DIVERSITY, EQUITY,
INCLUSION, AND ACCESSIBILITY

STRATEGIC PLAN

2023 - 2026
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Background

“As the Nation’s largest employer, the Federal Government must be a model for diversity, equity, inclusion, and accessibility, where all employees are treated with dignity and respect. Accordingly, the Federal Government must strengthen its ability to recruit, hire, develop, promote, and retain our Nation’s talent and remove barriers to equal opportunity. It must also provide resources and opportunities to strengthen and advance diversity, equity, inclusion, and accessibility across the Federal Government. The Federal Government should have a workforce that reflects the diversity of the American people. A growing body of evidence demonstrates that diverse, equitable, inclusive, and accessible workplaces yield higher-performing organizations.”

- Excerpt from Executive Order 14035, Signed by President Joseph R. Biden Jr.

Executive Order 14035, Diversity, Equity, Inclusion, and Accessibility (DEIA) in the Federal Workforce, establishes, as the policy of this Administration to cultivate a workforce that draws from the full diversity of the Nation. The Executive Order (EO) focuses on seven areas:

1. Build and maintain a diverse pipeline
2. Achieve pay equity
3. Ensure equity for Lesbian, Gay, Bi-sexual, Transgender, Queer+ (LGBTQ) employees
4. Ensure equity for people with disabilities
5. Provide equity focused training, development, and opportunities for guaranteed advancement
6. Maintain a safe workplace
7. Support efforts with a data driven approach

The EO on DEIA establishes a government-wide initiative that takes a systematic approach to embed DEIA in Federal recruitment, hiring, employee development, promotions, talent retention, and to remove barriers to equal opportunity.

The Indian Health Service (IHS) DEIA Strategic Plan will apply the same terms and definitions associated with the EO on DEIA and the Department of Health and Human Services (HHS) DEIA Strategic Plan as they relate to the following:

1. **Underserved Communities**: refers to populations sharing a particular characteristic, as well as geographic communities, who have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life. In the context of the Federal workforce, this term includes individuals who belong to communities of color, such as Black and African American, Hispanic and Latino, Native American, Alaska Native, and
Indigenous, Asian American, Native Hawaiian and Pacific Islander, Middle Eastern, and North African persons. It also includes individuals who belong to communities that face discrimination based on sex, sexual orientation, and gender identity (including lesbian, gay, bisexual, transgender, questioning, intersex, queer, gender non-conforming, non-binary (LGBTQ+) persons); persons who face discrimination based on pregnancy or pregnancy related conditions; parents; and caregivers. It also includes individuals who belong to communities that face discrimination based on their religion or disability; first-generation professionals or first-generation college students; individuals with limited English proficiency; immigrants; individuals who belong to communities that may face employment barriers based on older age or former incarceration; persons who live in rural areas; veterans and military spouses; and persons otherwise adversely affected by persistent poverty, discrimination, or inequality. Individuals may belong to more than one underserved community and face intersecting barriers.

2. **Diversity**: means the practice of including the many communities, identities, races, ethnicities, backgrounds, abilities, cultures, and beliefs of a society, including underserved communities.

3. **Equity**: means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment.

4. **Inclusion**: means the recognition, appreciation, and use of the talents and skills of employees of all backgrounds.

5. **Accessibility**: means the design, construction, development, and maintenance of facilities, information and communication technology, programs, and services so that all people, including people with disabilities, can fully and independently use them. Accessibility includes the provisions of reasonable accommodations and program modifications to ensure equal access to employment, including workplace personal assistance services, and participation in activities for people with disabilities, the reduction or elimination of physical and attitudinal barriers to equitable opportunities, a commitment to ensuring that people with disabilities can independently access every outward-facing and internal activity or electronic space, and the pursuit of best practices such as universal design.

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**About the Indian Health Service**

The IHS, an agency within HHS is responsible for providing quality Federal health services to American Indian and Alaska Native (AI/AN) people. The IHS is the principal Federal health care provider and health advocate for Indian people.
The IHS organizational structure includes the Rockville, Maryland headquarters office and 12 administrative area offices located throughout the United States. The 12 IHS areas encompass a network of hospitals, clinics, and health stations.

Serving approximately 2.7 million American Indians and Alaska Natives from 574 federally recognized Tribes in 37 states, the IHS provides a wide range of clinical and public health services, along with community and facilities infrastructure services. Comprehensive primary health care and disease prevention services are provided through a network of hospitals, clinics, and health stations on or near Indian reservations. These facilities, which are managed by the IHS, Tribes, and Tribal Organizations, are predominately located in rural and primary care settings. In addition, the IHS contracts with Urban Indian Organizations (UIOs) for health care services provided to American Indians and Alaska Natives living in urban centers.

Unique to the IHS as compared to other HHS Operating Divisions is the application of Indian Preference Law 25 U.S. Code § 5117. Under this law, the IHS is required to provide preference in hiring American Indians and Alaska Natives who are enrolled in federally recognized Tribes as defined by the Secretary of the Interior. Indian Preference plays an important role in extending Federal employment opportunities and advancement to the AI/AN people, a long standing underserved community that is underrepresented within the Federal Government. This law is applied during recruitment, hiring, and promotion opportunities, and directly impacts the Agency’s DEIA program efforts in these areas. As opportunities occur, the IHS will continue to identify and develop unique solutions to incorporate DEIA best practices into its workplace.

Diversity Management and Equal Employment Opportunity Staff

Diversity Management and Equal Employment Opportunity Staff (DMEEO) provides leadership and guidance in administering the IHS’s equal employment opportunity (EEO) and the diversity and inclusion programs. The DMEEO ensures the employment rights of employees and applicants for employment are protected against unlawful discriminatory practices; and works to promote a diverse and inclusive workplace where employees are treated fairly and equitably in a safe work environment. The DMEEO supports the IHS to uphold its commitment to eliminating discrimination and maintaining a culture that values diversity, inclusiveness, and accessibility. The DMEEO accomplishes this by educating the workforce on EEO principles; assessing human capital policies, procedures, and workforce trends to remove barriers to equal opportunity; working collaboratively with agency leaders to proactively prevent unlawful discrimination; and processing EEO complaints alleging employment discrimination.
The Value of DEIA in the Workplace

The IHS mission, to raise the physical, mental, social, and spiritual health of American Indians and Alaska Natives to the highest level, is not just dependent on the strength of the agency’s programs, but also on the strength of our workforce. For the IHS to successfully achieve its mission, the agency has to attract and retain the best talent. The most productive, engaged, and innovative workplaces embrace and value DEIA as a business imperative. The infusion of DEIA strategies and objectives throughout the employment lifecycle in policies, practices, and programs, drives the development of a culture that values the strength of each employee's unique experience and individual contribution. Through this Plan, the IHS will address biases; evolve its workplace culture; create a sense of belonging for all employees; improve engagement and retention; and ensure everyone has a voice that is valued.

The Strategy

In March 2022, the Department established the HHS DEIA Strategic Plan. The HHS DEIA Strategic Plan provides a roadmap to advance DEIA across the Department, highlighting the following five principles:

- Demonstrated Focus on Increasing Diversity within HHS
- Improved Retention and Opportunity Creation
- Enhanced Climate for Equity, Inclusion, and Accessibility
- Leadership-Driven DEIA Culture Reform
- Strengthened DEIA Insights through Improved Data

The IHS DEIA Strategic Plan aligns with EO 14035 and the Department’s DEIA principles. In considering the priorities and strategies for this Plan, a variety of artifacts and resource documents were reviewed to understand the current state of DEIA at the IHS, such as:

- Management Directives, including MD-715 report
- Federal Employee Viewpoint Survey
- Federal Equal Opportunity Recruitment Program (FEORP)
- EEOC Form 462 Report
- President’s Management Agenda
- DEIA Promising Practices, Preliminary Assessments, and DEIA Maturity Models
- Government-Wide Strategic Plan to Advance DEIA in the Federal Workforce – November 2021
- HHS Human Capital Operating Plan 2020-2022
- IHS Strategic Plan 2019-2023
- Workforce data
HHS Principle 1. Demonstrated Focus on Increasing Diversity

Goal 1: Grow a Diverse Workforce
Recruit and hire a high-performing workforce that is inclusive of underrepresented groups, including people with disabilities (PWD) and people with targeted disabilities (PWTD)

Specific challenges identified:
- Limitations on achieving broad hiring of individuals in underrepresented groups that are not entitled to Indian Preference.
- No IHS Diversity and Inclusion Program Manager
- No DEIA program established
- Lack of partnerships with internal and external sources – some exist, however there are significant opportunities to increase and strengthen partnerships
- No EEO programs (e.g. Special Emphasis Program or Disability Program) to conduct barrier analysis using various sources
- Lack of clear or consistent recruitment or outreach strategy
- Lack of resources to support barrier analysis efforts

Strategic Objective 1.1: Recruitment

Planned Activities:
- Develop a recruitment plan for building a talent pipeline of individuals from underrepresented groups (e.g. PWD/PWTD)
- In collaboration with the Office of Human Resources (OHR) participate in job fairs and other recruitment activities
- Develop a Recruitment Toolkit that markets an inclusive work environment
- Promote paid internships for PWD/PWTD (e.g., Workforce Recruitment Program)
- Develop tips to reduce biases during the hiring process

Operational Measure:
- Number of applicants within each underrepresented group by grade level. (Applicant flow data and IHS internal data) - Quarterly

Outcome Measures:
- Increase in underrepresented groups by X percent in recruitment pools. (Percentage will be determined by the IHS DEIA Council and informed based on data)
Lead Offices: DMEEO/Area EEO Offices and OHR/Area Human Resources (HR) Offices

Strategic Objective 1.2: Outreach

Planned Activities:
- Expand and leverage partnerships with HHS, external organizations, and colleges and universities
- In collaboration with OHR participate in and host IHS information sessions on careers with the IHS

Operational Measure:
- Number of outreach activities to underrepresented groups and number of outreach partners engaged in supporting outreach efforts

Outcome Measures:
- Increase diversity of recruitment pools within underrepresented groups by X percent. (Percentage will be determined by the IHS DEIA Council and informed based on data)

Lead Offices: DMEEO/Area EEO Offices and OHR/Area HR Offices

HHS Principle 2. Improve Retention and Opportunity Creation

Goal 2: Foster a Culture of Inclusiveness to Engage and Retain Talent

Establish a common understanding of DEIA and the important role it plays in creating an environment where employees can contribute and excel to their full potential while enabling the Agency to achieve its mission.

Specific challenges identified:
- Lack of a mature DEIA infrastructure
- Insufficient staff resources and funding to develop and sustain a comprehensive and effective DEIA program
- No coordinated soft-skills training for supervisors and non-supervisory employees (e.g. leadership, emotional intelligence, team dynamics, problem-solving, critical-thinking, communication, coaching)
- No DEIA messaging incorporated in on-boarding, Leadership Development Program and Training programs
- Lack of guidance to supervisors on DEIA-related topics
Strategic Objective 2.1: Educate the workforce on DEIA principles and engage employees in creating an inclusive work environment

Planned Activities:
- Develop a comprehensive education program to increase awareness of DEIA

Operational Measure:
- Number of DEIA-related trainings and events offered

Outcome Measure:
- Percentage of employees that participate in DEIA-related training and events

Lead Offices: DMEEO/Area EEO Offices

Strategic Objective 2.2: Establish Employee Resources Groups

Planned Activities:
- Develop guidance on establishing Employee Resource Groups (ERG)
- Facilitate the establishment of ERG
- Engage ERGs in DEIA barrier analysis and action planning activities

Operational Measure:
- Quarterly progress toward establishment of ERGs

Outcome Measure:
- Number of established ERGs

Lead Offices: DMEEO/Area EEO Offices

Strategic Objective 2.3: Utilize Barrier Analysis to assess, identify, and eliminate barriers to employment equities

Planned Activities:
- Educate EEO professionals and HR professionals on barrier analysis
- Form a cross-functional barrier analysis team
- Assess Agency workforce data, human capital programs and policies to identify employment barriers and identify action plans
Operational Measure:
- Conduct barrier analysis

Outcome Measure:
- Incremental improvement of identified barriers over 2-year period

Lead Offices: DMEO/Area EEO Offices, OHR/Area HR Offices

Strategic Objective 2.4: Expand career enhancement programs and opportunities

Planned Activities:
- Require development of Individual Development Plans for employees to acquire competencies that prepare them for advancement
- Create and identify career development programs
- Establish a mentoring program

Operational Measure:
- Increased number of proportional representation of underrepresented groups receiving promotions and/or career development opportunities.

Outcome Measure:
- Percentage of underrepresented groups across grade levels comparative to Relevant Civilian Labor Force (RCLF)

Lead Offices: DMEO, HQ OHR/Area Human Resources Offices

HHS Principle 3. Enhanced Climate for Equity, Inclusion, and Accessibility

Goal 3: Ensure a Safe and Inclusive Workplace

The IHS has policies and procedures to prevent workplace harassment to ensure a safe, respectful, inclusive work environment.

Specific challenges identified:
- Allegations of workplace harassment not addressed timely
- No consistent tool for tracking compliance
- Reasonable Accommodation Policy does not comply with EEOC guidance
Reasonable accommodation requests not timely addressed and implemented
Lack of understanding of reasonable accommodation process which increases Agency’s liability

**Strategic Objective 3.1:** Monitor and evaluate employee safety in the workplace

**Planned Activities:**
- Train the workforce on the new IHS Prevention of Workplace Harassment Policy and procedures for addressing workplace harassment
- Develop an Anti-Harassment Policy Statement
- Develop an anti-harassment reporting and tracking tool
- Educate IHS employees on anti-harassment laws
- Establish Anti-Harassment Coordinators for IHS HQ/Areas
- Develop web-based workplace harassment training module
- Form a Domestic Violence, Sexual Assault, and Stalking (DVSAS) Planning Group to evaluate the agency’s current services and assistance available to support employees

**Operational Measure:**
- Allegations of workplace harassment are addressed timely

**Outcome Measure:**
- Reduction in workplace harassment

**Lead Offices:** DMEEO, Area Anti-Harassment Coordinators, OHR/Area HR Offices

**Strategic Objective 3.2:** Monitor and evaluate accessibility in the work environment for IHS employees and applicants for employment

**Planned Activities:**
- Revise the IHS Reasonable Accommodation Policy
- Develop an electronic reasonable accommodation requesting and tracking tool
- Train IHS employees on reasonable accommodation laws and the IHS policy and procedures for addressing requests for reasonable accommodation
- Establish Reasonable Accommodation Coordinators for IHS Areas
- Develop web-based reasonable accommodation training module
• Ensure the IHS information technology and communication tools comply with the accessibility standards of Section 508 of the Rehabilitation Act of 1973

**Operational Measure:**

• Requests for workplace accommodations are addressed timely

**Outcome Measure:**

• Compliance with the requirements of the Rehabilitation Act of 1973 and the IHS Reasonable Accommodation Policy

**Lead Offices:** DMEO, Area Reasonable Accommodation Coordinators, and IHS Office of Information Technology

### HHS Principle 4. Leadership-Driven DEIA Cultural Reform

#### Goal 4: Leadership’s Commitment to DEIA Principles

Ensure leaders at all levels promote the vision and business case for DEIA by demonstrating a strong commitment to embedding DEIA into the IHS culture.

**Specific challenges identified:**

• Lack of a mature DEIA infrastructure
• Insufficient staff resources and funding to develop and sustain a comprehensive and impactful DEIA program
• Lack of understanding of the risks associated with not incorporating DEIA principles into the work culture and the effect it has on achieving the mission

#### Strategic Objective 4.1: Establish an IHS DEIA Council

**Planned Activities:**

• Sufficiently resource the IHS DEIA program management staff
• Draft an IHS DEIA Council proposal
• Draft an IHS DEIA Council Charter

**Operational Measure:**

• Quarterly progress toward establishing an IHS DEIA Council

**Outcome Measures:**

• Number of participants in employee-based groups (e.g. Employee Resource Groups, Accessibility Councils, etc.)
Lead Offices: IHS Office of the Director (OD) and DMEEO

Strategic Objective 4.2: Infuse DEIA in communication and messaging throughout various IHS HR and EEO Programs

Planned Activities:
- Draft an IHS DEIA Policy Statement
- Construct a communication plan that provides clear, consistent, and regular messaging illustrating the IHS’s commitment to DEIA in the workplace
- Ensure inclusive language is utilized in agency communications, policies, and when acquiring information technology (e.g., compliance with Section 508 of the Rehabilitation Act, etc.)

Operational Measure:
- Quarterly progress against communication plan

Outcome Measure:
- Number of DEIA communications focused on improving DEIA in the workplace connecting to and policies with inclusive language

Lead Offices: IHS OD, DMEEO, OHR, Public Affairs, IHS Program and Area Directors

Strategic Objective 4.3: Empower IHS employees to demonstrate excellence in furthering DEIA principles

Planned Activities:
- Develop an annual DEIA award category and criteria to be included in the IHS Director’s Award Program
- Incorporate DEIA performance elements in employee Performance Management Appraisal Plans

Operational Measure:
- Number of employees, supervisors, and managers that participate in DEIA activities in an effort to incorporate DEIA into the IHS culture

Outcome Measure:
- Number of employees, supervisors, and managers recognized for demonstrating superior accomplishment in EEO
Lead Offices: IHS OD, DMEEO, and OHR

HHS Principle 5. Strengthened DEIA Insights through Improved Data

Goal 5: EEO Data Source

Develop an IHS EEO metrics dashboard to track EEO Programs – EEO cases, EEO and Diversity training, mission critical occupations, unrepresentative groups, leadership positions, career development, awards, and hiring and recruitment efforts

Specific challenges identified:
- Incomplete HHS workforce demographic and organizational culture data to inform decision-making
- Data integrity issues preventing data accuracy
- Insufficient data transparency and availability

Strategic Objective 5.1: DEIA Dashboard

Planned Activities:
- Assist in the development of HHS DEIA Dashboard for use at IHS
- Collect and analyze EEO-related data to improve enforcement of EEO-related laws and agency policies

Operational Measure:
- Accurate workforce data captured in the HHS Business Intelligence Information System (BIIS) and other data reports

Outcome Measure:
- Accurate workforce data captured in BIIS reports

Lead Offices: HHS EEODI, DMEEO, OHR, Area HR Offices