

FEORP Checklist



1. FY 2021 FEORP Plan Accomplishments and Successful/Promising Practices.

Identify accomplishments and progress made on the strategies identified in the agency FY 2021 Plan. Also, identify a policy, successful/promising practice or procedure (do not list a set of completed tasks) where your agency has been successful in the implementation of actions outlined in its Diversity and Inclusion Strategic Plan. For each accomplishment, include a concise explanation of the **action** taken, **measure** utilized, and the **outcome**.

Note: Agencies that have submitted promising practices and agency self-assessments pursuant to Executive Order 14035, may examine the same body of information to identify a policy, practice, or procedure for inclusion in the 2021 FEORP report. However, since the DEIA promising practices reports were intended to inform internal agency deliberations, such documents should not be submitted in response to the FEORP call nor incorporated by reference. Agencies may use the promising practices information to develop a response to this question. The response should focus on describing the practice, and how the practice is designed to eliminate underrepresentation of minorities in the various categories of civil service employment. *See also* Response to Frequently Asked Question 5, (Appendix 2).

Submit no more than two pages in **Microsoft Word (Times New Roman 12 point font)**.



2. Diversity and Inclusion Strategic Plan.

The FEORP requested paragraph does not apply to the U.S. Nuclear Regulatory Commission (NRC). Per OPM FEORP guidance, the NRC has included a paragraph that does apply to the NRC.

3. Strategic activities related to Hispanic Employment in the Federal Government (EO 13171).

Identify strategic activities the agency has taken to address the underrepresentation, career development, and retention of Hispanics during the prior fiscal year. Include a concise explanation of the **action** taken, **measure** utilized, and the **outcome**. Also, include any findings from conducting applicant flow or workforce data barrier analysis and how the data is being used to improve agency outreach and recruitment. Submit no more than two pages in **Microsoft Word (Times New Roman 12 point font)**.





4. Strategic activities related to the employment of individuals with disabilities.

Identify strategic activities the agency is implementing to meet the goals set forth in Executive Order 13548, *Increasing Federal Employment of Individuals with Disabilities*. Include a concise explanation of the **action** taken, **measure** utilized, and the **outcome**. You may submit activities in the following categories:

- self-identification, benchmarking, analysis and accountability;
- outreach and recruitment;
- hiring;
- career development, advancement and retention;
- reasonable accommodations;
- internal and external communications; and
- training and education.

Submit no more than two pages in **Microsoft Word (Times New Roman 12 point font)**.



5. Progress Tracker

Provide data about the agency's formal mentoring programs, diversity and inclusion training, diversity and inclusion council(s), and development programs. Agencies with subcomponents with 500 or more employees are required to submit a Progress Tracker for each subcomponent. **See Attachment 1.**

Submit the Progress Tracker provided.



6. Annual FEORP Plan Certification. This is the last step before transmitting the reports to OPM. Please have the Agency Chief Human Capital Officer (CHCO) or Head of Human Resources, Director of Equal Employment Opportunity, and Director of Diversity and Inclusion or Chief Diversity and Inclusion Officer certify the information contained in the reports. In addition to the signature, please print the names, provide titles, email addresses, and telephone numbers. Also include a designated FEORP report point of contact we may contact if there are any questions.

Annual FEORP Plan Certification for the Fiscal Year 2022

A. Name and Address of Agency:

U.S. Nuclear Regulatory Commission, Office of the Chief Human Capital Officer (OCHCO) MS: TWFN 2 A 77M, Washington, DC 20555

B. Name and Title of Designated FEORP Official (Include e-mail address, telephone and fax numbers. In addition, please include address):

Tamla Ransford, Chief, Workforce Management and Benefits Branch (WMBB), OCHCO, MS: TWFN 2 A 77M, Washington, DC 20555;

C. Name and Title of Contact Person (Include e-mail address, telephone and fax number. In addition, please include address):

Kimberly English, Recruitment Program Manager, WMBB, OCHCO, MS: TWFN 2 A 77M, Washington, DC 20555; Kimberly.English@nrc.gov;

Certification

I certify the above agency: 1) Has a current Federal Equal Opportunity Recruitment Program (FEORP) plan and the program is being implemented as required by Public Law 95-454 and subsequent regulations and guidance issued by the U.S. Office of Personnel Management; 2) All field offices or installations with fewer than 500 employees are covered by a FEORP plan; 3) All field offices or installations with 500 or more employees are covered either by this plan or by a local plan; and 4) Such plans are available on request from field offices or installations.

Print Name Mary Lamary Signature Mary A. Lamary Date

Title: Chief Human Capital Officer

(Chief Human Capital Officer or Head of Human Resources)

Email Address: Mary.Lamary@nrc.gov

Telephone: 301-415-3300

Print Name Jeanne Dempsey for Von Signature Jeanne Dempsey Date

Title: Director, Equal Employment Opportunity

(Director, Equal Employment Opportunity)

Email Address: Vonna.Ordaz@nrc.gov

Telephone: 301-415-7380

Print Name Jeanne Dempsey for Von Signature Jeanne Dempsey Date

Title: Director, Diversity and Inclusion

(Director, Diversity and Inclusion)

Email Address: Vonna.Ordaz@nrc.gov

Telephone: 301-415-7380

Fiscal Year (FY) 2021 Report on Accomplishments and Successful/Promising Practices

The NRC is committed to maintaining a diverse workforce to achieve the NRC's mission. To demonstrate our commitment, the agency has developed an Inclusive Diversity Strategic Plan (IDSP). Below are FY 2021 examples of best practices that support several plan goals.

Goal: Diversify the Federal Workforce through Active Engagement of Leadership

Action: The IDSP set expectations for management and employees' behaviors and decisions. Office Directors and Regional Administrators submit IDSP reports demonstrating their actions to attract, recruit, retain, and cultivate diverse leaders by communicating, accounting for, and modeling inclusive behaviors.

Accomplishments: The IDSP reports reflect that Office Directors/Regional Administrators, managers and supervisors promoted the "Speed of Trust" principles, engaged in "Speed of Trust Huddles," and encouraged staff participation in Speed of Trust training activities. Managers and supervisors also supported diversity initiatives, cultural events, lunch and learn seminars, served on safety culture teams, and engaged staff through teambuilding, mentoring, and awards.

Outcome: The NRC remains a best place to work in the Federal Government. Our FY 2021 Federal Employee Viewpoint Survey Employee Engagement index ranking (76%) aligns with mid-size agency results (77%). Similarly, the NRC's rating (3.8) slightly exceeded the government-wide rating (3.7) on the OMB Employee Voice Pulse Survey question, "Agency leadership shows that diversity and inclusion (D&I) are important through their actions."

Action: The NRC launched an Agency Desired Culture Initiative, to align our culture with our transformation vision of being a modern, risk-informed regulator. Additionally, the Executive Director of Operations (EDO) established an Agency Culture Improvement Team (Culture Team) in which the Equal Employment Opportunity (EEO) Director serves as the Executive sponsor.

Accomplishments: The Culture Team helps to promote agencywide cultural diversity inclusion.

Outcomes: The Culture Team achieved the following outcomes: Implemented a "Bring Your Whole Selves to Work" initiative; Created three conversation guides that facilitate constructive dialogues about key behaviors that support the NRC Leadership Model, our agency culture behavior shifts and creating a safe space for candid and respectful dialogue; Created a mechanism to recognize other change agents who are modeling desired behaviors; Leveraged IdeaScale to capture stories that reflect #Culture Success as one way to positively reinforce, celebrate and share constructive habits; Administered a "Culture Pulse Survey to measure progress made in aligning the agency's cultural norms and expectations with our desired culture.

Action: The Leadership Model narratives are incorporated into SES performance plans to ensure structural elements are in place to reinforce behaviors consistent with Leadership Model expectations (e.g., promote the agency's ideal culture). Whistleblower language was also added to the supervisor element for GG supervisors, and in the Leading People element for SES and both will take effect in FY 2022.

Accomplishments: The NRC is able to evaluate, demonstrate, and reward managers, supervisors, and team leaders based on their commitment to the NRC's EEO and D&I policies and principles.

Outcomes: Alignment with the NRC's vision, accountability, and measurable performance results.

Goal: Include and Engage Everyone in the Workplace

Action: The NRC Diversity Management and Inclusion Council (DMIC) provides oversight and leadership for the IDSP with support from the EEO office and the Office of the Chief Human Capital Officer (OCHCO). The DMIC consists of 17 employees, of whom 13 (76 percent) are supervisors and non-supervisors, and 4 (24 percent) are senior leadership. Each Regional office has a Diversity Management Advisory Committee that assists the Regional Administrators create open and collaborative environments. The NRC also has eight EEO Advisory Committees that help achieve our EEO and diversity objectives. The NRC has established an Executive Sponsor Program to help the EEO Advisory Committees operate efficiently and effectively.

Accomplishments: Employee involvement in committees, programs, activities, and events.

Outcomes: The DMIC focuses on implementation of the IDSP with support from the EEO office and OCHCO. The EEO office and DMIC sponsored initiatives to promote diversity engagement. An example is the "DIALOGUE" program (Diversity Inclusion Awareness – Leading Organizational Growth, Understanding, and Engagement), which promotes appreciation for the value and positive impacts made by diverse groups. The NRC has completed 13 cohorts since 2017. The EEO office also created a Civility, Awareness, Respect and Engagement (iCARE) initiative to facilitate listening sessions and promote deeper understandings and appreciation for multicultural diversity, equity, and inclusion through group discussion. The EEO Advisory Committees prepared a joint statement for the 2021 public annual EEO Commission Briefing, and sponsored lunch and learn seminars, and roundtable discussions. The EmbraceNRC Summer 2021 initiative consisted of a team of 12 volunteer employees and over 40 ambassadors, who formed an alliance to welcome summer interns and hosted events and experiential learning.

Goal: Optimize Inclusive Diversity Efforts Using Data-Driven Approaches

Action: The EEO office provided training sessions utilizing data analytics to influence decision-making and how to incorporate data analysis into action planning by using FEVS and the NRC's Safety Culture and Climate Survey results, along with other sources of feedback (e.g., trends). Emphasis is placed on the analysis of the five inclusive habits (fairness, openness, cooperativeness, supportiveness and empowerment) and recognizing and addressing implicit and unconscious bias.

Accomplishments: Incorporating insights from data sources helped to identify common themes and develop a unified improvement planning approach to target change efforts going forward.

Outcome: Conducted EEO and D&I training sessions for managers, supervisors, and team leaders. Office heads developed culture improvement plans to outline specific behaviors and process changes that will help us move from the current culture to our desired culture.

**U.S. Nuclear Regulatory Commission (NRC)
Federal Equal Opportunity Recruitment Program (FEORP)
Fiscal Year (FY) 2022 Inclusive Diversity Strategic Plan**

As an independent agency, the U.S. Nuclear Regulatory Commission (NRC) has taken the position that Executive Order (EO) 14035, Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce, is not applicable. The agency is not required to comply with EO 14035 but does have a Fiscal Year 2021-2026 Inclusive Diversity Strategic Plan (IDSP) that follows the provisions set forth under EO 13583. The IDSP provides a blueprint for linking diversity and inclusion to NRC's mission and productivity, increased employee engagement, and healthy organizational culture transformation. The IDSP serves as a support mechanism to help NRC's employees, supervisors, and managers remain committed to building, maintaining, and retaining a diverse, high-quality workforce where employees are recognized and their talents are valued; barriers to employment are eliminated and all employees are treated fairly in the performance of their assigned duties and responsibilities; and employees are encouraged to openly express their ideas and opinions to solve problems of national and international scope.

**U.S. Nuclear Regulatory Commission (NRC)
Federal Equal Opportunity Recruitment Program (FEORP)
Fiscal Year (FY) 2021 Report on Hispanic Employment Strategies and Applicant Flow
Data**

The NRC utilizes multiple strategies and activities to recruit, develop, and retain Hispanics. The following actions were taken to improve the number of Hispanics hired and retained:

- During FY 2021, 63% (15 out of 24) of our recruitment activities focused on diversity which includes minority serving institutions/organizations, including veterans, veterans with disabilities or people with disabilities of which one was cosponsored by the Society of Hispanic Professional Engineers (SHPE) and three are Hispanic Serving Institutions (HSIs).
- The NRC FY 2021 Summer Internship Program included two participants that were enrolled in HSIs.
- The NRC's Hispanic Employment Program Advisory Committee (HEPAC) works with the Office of Small Business and Civil Rights to identify issues of concern to Hispanic-Americans in the NRC, implemented initiatives to increase Hispanic representation at all levels in the agency.
- In celebration of Hispanic Heritage Month, HEPAC sponsored an agencywide celebration luncheon with the theme "Esperanza: A Celebration of Hispanic Heritage and Hope." Opening remarks were given by NRC Chairman Christopher Hanson. The keynote speaker was Dr. Carlos Vargas-Silva, Director of the Centre on Migration, Policy and Society and Professor in Migration Studies at the University of Oxford.
- The NRC's HEPAC, along with three other Equal Employment Opportunity (EEO) Advisory Committees provided a status report during the Human Capital and EEO Mid-Year Commission Briefing. HEPAC implemented initiatives to increase Hispanic representation at all levels in the agency and eliminate barriers that may hinder equal opportunity in hiring, training, retention, and career advancement.
- The HEPAC, along with the other EEO Advisory Committees, the Veterans Employee Resource Group, Blacks in Government, and the NRC's Technical Women's Network co-sponsored the following virtual events: Lunch 'n Learn on COVID-19 and Vaccine Updates, which included a presentation by Dr. Hana Akselrod; Commemoration of the 20th Anniversary of 9/11; Commemoration event honoring Justice Ruth Bader Ginsburg; and a military appreciation month event.
- The NRC awarded \$19.4M in University Nuclear Leadership Program grants in FY 2021 to support research and development, fellowship, scholarship, and faculty development. Awards were made to 33 institutions of which 6 grants were awarded to Minority Serving Institutions, totaling \$1.93M, including HSIs. Grants were awarded to the following

HSIs: Columbia Basin Community College, University of Texas at San Antonio, University of Texas at Arlington, and Florida International University totaling \$1.34M.

- Our FY 2021 applicant flow data indicated that, of the 881 applicants who provided their Race and National Origin (RNO) information, 9.2% (81) self-identified as Hispanic. Out of the 81 self-identified Hispanic applicants, 79% (64) were deemed qualified, and 6.3% (4) of those 64 were selected. Hispanics represented 4.9% (4) of new permanent hires, internal promotions and those who converted into permanent positions in FY 2021.

Point of Contact for the NRC's applicant flow data analysis:
Tamla Ransford, Chief, Workforce Management and Benefits Branch,
Office of the Chief Human Capital Officer, U.S. Nuclear Regulatory Commission

**U.S. Nuclear Regulatory Commission (NRC) Federal Equal Opportunity
Recruitment Program (FEORP) Fiscal Year (FY) 2021 Report on Employment
of Individuals with Disabilities**

To fulfill Executive Order 13548, “Increasing Federal Employment of Individuals with Disabilities,” the NRC continued to implement activities to improve recruitment and retention of people with disabilities (PWD), including people with targeted disabilities (PWTD).

Outreach and Recruitment – The following actions were taken to increase the number of applications from PWD and PWTD:

- During FY 2021, 63% (15 out of 24) of our recruitment activities focused on diversity of which two events (Equal Opportunity Publications and City Career Fair 21st Annual Diversity Day) focused on PWD/PWTD and vacancies were posted on the Ability Corps/Ability Magazine and GettingHired.com job boards.
- Shared 29 vacancies with contacts at Maryland Department of Rehabilitative Services.
- Partnered with the Department of Defense Operation Warfighter (OWF) Program, which provides Federal internship opportunities in a supportive work setting to recovering service members.
- Partnered with the Workforce Recruitment Program (WRP) by accessing their resume database to search for candidates for Administrative Assistants and Regulations Assistants.

As a result of these actions the following outcomes were achieved:

- Referred 18 resumes from our internal Schedule A database to HR Specialists for various jobs.
- Referred and hired a OWF Program Intern for a five-month rotation.
- Referred and subsequent hiring of a veteran whose resume is from the Veterans Resume database for a Region IV Physical Security Inspector position.

Hiring -- The following actions were taken to increase the number of PWD and PWTD hired:

- The NRC continued to implement its Affirmative Action Plan, which includes a 12% representation rate goal for people with disabilities, both at the GG-11 level and above (including Senior Executive Service (SES), and at the GG-10 level and below. The Plan also includes a 2% representation rate goal for people with targeted/severe disabilities, both at the GG-11 level and above (including SES), and at the GG-10 level and below.
- Promoted the use of our Schedule A equivalent hiring authority by providing training for supervisors on special hiring authorities and forwarding resumes of eligible applicants to hiring managers.
- To improve career advancement opportunities for PWD and PWTD, the NRC offered training, internship, and mentoring programs.

As a result of these activities, the NRC hired 21 people with disabilities (16% of all new hires), and 3 of the 21 people had a targeted disability. This represents an increase of 8% when compared to the 13 hires (including 1 hire with a targeted disability) in FY 2020. Although we

have not yet achieved our 12%/2% goals, we have shown progress by increasing the number of PWD/PWTD employed at the NRC.

Reasonable Accommodations: The following actions were taken to ensure that employees and applicants can fully participate in the workplace:

- Received approval from the Equal Employment Opportunity Commission (EEOC) for the NRC's Reasonable Accommodations Procedures (RAP) and annual Disability Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities, in compliance with Section 501 regulations and EEOC guidance.
- Conducted four Equal Employment Opportunity and Diversity & Inclusion training courses for managers and supervisors, which covered disability regulations, requirements, NRC procedures and processes, and manager/supervisor responsibilities related to reasonable accommodations.
- Posted notices explaining employees' and applicants' rights under applicable regulations, including how to file a complaint.
- The NRC's Advisory Committee for Employees with Disabilities sponsored the Disability Employment Awareness Month Luncheon and a lunch and learn on "Seeing into the Future."
- Provided training on the new reassignment guidance consistent with the RAP. To support reasonable accommodations and return to work needs, the NRC utilizes resources such as, the Job Accommodation Network; the Computer/Electronic Accommodations Program (CAP); and the State Vocational Rehabilitation Services. The NRC is working to standardize a process to obtain Personal Assistant Services (PAS) from an independent contractor, if needed, to ensure compliance with the Rehabilitation Act.
- The NRC Deaf Community was surveyed for comments and concerns regarding services to be performed by a new sign language and transcription service contract. One member of the Deaf community served on the panel to review capabilities presentations from potential sign language/transcription service vendors.
- The NRC continues to post the RAP and PAS procedures on the agency's internal and public Web sites, pursuant to the Rehabilitation Act requirements.

As a result of these activities, the NRC has established processes, procedures, and training to reinforce staff and supervisor rights and responsibilities under the agency's reasonable accommodations programs.

On January 3, 2017, the EEOC updated Section 501 of the Rehabilitation Act. To achieve compliance, the NRC implemented a FY2019 - FY2024 Disability Program Strategic Project Plan, annual Disability Affirmative Action Plan, and is committed to providing PAS for people with targeted disabilities. The NRC ensures individuals with disabilities equal access to electronic information and data. Policy and guidance are found on NRC Site Accessibility web page (<https://www.nrc.gov/site-help/access.html>). The NRC also ensures agency facilities and equipment are compliant with current Americans with Disabilities Act Accessibility Guidelines. Complaints are filed with the NRC's Office of Small Business and Civil Rights.

FY 2021 FEORP Progress Tracker

U.S. Nuclear Regulatory Commission (NRC)

Mentoring

Mentoring	Qualitative Questions (Text)	If "No" or "Other", please use this section to provide a detailed explanation.
Agency has a Formal Mentoring Program	Response Yes	OCHCO designed a self-service career mentoring program designed to connect people who are interested in being a mentor or mentee. They learn from each other and help create a more inclusive workplace.
Mentoring Training provided	Response Yes	Mentoring Training is provided in a self-service model; Several online videos are available, written resources, and other mentoring resources are posted on the agency internal mentoring Web page.
Program is evaluated	Response No	The current Mentoring Program is a self-service program in which employees enroll themselves and access online resources. The NRC does not perform a formal evaluation of this program.
Frequency of Program Evaluation (e.g. annual, semiannual, quarterly, other)	Response Other	The NRC does not perform formal evaluation of this program.
Feedback is provided	Response Yes	
Program is announced to all qualified individuals	Response Yes	
Agency collects demographic data of mentoring participants (Race, National Origin, Veteran, People with Disabilities, etc.)	Response Yes	

Mentoring	Quantitative Questions (# or %)	
Percent of employees involved with mentoring in FY 2021	Response 6.62%	
Percent of SES involved with mentoring in FY 2021	Response 41.46%	
Percent of managers involved with mentoring in FY 2021	Response %	
Percent of supervisors involved with mentoring in FY 2021	Response 21.01%	
Count of employees involved with mentoring in FY 2021	Response 196	
Count of SES involved with mentoring in FY 2021	Response 51	
Count of managers involved with mentoring in FY 2021	Response	
Count of supervisors involved with mentoring in FY 2021	Response 54	
Total number of employees eligible to participate in FY 2021	Response 2962	

Diversity and Inclusion Training

Diversity and Inclusion Training	Qualitative Questions (Text)	If "No" or "Other", please use this section to provide a detailed explanation.
Formal Diversity and Inclusion Training provided	Response Yes	

Frequency of Diversity and Inclusion Training per year (e.g. annual, semiannual, quarterly, other)	Response	
	Annual	
All employees briefed on agency's Diversity and Inclusion Policies	Response	The NRC issued a formal Diversity and Inclusion Policy Statement on February 17, 2021, which was signed by the agency's Chairman and distributed to all employees through a Yellow Announcement.
	Yes	
Diversity and Inclusion Training Quantitative Questions (# or %)		
Percent of employees who have participated in formal Diversity and Inclusion Training in FY 2021	Response	
	4.70%	
Percent of Senior Leadership that have participated in formal Diversity and Inclusion Training in FY 2021	Response	
	24.10%	
Count of employees who have participated in formal Diversity and Inclusion Training in FY 2021	Response	
	142	
Count of Senior Leadership that have participated in formal Diversity and Inclusion Training in FY 2021	Response	
	13	
Total number of employees eligible to participate (this should not be equal to the total count that has participated unless 100% of workforce has participated) in FY 2021	Response	
	3012	
Diversity and Inclusion Council		
Diversity and Inclusion Council	Qualitative Questions (Text)	If "No" or "Other", please use this section to provide a detailed explanation.
Agency has a Diversity and Inclusion Council	Response	
	Yes	
Diversity and Inclusion Council has a charter	Response	
	Yes	
Council members have received training	Response	
	Yes	
Council's mission aligns to agency mission	Response	
	Yes	
Frequency of council meetings (e.g. annual, semiannual, quarterly, other)	Response	
	Quarterly	
Diversity and Inclusion Council Quantitative Questions (# or %)		
Percent of employees on council	Response	
	76.00%	
Percent of Senior Leadership on council	Response	
	24.00%	
Count of employees on council	Response	
	13	
Count of Senior Leadership on council	Response	
	4	
Total number of people on council	Response	
	17	
Development Programs		
Development Programs	Qualitative Questions (Yes or No)	If "No" or "Other", please use this section to provide a detailed explanation.
Agency has a SES Candidate Development Program that is announced to all qualified individuals	Response	
	Yes	
The SES Candidate Development Program is evaluated regularly	Response	
	Yes	
Agency has a Career Development Program that is announced to	Response	

all qualified individuals (this is a CDP that is different from the SES CDP program and geared towards the lower grade levels)	Yes	
The Career Development Program is evaluated regularly	Response	
	Yes	
Agency collects demographic data of development program participants (Race, National Origin, Veteran, People with Disabilities, etc.)	Response	
	Yes	
Development Program	Quantitative Questions (# or %)	
Percent of employees who participated in the SES Candidate Development Program in FY 2021	Response	
Percent of employees who participated in a Career Development Program in FY 2021	Response	18.39%
Count of employees who participated in the SES Candidate Development Program in FY 2021	Response	
Count of employees who participated in a Career Development Program in FY 2021	Response	529
Performance Plans		
Does your agency have a Diversity and Inclusion (D&I) element in the following groups' performance plans (this may also be incorporated in the leading people element)?		
D&I Element in SES performance plans		Use this section to provide additional response or explanation as it relates to a D&I element in performance plans (required for "No" responses)
Yes or No	Percentage	Count
Yes	100.00%	118
D&I Element in Management/Supervisor performance plans		Use this section to provide additional response or explanation as it relates to a D&I element in performance plans (required for "No" responses)
Yes or No	Percentage	Count
Yes	100.00%	257
D&I Element in employee performance plans		Use this section to provide additional response or explanation as it relates to a D&I element in performance plans (required for "No" responses)
Yes or No	Percentage	Count
No	0.00%	2587
		D&I element is included in managerial or higher level performance plans.