments in which IC elements identified barriers, including annual Management Directive 715 (MD-715) reports. We found each of the eight IC elements included plans to address identified barriers, as shown in table 5 below.

**Table 5: Steps Intelligence Community Elements Have Taken to Identify and Address Barriers to Workforce Diversity from Fiscal Years 2016 through 2018**

Element	Condition identified as a trigger for a potential barrier to diversity	Barrier analysis summary	Steps to address potential or identified barrier
Office of the Director of National Intelligence	Low representation of Hispanics compared to the Civilian Labor Force	In Management Directive 715 (MD-715) reports for fiscal years 2016 through 2018, the element identified low representation of Hispanics. The element assessed workforce data, including participation in promotions, hiring, and awards. The element noted Hispanic representation in leadership positions is also lacking based on additional review of workforce data, climate surveys, focus groups, and interviews.	Identified the Chief Intelligence Community Equal Employment Opportunity and Diversity (IC EEOD), IC Chief Human Capital Office, and Mission Support Division-Human Resources, as responsible for continuing evaluation of Hispanic participation as part of an IC-wide barrier assessment. Further, the element identified continued work with the Hispanic employee resource group, other mission elements, the Human Resource office, and Chief Human Capital Office to enhance Hispanic outreach by September 2016. In fiscal year 2017, the element added other actions to take to increase representation of Hispanics, including holding an annual summit to develop educational and developmental opportunities by December 2020.
	Low representation of individuals with disabilities and targeted disabilities	In MD-715 reports for fiscal years 2016 and 2017, the element identified low representation of individuals with disabilities and targeted disabilities. The element assessed workforce data and conducted focused interviews across the IC. The element determined additional efforts are needed to enhance data available on persons with disabilities for a barrier analysis.	Identified the Chief IC EEOD and the Mission Support Division-Human Resources as responsible for ensuring enhanced recruitment of individuals with disabilities and targeted disabilities. Among other things, the element also identified developing additional external partnerships to enhance recruitment and ensure element policies and behaviors are inclusive by September 2017. In the MD-715 report for fiscal year 2017, the element determined the Chief IC EEOD will be responsible for continued review of agency-wide policies and processes to identify barriers.

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<b>Element</b>	<b>Condition identified as a trigger for a potential barrier to diversity</b>	<b>Barrier analysis summary</b>	<b>Steps to address potential or identified barrier</b>
	Low representation of women compared to the Civilian Labor Force	In MD-715 reports for fiscal years 2016 and 2017, the element identified low representation of women compared to the Civilian Labor Force. The element reviewed workforce data, including representation and participation in hiring, promotions, and career development programs.	Identified the Chief IC EEOD and the Mission Support Division-Human Resources as responsible for monitoring representation of women in the workforce, including hiring and retention by September 2017. The element reported the Chief IC EEOD will continue to oversee monitoring representation of women.
	Low representation of American Indian or Alaska Native demographic group compared to the Civilian Labor Force	In the MD-715 report for fiscal year 2018, the element identified low representation of American Indians or Alaska Natives compared to the Civilian Labor Force. The element assessed workforce data.	No steps identified.
	Low representation of minorities in leadership positions	In the MD-715 report for fiscal year 2018, the element identified low representation of minorities in leadership positions. The element assessed workforce data.	No steps identified.
	Low representation of women in leadership positions	In the MD-715 report for fiscal year 2018, the element identified low representation of women in leadership positions. The element assessed workforce data.	No steps identified.
Central Intelligence Agency <sup>a</sup>	Underrepresentation of individuals with targeted disabilities compared to the Civilian Labor Force	In the MD-715 report for fiscal year 2016, the element identified underrepresentation of individuals with targeted disabilities compared to the Civilian Labor Force. The element reviewed workforce data, and determined underrepresentation remained below the federal goal.	Identified the Diversity and Inclusion Office and Talent Acquisition Group as responsible for creating and executing an outreach and recruitment strategy for individuals with disabilities by October 2019.
	Underrepresentation of Hispanic and Latino employees compared to the Civilian Labor Force	In the MD-715 report for fiscal year 2016, the element identified underrepresentation of Hispanic and Latino employees compared to the Civilian Labor Force. The element assessed workforce data, and determined representation of male and female Hispanic and Latino employees remained below the benchmark.	Identified the Talent Acquisition Group as responsible for increasing the number of Hispanic employees by September 2016.

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<b>Element</b>	<b>Condition identified as a trigger for a potential barrier to diversity</b>	<b>Barrier analysis summary</b>	<b>Steps to address potential or identified barrier</b>
	Underrepresentation of diverse employees in the leadership position pipeline	In the MD-715 report for fiscal year 2016, the element identified underrepresentation of diverse employees in the leadership position pipeline. The element assessed workforce data and determined there was a slight change in the Hispanic population, with an increase in females and a decrease in males.	Identified the Diversity and Inclusion Office and the Talent Acquisition Group as responsible for reviewing and adjusting recruitment efforts to increase the number of Hispanic and Latino employees by April 2017. The element also identified implementation of a multi-year strategy to address outreach to academic institutions and professional organizations by October 2020.
Defense Intelligence Agency	Declining representation of women in senior levels	In MD-715 reports for fiscal years 2016 and 2017, the element identified declining representation of women in senior levels. The element identified barriers to increasing the representation of women, including preference for military experience, lack of targeted recruitment and career development, and limited access to data related to career development and exit surveys.	Identified equal employment opportunity and diversity office and human resource officials to oversee the plan and steps to complete by September 2017. In the MD-715 report for fiscal year 2017, the element eliminated the barrier.
	Declining representation of women in senior level feeder pools	In the MD-715 report for fiscal year 2017, the element identified declining representation of women in senior level feeder pools. The element assessed representation in onboarding data and across the employee lifecycle, and internal studies.	Identified equal employment opportunity and diversity office, human resource, and Academy of Defense Intelligence officials to oversee implementation of the new Rank-In-Person system, continue using a new talent acquisition tool to identify diverse academic institutions for recruitment, continue tracking individuals applying for career broadening programs and new hire and exit survey data, and continue education of managers on family-friendly policies by September 2020.
	Underrepresentation of women in intelligence series	In MD-715 reports for fiscal years 2016 through 2018, the element identified underrepresentation of women in intelligence series. The element reviewed the related job series and hiring data, and internal studies. As a result of reviewing an Inspector General report, human resource barrier analysis, and employee interviews, the element identified its decentralized recruitment had a negative impact on setting and measuring pipeline goals, and implementing and assessing a recruitment strategy.	Identified human resource officials to oversee the plan and steps to complete by September 2017. After implementing a new Rank-in-Person system, the element shifted its recruitment strategy to modify knowledge, skills, and abilities required for career fields. The element added equal employment opportunity and diversity office and career development officials to oversee the plan and modified steps to complete by September 2020.

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<b>Element</b>	<b>Condition identified as a trigger for a potential barrier to diversity</b>	<b>Barrier analysis summary</b>	<b>Steps to address potential or identified barrier</b>
	Underrepresentation of individuals with targeted disabilities	In the MD-715 report for fiscal year 2016, the element identified underrepresentation of individuals with targeted disabilities. The element reviewed disability workforce distribution rates, participation in major occupations, and hiring data. The element identified that it did not use Schedule A hiring authority as a Title X entity, and determined increased and targeted recruitment efforts will address the potential barrier.	Identified equal employment opportunity and diversity office and human resource officials to oversee the plan to implement a new hiring policy, strengthen education and awareness practices to hold managers accountable, and collect data with an updated form by September 2017.
	Underrepresentation of minorities in senior levels	In MD-715 reports for fiscal years 2016 and 2017, the element identified underrepresentation of minorities in senior levels. The Equal Employment Opportunity Commission conducted a site visit in fiscal year 2016 and identified a barrier for African American males in achieving senior levels that the element later broadened to all minorities. The element identified a barrier in the participation and selection of minorities in training and career development programs, which the element reported are critical to advancement to senior level positions.	Identified equal employment opportunity and diversity office and human resource officials to implement a new Rank-in-Person system and related steps to complete by September 2017. The element did not eliminate the barrier and amended plans for fiscal year 2018.
	Underrepresentation of Hispanics	In MD-715 reports for fiscal year 2016 and 2017, the element identified underrepresentation of Hispanics. The element determined targeted recruitment practices would address the condition. However, the element later determined these efforts were insufficient.	Identified equal employment opportunity and diversity office and human resource officials to use a new talent acquisition tool for recruitment efforts by September 2017. The element did not eliminate the barrier and amended plans for fiscal year 2018.



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<b>Element</b>	<b>Condition identified as a trigger for a potential barrier to diversity</b>	<b>Barrier analysis summary</b>	<b>Steps to address potential or identified barrier</b>
	Underrepresentation of women and minorities in headquarters versus Combatant Commands	In MD-715 reports for fiscal years 2016 and 2017, the element identified underrepresentation of women and minorities in headquarters versus Combatant Commands. The element stated it had not fully assessed the impact of its structure to uncover a potential barrier, but reported local hiring likely impacts minority representation. The element reported its global rotational assignments may address the potential barrier.	Identified equal employment opportunity and diversity office and human resource officials that will conduct further analysis by September 2017. The element determined that representation rates do not indicate a potential barrier, and enhanced communication between equal employment opportunity and diversity office and the office of human resource resources.
	Lower application and selection rates for various racial, ethnic, and gender groups for career broadening training opportunities	In the MD-715 report for fiscal year 2018, the element identified lower application and selection rates for various racial, ethnic, and gender groups for career broadening training opportunities. Based on interviews, the element determined data on certifications, individual development plans, and joint duty applications are maintained on disparate databases that lack a common identifier. Data on interest in career broadening training opportunities are also not tracked.	Identified human resource, equal employment opportunity and diversity office, career broadening training opportunities, and career development officers to oversee the plan to develop and implement a structured approach for reviewing and evaluating the career broadening training opportunities process, including a central application system, by September 2021.
	Lower hiring rates of African American and Asian applicants into intelligence series	In the MD-715 report for fiscal year 2018, the element identified lower hiring rates of African American and Asian applicants into the intelligence series. The element determined that human resource lacks resources to ensure the hiring process is standardized based on interviews and barrier analysis questionnaire responses.	Identified human resource, equal employment opportunity and diversity office, and career field officials to oversee the plan to standardize hiring practices and compliance mechanisms by September 2021.

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<b>Element</b>	<b>Condition identified as a trigger for a potential barrier to diversity</b>	<b>Barrier analysis summary</b>	<b>Steps to address potential or identified barrier</b>
	Underrepresentation of females and minorities in senior level feeder pools	In the MD-715 report for fiscal year 2018, the element identified underrepresentation of females and minorities in senior level feeder pools. The element assessed applicant pool data, and determined African American women were less likely to be promoted. After review of data from its promotion program evaluation and workforce engagement survey, the element determined the promotion process requires a more detailed standard for evaluation.	Identified human resource, equal employment opportunity and diversity office, and Academy for Defense Intelligence officials to oversee the plan and related steps to evaluate and refine the promotion process by September 2022.
National Security Agency	Representation of individuals with targeted disabilities below federal goal	In MD-715 reports for fiscal years 2016 and 2017, the element identified representation of individuals with targeted disabilities fell below the federal goal. The element reviewed recruitment and hiring practices, including outreach procedures for potential candidates. The element identified that such persons do not apply or are not selected at rates to meet the federal goal.	Identified the Chiefs of the Recruitment Office, Reasonable Accommodations and Accessibility Office, Office of Military Personnel, and Equal Employment Opportunity and Diversity Disability Employment Strategist to oversee plans to identify a larger pool of candidates, and build relationships with state, local, and community organizations and academic institutions by September 2017. The element later removed the barrier.
	Assessment scores and related bonus award rates appear uneven across certain minorities and women	In MD-715 reports for fiscal years 2016 through 2018, the element identified uneven assessment scores and related bonus award rates across certain minorities and women. The element interviewed the policy team on the method used to calculate scores and bonuses, and reviewed bonus procedures and the online system that compares the related scores. The element found certain minorities and women were not awarded bonuses at the same rate as non-minority and male employees by monetary values; however, women received a higher frequency of bonuses.	Identified the Equal Employment Opportunity and Diversity Director, Senior Advisor to the Director of Equality to have the bonus distribution reflect the composition of the workforce at all levels by December 2019. In fiscal year 2017, the element began implementation of 24 recommendations made by its Equality Task Force, and planned to address the potential barrier by October 2019. A new construct for performance recognition was built in 2018, and in fiscal year 2018, the element ended the bonus award program.

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Element	Condition identified as a trigger for a potential barrier to diversity	Barrier analysis summary	Steps to address potential or identified barrier
	Low promotion rates of certain groups appear uneven compared to representation	In MD-715 reports for fiscal years 2016 through 2018, the element identified low promotion rates of certain groups appeared uneven compared to representation. The element studied promotion data, and determined that when adjusting for performance, there was a potential disparity of promotion rates related to employee age, and rates decline as tenure and grade increased.	Identified the Strategy and Analysis Chief to conduct a study on promotions by July 2016. The element reported that a new performance metric system will be in place by 2018 and promotion rates through that system will be revisited. In the MD-715 report for fiscal year 2018, the element reported a new system was in the implementation stage.
	Representation of certain groups appear uneven compared to the Civilian Labor Force	In MD-715 reports for fiscal years 2016 and 2017, the element identified representation of certain groups appeared uneven compared to the Civilian Labor Force. The element identified that representation of some groups fell below the Civilian Labor Force.	Identified the Strategy and Analysis Chief to build a link between the Department of Labor and element work roles by August 2016. The element also planned to share the relationship between certain roles that link with National Security Agency roles with leadership and related hiring authorities by September 2017.
	Low promotion rates from general grade 12 to general grade 13 for minorities, women, persons with disabilities, and those in the 40 and over age group	In the MD-715 report for fiscal year 2018, the element identified low promotion rates from general grade 12 to general grade 13 for minorities, women, and persons with disabilities, with the greatest gap for those in the 40 and over age group. The element identified a new barrier and determined promotion rates were lower at general grade 12 and general grade 13 levels for certain groups, and promotion rates were uneven across certain groups. Beginning at general grade 12, the element determined there was a lack of progression for minorities and persons with disabilities, with the greatest barrier for those age 40 and over.	The element determined it will complete a study on promotion rates for general grade 12 employees seeking general grade 13 levels with a focus on age as a barrier by September 2020.

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<b>Element</b>	<b>Condition identified as a trigger for a potential barrier to diversity</b>	<b>Barrier analysis summary</b>	<b>Steps to address potential or identified barrier</b>
National Geospatial-Intelligence Agency	High female share of attrition compared to representation	In MD-715 reports for fiscal years 2016 and 2017, the element identified a high share of female attrition compared to representation. The element completed an internal study on female representation and the fiscal year 2016 Special Emphasis Programs' Diversity and Inclusion Implementation Plans. The element also established Lean-In Circles to identify workplace inequities.	Identified the Office of Diversity Management and Equal Employment Opportunity Deputy Director to oversee the plan to analyze results from a focus group to develop solutions to address the barrier, roundtables to discuss retention challenges, and complete a study on female attrition by September 2017. The element modified the timeframe for the plan to July 2019, including rewarding participation of senior leaders in networking events.
	Low representation of women and Hispanics compared to the Civilian Labor Force	In MD-715 reports for fiscal years 2016 and 2017, the element identified low representation of women and Hispanics compared to the Civilian Labor Force. The element completed additional analysis and determined insufficient barrier analysis in previous years resulted in premature remedies. The element identified policies related to quality of life, alternative work options, and recruitment most likely led to the potential barrier.	Identified the Office of Diversity Management and Equal Employment Opportunity Deputy Director to oversee the development of a recruitment plan for women and Hispanics, finalize the barrier analysis on Hispanic advancement and retention, and continuation of Lean-In Circles, among other things, by September 2017. The element identified the same challenge in fiscal year 2017, and revised steps to be complete by September 2018.
	Low promotion rates of African Americans compared to representation	In MD-715 reports for fiscal years 2016 through 2018, the element identified low promotion rates of African Americans compared to representation. In addition to analyzing workforce data, the element spearheaded a study on minority promotions. In fiscal year 2017, the element completed the study and analyzed workforce data, including promotion trends, employee survey results from focus groups and interviews, and private and public sector best practices. The element identified barriers. In the MD-715 report for fiscal year 2018, the element reported that it planned to implement recommendations from the study.	Identified the Office of Diversity Management and Equal Employment Opportunity Research Psychologist Study Lead to oversee the plan to complete the study, and other steps including training senior leaders and hiring and promotion panelists on diversity, implementing an applicant data system, and utilizing a new recruitment strategy by September 2017. After the study was complete, the Office of Diversity Management and Equal Employment Opportunity Director was responsible for overseeing implementation of recommendations by October 2018. In the MD-715 report for fiscal year 2018, the element also identified the Human Development Directorate Director as responsible for assisting with implementing recommendations through fiscal year 2023.

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<b>Element</b>	<b>Condition identified as a trigger for a potential barrier to diversity</b>	<b>Barrier analysis summary</b>	<b>Steps to address potential or identified barrier</b>
U.S. Navy Intelligence	Low representation of women in the workforce, senior levels, and intelligence series	In MD-715 reports for fiscal years 2016 through 2018, the element identified low representation of women in the workforce, senior levels, and intelligence series. The element was unable to determine a trigger to the barrier of low representation of women in the intelligence series. In addition, the element reviewed trends and determined there had been no increase in women in senior levels despite organizational changes. The element determined there may be a disparity in mentoring and developmental support for women interested in senior levels compared to other elements. The element assessed workforce, recruitment, and complaint data, and determined there was no barrier in recruiting, hiring, promoting, and retaining women.	Identified Human Resource, Civilian Intelligence Personnel Office, Command Deputy, Equal Employment Opportunity and Diversity Office, and Diversity and Inclusion Council officials to oversee the plan to develop more training for employees seeking higher grades and enhanced mentoring opportunities, among other steps, by September 2017. In the MD-715 report for fiscal year 2017, the element identified Human Resource, Command Deputy, and Equal Employment Opportunity and Diversity Office officials to oversee the plan to increase qualified women in the applicant pool for vacancies and promotions in occupational groups and senior levels by September 2017. The plan includes implementing a training plan for managers and hosting workshops that provide resources to discuss best practices for career progression. In the MD-715 report for fiscal year 2018, the element revised the dates to complete steps to September 2019.
	Low representation of Hispanics in the workforce and across all occupation series	In MD-715 reports for fiscal years 2016 through 2018, the element identified low representation of Hispanics in the workforce across all occupation series. The element assessed workforce data and determined there was a lack of focus on steps designed to increase Hispanic and Latino applicants for external hires. The element later identified low representation of Hispanic males after assessing workforce, recruitment, and complaint data.	Identified Human Resource, Civilian Intelligence Personnel Office, Command Deputy, Equal Employment Opportunity and Diversity Office, and Diversity and Inclusion Council officials to oversee the plan to identify and recruit at academic institutions with high enrollment of Hispanic and Latino students and increase the related applicant pool, among other steps, by April 2016. In the MD-715 report for fiscal year 2017, the element identified Human Resource, Command Deputy, Equal Employment Opportunity and Diversity Office officials to oversee the plan to increase the percentage of qualified Hispanic males in the applicant pool, including training against attitudinal biases, by September 2017. In the MD-715 report for fiscal year 2018, the element revised the dates to complete steps to September 2019.

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<b>Element</b>	<b>Condition identified as a trigger for a potential barrier to diversity</b>	<b>Barrier analysis summary</b>	<b>Steps to address potential or identified barrier</b>
	Low representation of Asian females in the workforce and senior levels	In the MD-715 report for fiscal year 2016, the element identified low representation of Asian females in the workforce and senior levels. The element assessed workforce data and determined a lack of available data, including exit surveys and applicant versus new hire data. The element determined it was not aligning current promotion initiatives, including mentoring and career development programs, to include Asian females.	Identified Human Resource, Civilian Intelligence Personnel Office, Command Deputy, Equal Employment Opportunity and Diversity Office, and Diversity and Inclusion Council officials to oversee the plan to align and market promotion initiatives and address climate survey findings, among other things, by June 2016.
	Low representation of individuals with disabilities and individuals with targeted disabilities	In MD-715 reports for fiscal years 2016 through 2018, the element identified low representation of individuals with disabilities and individuals with targeted disabilities. The element assessed workforce and hiring data, and determined there appeared to be unconscious bias among civilian and military hiring managers toward these individuals. In addition, the element addressed an institutional barrier of not utilizing Schedule A hiring authority in the previous fiscal year and subsequently issued a 12-month direct hire authority. In the MD-715 report for fiscal year 2017, the element identified the barrier as a lack of recruiting, hiring, and retaining individuals with disabilities and targeted disabilities.	Identified Human Resource, Command Deputy, Equal Employment Opportunity and Diversity Office officials to oversee the plan to increase awareness of hiring initiatives and of unconscious bias toward individuals with disabilities by September 2016. The element revised dates to September 2017 and later to September 2019.
U.S. Army Intelligence	Decline in representation of women in the workforce compared to the Civilian Labor Force	In MD-715 reports for fiscal years 2016 through 2018, the element identified a decline in the representation of women in the workforce compared to the Civilian Labor Force. The element assessed workforce and separation data, conducted focus groups, and reviewed hiring processes, recruitment practices, and other data. The element determined the recruitment and hiring process, and other related policies (e.g. workplace flexibilities) for women were insufficient.	Identified the Equal Employment Opportunity Director, the Director of Civilian Human Resources, and Commanding General as responsible for increasing the number of women in the workforce by September 2018. The element revised the completion date to September 2020.

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<b>Element</b>	<b>Condition identified as a trigger for a potential barrier to diversity</b>	<b>Barrier analysis summary</b>	<b>Steps to address potential or identified barrier</b>
	Representation of individuals with targeted disabilities lower than federal goal	In MD-715 reports for fiscal years 2016 and 2017, the element identified representation of individuals with targeted disabilities was lower than the federal goal. The element assessed workforce data. The element determined that lack of awareness of and reluctance for self-reporting a disability, among other things, created challenges.	Identified the Equal Employment Opportunity Director, the Director of Civilian Human Resources, managers, supervisors, and Commanding General as responsible for increasing the number of employees with disabilities, including targeted disabilities, that are recruited, hired, and retained by September 2018. The element later revised the completion date to September 2020.
	Low representation of Hispanic and Latino men and women in the workforce compared to the Civilian Labor Force	In MD-715 reports for fiscal years 2016 through 2018, the element identified low representation of Hispanic and Latino men and women in the workforce compared to the Civilian Labor Force. The element assessed workforce data and exit survey responses. The element determined it will complete a climate survey by November 2018. The element identified barriers including requiring applicants to be U.S. citizens with the ability to acquire a certain security clearance, and attitudinal language barriers, among others.	Identified the Equal Employment Opportunity Director, the Director of Civilian Human Resources, hiring officials, and Commanding General as responsible for increasing the number of Hispanics in the workforce by September 2019. In the MD-715 report for fiscal year 2017, the element revised the completion date to September 2020. In the MD-715 report for fiscal year 2018, the element also identified the Equal Employment Opportunity Director as responsible for developing a strategic plan for increasing recruitment, attaining additional authorization, and overseeing plans to target recruitment of Hispanic and Latino men and women by September 2022, among others.
Federal Bureau of Investigation's National Security Branch	Declining representation of Hispanics in hiring compared to Civilian Labor Force	In MD-715 reports for fiscal year 2016 through 2018, the element identified declining representation of Hispanics in hiring compared to the Civilian Labor Force. The element assessed hiring data trends in its MD-715 and Federal Equal Opportunity Recruitment Program submissions. The element believes that geographic location and recruitment may contribute to the potential barrier.	Identified the Assistant Director of the Human Resources Division as responsible for developing a strategy to better assess hiring trends and inform a Hispanic recruitment strategy by September 2015. The element later added improving the existing equal employment opportunity program to include targeted collegiate recruitment and employee development, among other things, by January 2020. In the MD-715 report for fiscal year 2018, the element added the Office of Diversity and Inclusion Section Chief as responsible for completing an employee lifecycle barrier analysis by December 2020.

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Element	Condition identified as a trigger for a potential barrier to diversity	Barrier analysis summary	Steps to address potential or identified barrier
	High representation of African Americans in lower-grade positions	In MD-715 reports for fiscal years 2016 through 2018, the element identified high representation of African Americans in lower-grade positions. The element assessed workforce data, but was unable to determine a trigger and planned to conduct more studies.	Identified the Assistant Director of the Human Resources Division as responsible for completing the study by September 2015. In the MD-715 report for fiscal year 2017, the element added improving the existing equal employment opportunity program to include targeted collegiate recruitment and employee development, among other things, by January 2020. In the MD-715 report for fiscal year 2018, the element added the Office of Diversity and Inclusion Section Chief as responsible for completing an employee lifecycle barrier analysis by December 2020.
	Disparity in pass rates on the Special Agent Selection exams for White and Minority Candidates	In MD-715 reports for fiscal years 2016 through 2018, the element identified disparities in pass rates on the Special Agent Selection exams for White and Minority candidates. The element assessed Special Agent applicant data. The element determined a combination of certain factors, including skills and college majors, yielded higher minority pass rates.	Identified the Assistant Director of the Human Resources Division as responsible for completing a study on challenges related to Phase I and Phase II of the assessment by September 2015. In the MD-715 report for fiscal year 2017, the element added improving the existing equal employment opportunity program to include targeted collegiate recruitment and employee development, among other things, by January 2020. In the MD-715 report for fiscal year 2018, the element added the Office of Diversity and Inclusion Section Chief as responsible for building on the existing analysis, and assessing the impact of new targeted recruitment efforts.
	Low participation rates of women in senior levels of Special Agent and professional positions	In MD-715 reports for fiscal years 2016 through 2018, the element identified low participation rates of women in senior levels of Special Agent and professional positions. The element reviewed promotion data, particularly for SES candidates, and reviewed onboarding data at all levels. The element determined triggers for the potential barrier included low representation of women in Special Agent positions, limited availability of part-time positions, and limited ability for women to relocate for developmental/high-level assignments.	Identified the Deputy Director of the Federal Bureau of Investigation and the Equal Employment Opportunity Officer as responsible for improving opportunities for women to compete for promotion by September 2017. In the MD-715 report for fiscal year 2017, the element added improving the existing equal employment opportunity program to include targeted collegiate recruitment and employee development, among other things, by January 2020. In the MD-715 report for fiscal year 2018, the element added the Office of Diversity and Inclusion Section Chief as responsible for completing an employee lifecycle barrier analysis by December 2020.

Source: GAO analysis of IC element documents. | GAO-21-83

<sup>3</sup>Barriers identified from the Central Intelligence Agency are compiled from the MD-715 report for fiscal year 2016. MD-715 reports are submitted annually by federal agencies to the Equal Employment Opportunity Commission which documents an agency's efforts to continually work toward preventing all forms of discrimination and eliminating barriers that may impede free and open competition in the workplace.



# Appendix II: GAO Assessment of Intelligence Community Elements' Efforts to Meet Leading Practices for Workforce Diversity Management

In table 6, we provide our assessment of the number of steps the IC elements report taking to implement our nine leading practices for diversity management.<sup>1</sup>

**Table 6: Number of Steps Intelligence Community Elements Report Taking to Implement Leading Practices for Workforce Diversity Management as of August 2020**

Element	Leadership commitment (5) <sup>a</sup>	Recruitment (4) <sup>a</sup>	Employee involvement (5) <sup>a</sup>	Diversity training (6) <sup>a</sup>	Performance (4) <sup>a</sup>	Succession planning (4) <sup>a</sup>	Accountability (3) <sup>a</sup>	Strategic planning (2) <sup>a</sup>	Measurement (8) <sup>a</sup>
Office of the Director of National Intelligence	Multiple	Multiple	Multiple	Multiple	Multiple	Multiple	Multiple	One	Multiple
Central Intelligence Agency	Multiple	Multiple	Multiple	Multiple	One	Multiple	Multiple	One	Multiple
Defense Intelligence Agency	Multiple	Multiple	Multiple	Multiple	None	One	Multiple	None	Multiple
National Security Agency	Multiple	Multiple	Multiple	Multiple	One	Multiple	Multiple	One	Multiple
National Geospatial-Intelligence Agency	Multiple	Multiple	Multiple	Multiple	One	Multiple	Multiple	One	Multiple
National Reconnaissance Office	Multiple	Multiple	Multiple	Multiple	Multiple	Multiple	One	One	Multiple
U.S. Air Force Intelligence	Multiple	Multiple	One	One	One	Multiple	None	One	Multiple
U.S. Navy Intelligence	Multiple	Multiple	Multiple	Multiple	None	One	Multiple	One	Multiple
U.S. Army Intelligence	Multiple	Multiple	Multiple	Multiple	One	One	Multiple	None	Multiple
U.S. Marine Corps Intelligence	Multiple	Multiple	None	One	None	Multiple	One	None	Multiple
Department of Energy's Office of Intelligence & Counterintelligence	Multiple	One	Multiple	One	None	One	One	None <sup>b</sup>	Multiple
Department of Homeland Security's Office of Intelligence & Analysis	Multiple	Multiple	Multiple	Multiple	Multiple	Multiple	Multiple	One	Multiple
Drug Enforcement Administration's Office of National Security Intelligence	Multiple	Multiple	Multiple	Multiple	One	One	Multiple	None	Multiple

<sup>1</sup>GAO, *Diversity Management: Expert-Identified Practices and Agency Examples*, GAO-05-90 (Washington, D.C.: Jan. 14, 2005).

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Practices for Workforce Diversity Management**

<b>Element</b>	<b>Leadership commitment (5)<sup>a</sup></b>	<b>Recruitment (4)<sup>a</sup></b>	<b>Employee involvement (5)<sup>a</sup></b>	<b>Diversity training (6)<sup>a</sup></b>	<b>Performance (4)<sup>a</sup></b>	<b>Succession planning (4)<sup>a</sup></b>	<b>Accountability (3)<sup>a</sup></b>	<b>Strategic planning (2)<sup>a</sup></b>	<b>Measurement (8)<sup>a</sup></b>
Federal Bureau of Investigation's National Security Branch	Multiple	Multiple	Multiple	Multiple	None	Multiple	One	Multiple	Multiple
Department of the Treasury's Office of Intelligence & Analysis	Multiple	One	Multiple	Multiple	Multiple	One	One	Multiple	Multiple
Department of State's Bureau of Intelligence & Research	Multiple	One	One	Multiple	Multiple	One	One	One	Multiple
U.S. Coast Guard Intelligence	Multiple	Multiple	Multiple	Multiple	Multiple	One	One	Multiple	Multiple
<b>Total IC elements taking multiple steps for each practice</b>	<b>17</b>	<b>14</b>	<b>14</b>	<b>14</b>	<b>6</b>	<b>9</b>	<b>9</b>	<b>3</b>	<b>17</b>

Source: GAO analysis of IC element documents and GAO leading practices for diversity management. | GAO-21-83

Notes: We assessed actions IC elements reported taking with leading practices for diversity management identified in [GAO-05-90](#). In 2005, we reported on these practices that we developed based on completing a literature review, and selected a list of recognized diversity experts based on interviews with federal officials and others. We gathered views on leading practices for diversity management in a data collection instrument and reviewed the responses from these experts, counting the number of times an expert cited a practice. Data were collected to assess whether agencies report taking steps consistent with GAO leading practices for diversity management. However, we did not assess the quality of implementation or direct impacts of these reported steps.

<sup>a</sup>This reflects the number of steps we assessed each element as taking for each diversity management leading practice.

<sup>b</sup>Department of Energy Office of Intelligence and Counterintelligence officials report that they utilize an outdated department diversity and inclusion strategic plan; however, officials report they expect the Department will develop a new plan by the end of fiscal year 2020.

# Appendix III: Comments from the Office of the Director of National Intelligence

OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE  
WASHINGTON, DC

Mr. Brian Mazanec  
Director, Defense, Capabilities, and Management  
United States Government Accountability Office  
Washington, D.C. 20548

DEC 04 2020

Dear Mr. Mazanec:

We appreciate the opportunity to review GAO Report-21-83SU *Additional Actions Needed to Strengthen Workforce Diversity Planning and Oversight*. Notwithstanding the following statements, the Office of the Director of National Intelligence concurs with recommendations in your report:

1. You correctly note that the *Joint Strategy* identifies goals and objectives, without published tangible steps and timeframes. It should be noted that specific, time-bound initiatives are not publicly available. Rather, these initiatives are internal working documents that follow the progress review template in Appendix D of the *Joint Strategy*. IC EEOD maintains a comprehensive record of planned and ongoing strategic initiatives and will periodically provide public transparency into status.
2. As noted in the recommendations section, Intelligence Community Directive (ICD) 110 charges the Chief of ODNI IC EEOD with leading the IC-EEOD program. However, ICD 110 is limited by the DNI's statutory authority and therefore is not interpreted as authorizing the Chief of IC EEOD to direct aspects of independent IC elements' diversity programs, nor drive accountability for resource decisions, personnel practices, hiring, promotions, or other aspects of IC elements' diversity programs. Leadership of IC elements under ICD 110 does enable the ODNI to task IC elements for data and ensure interagency collaboration toward jointly established IC priorities through the IC EEOD Council.

If you have any questions regarding this matter, you may contact Legislative Affairs at (703) 275-2474.

Sincerely,



Robert L. Cooper  
Acting Assistant Director  
for Legislative Affairs

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# Appendix IV: GAO Contacts and Staff Acknowledgments

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## GAO Contact

Brian M. Mazanec at (202) 512-5130 or [mazanecb@gao.gov](mailto:mazanecb@gao.gov).

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## Staff Acknowledgments

In addition to the contact above, Kristy Williams (Assistant Director); David Adams (Analyst In Charge), Tracy Barnes, Christopher Gezon, Suzanne Kaasa, Khaki LaRiviere, Ned Malone, Michael Perkins, and Clarice Ransom made key contributions to this report.

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