



THE U.S.  
PRIVACY AND CIVIL LIBERTIES  
OVERSIGHT BOARD

Diversity,  
Equity,  
Inclusion, and  
Accessibility  
Strategic Plan  
2023 - 2026

MARCH 2023

# Privacy and Civil Liberties Oversight Board

## Diversity, Equity, Inclusion, and Accessibility Strategic Plan

2023 - 2026

**March 2023**

PRIVACY AND CIVIL LIBERTIES OVERSIGHT BOARD  
800 N. CAPITOL STREET, NW  
WASHINGTON, DC 20002

This report is available at <https://www.pclob.gov/>.  
Send comments or questions to [info@pclob.gov](mailto:info@pclob.gov) or to the mailing address above.

## **TABLE OF CONTENTS**

About This Report.....	1
Introduction.....	2
Key Definitions .....	2
DEIA Vision, Mission, and Operating Principles.....	3
PCLOB Maturity Model.....	8
PCLOB Workplace Safety and Harassment Prevention and Response Plan .....	10



## ABOUT THIS REPORT

The Privacy and Civil Liberties Oversight Board (PCLOB) Diversity, Equity, Inclusion, and Accessibility (DEIA) Strategic Plan 2023-2026 updates the agency’s first DEIA Strategic Plan, issued in March 2022, in response to the President’s Executive Order (EO) 14035, *Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*. EO 14035 was issued to further advance equity within the Federal Government by promoting diversity, equity, inclusion, and accessibility, outlining measures for agencies to develop DEIA strategic plans and report annually on their accomplishments towards achieving a stronger Federal workforce “from all segments of society.”

After a year-long endeavor to develop and implement an agency DEIA program from scratch, the PCLOB’s DEIA Team made significant progress towards achieving the agency’s initial DEIA strategic goals while learning some valuable lessons along the way, as reported in the PCLOB’s 2022 DEIA Annual Progress Report. This report outlines the agency’s updated multi-year strategic approach to building an inclusive, equitable, and accessible workplace that inspires engagement, creativity, and excellence. Since the agency’s DEIA vision, mission, and principles remain constant and span the course of multiple years, PCLOB will use the annual progress report to update the DEIA Roadmap for agency action each year, as the program matures, in the “Next Steps” section. The PCLOB will utilize both this Strategic Plan and the annual progress reports to inform and advise the Board.



## INTRODUCTION

The Privacy and Civil Liberties Oversight Board (PCLOB) is an independent agency within the Executive Branch. The PCLOB's mission is to ensure that the federal government's efforts to protect the nation from terrorism are appropriately balanced with the need to protect privacy and civil liberties. PCLOB conducts oversight and provides advice regarding legislation, regulations, policies, procedures, and activities related to counterterrorism. The PCLOB is not a regulatory agency, does not issue or implement policies that impact the public, and does not provide programs, benefits, or services to the public.

The PCLOB's DEIA Strategic Plan 2023-2026 reflects a commitment by the agency to make DEIA considerations a core component of the agency's workforce and decision-making framework. PCLOB believes a diverse workforce and inclusive workplace are integral to executing the agency's mission. As outlined below, PCLOB will continue to evaluate DEIA opportunities and initiatives and implement core DEIA principles and policies throughout the agency.

## KEY DEFINITIONS

As defined by EO 14035, the following definitions apply:

- DIVERSITY:** The practice of including the many communities, identities, races, ethnicities, backgrounds, abilities, cultures, and beliefs of the American people, including underserved communities.
- EQUITY:** 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.
- INCLUSION:** The recognition, appreciation, and use of the talents and skills of employees of all backgrounds.
- ACCESSIBILITY:** The design, construction, development, and maintenance of facilities, information and communication technology, programs, and services so that all people, including people with disabilities, can fully and independently use them.



## DEIA VISION, MISSION, AND OPERATING PRINCIPLES

### VISION

To advance and embed Diversity, Equity, Inclusion, and Accessibility throughout PCLOB'S workforce.

### MISSION

PCLOB will work to draw from the full diversity of the nation, position itself as a model employer that values and promotes equity, and incorporate those principles in conducting its oversight and advice projects.

### OPERATING PRINCIPLES

Consistent with the Government-wide DEIA Strategic Plan, PCLOB implemented the following five foundational principles into this PCLOB DEIA Strategic Plan 2023-2026 for consideration and development of strategies:

1. Use data and evidence-based decision-making.
2. Focus on continuous improvement.
3. Adopt a collaborative whole-of-agency mandate with partnership engagement.
4. Prioritize accountability and sustainability.
5. Understand the perspectives of the workforce and the customers.

The following discusses the above principles in more detail and provides examples of DEIA initiatives the PCLOB could incorporate across the agency and throughout the various stages of implementation of PCLOB'S DEIA program to achieve those principles. Note, the "Next Steps" section of the annual DEIA Progress Report includes the PCLOB DEIA "Road Map", which outlines the DEIA goals PCLOB intends to accomplish or on which it will seek to make significant progress in the following year.



**PRINCIPLE 1: Use Data and Evidence-Based Decision-Making.**

The PCLOB intends to apply a data-driven approach to implementing DEIA initiatives across the agency. This approach will include an analysis of demographic data, and both qualitative and quantitative examinations of agency practices, policies, and programs to gain better insight into organizational barriers to DEIA at PCLOB. Specifically, PCLOB will endeavor to gather additional workforce composition data, including data pertaining to recruitment, hiring, professional development, promotion, retention, performance evaluation, pay and compensation practices, and inclusive workplace culture. This approach will help PCLOB evaluate data and evidence at all phases of the employment cycle, allow leadership to assess outcomes, and then develop initiatives to strengthen DEIA in PCLOB policies, practices, and culture.

In addition to a commitment to gather additional workforce composition data, PCLOB will endeavor to assess quantitative and qualitative data collected and integrate insights gained into PCLOB policymaking and operations. Further, PCLOB will implement the following initiatives:

- ❖ Conducting regular and periodic climate surveys to gather additional qualitative data;
- ❖ Performing an annual pay equity audit to assess whether different demographic groups in similar positions are equitably compensated; and
- ❖ Incorporating DEIA-focused questions into exit interviews.

---

**PRINCIPLE 2: Focus on Continuous Improvement.**

The PCLOB is committed to developing robust DEIA initiatives and, therefore, continuous, incremental improvement will be necessary to achieve positive, long-lasting DEIA outcomes. As a micro-agency with limited resources and a small staff, PCLOB is not of sufficient size to build and staff a DEIA program comparable to those at large agencies; however, PCLOB will continue to enhance DEIA initiatives as it further develops its policies and practices. As PCLOB devises its DEIA initiatives, it will consider issues, including staffing and budget resources, and visibility of initiatives within the agency, such as professional development opportunities and recruitment efforts to target broader populations.



To promote continuous improvement of DEIA across the agency, the PCLOB will maintain an active DEIA Team, led by Board Chair. The DEIA Team is composed PCLOB senior staff across the agency. The DEIA Team has and will continue to develop metrics for each DEIA initiative, periodically reviewing DEIA initiatives to ensure that PCLOB continues to make steady progress on its DEIA commitments.<sup>1</sup> Using data and feedback from job applicants and current staff, the DEIA Team, in coordination with the Board, will determine whether a specific proposal has a material impact on DEIA outcomes at the agency. If the proposal is considered a success, the DEIA Team will work to implement the successful proposal on a wider scale and continue to collect more feedback to assess results.

As PCLOB works to implement this DEIA Strategic Plan, it will contemporaneously work to implement the Agency's Equity Action Plan issued pursuant to EO 13985, *Advancing Racial Equity and Support for Underserved Communities through the Federal Government*. The DEIA Team and Equity Team<sup>2</sup> will brief the Board quarterly on the status of both Equity and DEIA initiatives and analysis of collected feedback.

Further, additional resources could help address any barriers and advance equity in the agency. As part of the PCLOB's continuous improvement efforts, the DEIA Team continues to assess PCLOB's DEIA-related resources and make recommendations as needed to enhance DEIA initiatives. Specifically, the DEIA Team will assess and make recommendations to the Board about PCLOB budgetary, personnel, training, and other necessary resources.

---

**PRINCIPLE 3: Adopt a Collaborative, Whole-of-Agency Mandate with Partnership Engagement.**

The Board commits to advancing DEIA across the agency. To create a truly equitable workplace, the PCLOB recognizes that it must leverage the skills and resources of the entire agency to successfully implement core DEIA principles. Accordingly, ensuring DEIA implementation and assessment will be the responsibility of the entire agency and not just PCLOB's human resources staff. This effort will also include working with partners, such as interagency partners, shared service providers, and other institutions and organizations.

---

<sup>1</sup>Refer to the annual PCLOB DEIA Progress Report "Next Steps" section for the annual "Road Map."

<sup>2</sup> Pursuant to the Equity Order, PCLOB established an Equity Team to guide implementation of initiatives outlined in PCLOB's Equity Action Plan. As noted, PCLOB has limited resources and a small staff, so the Equity and DEIA Team are composed of the same positions within in PCLOB and will work to implement both Equity and DEIA initiatives across the agency. As part of the quarterly leadership briefings, PCLOB will assess progress under its Equity Action Plan and this DEIA Strategic Plan.





The DEIA Team is composed of individuals from across the agency and reports directly to the Board. Therefore, implementation of DEIA actions and recommendations for continuous improvement of DEIA outcomes will not be siloed in one office or with one official. Examples of potential long-term initiatives to promote DEIA principles across the agency and embed them into PCLOB's culture include:

- ❖ Engaging employees from all backgrounds in agency planning; and
- ❖ Coordinating with other agencies to address potential barriers to DEIA at PCLOB, such as coordination on the security clearance process to enhance opportunities for more individuals from historically underserved and immigrant communities.<sup>3</sup>

Further, PCLOB will begin implementing the following initiatives:

- ❖ Require managers to complete DEIA training, and training for all staff who participate on interview panels on how to conduct inclusive interviews that limit bias;<sup>4</sup>
- ❖ Encourage senior leaders to engage with a wide variety of employees across the organization to support their career growth, including developing a pilot mentorship program for new employees; and
- ❖ Develop partnerships with institutions that serve historically underserved communities, including colleges and universities, law schools, professional associations, etc.

---

#### **PRINCIPLE 4: Prioritize Accountability and Sustainability.**

PCLOB will endeavor to prioritize accountability and sustainability in developing and managing DEIA projects and goals. In addition to maintaining a DEIA Team composed of staff from across the agency with the responsibility of recommending, assessing, and implementing DEIA initiatives approved by the Board, the agency endeavors to incorporate DEIA into organizational planning documents as appropriate.

---

<sup>3</sup> PCLOB employees are required to hold a TS/SCI security clearance, which can take a long time to process between when a conditional offer is made and an individual begins work for the agency. Additionally, the security clearance process, including documentation requirements and standards to obtain a TS/SCI clearance may be a barrier for individuals from historically underserved and immigrant communities.

<sup>4</sup> The Board Chair, or in the absence of Chair, the majority of the remaining Board Members, have hiring authority. See 42 U.S.C. § 2000ee(j).



PCLOB will consider how to obtain necessary resources to meaningfully advance DEIA initiatives across the agency. As a longer-term goal, the agency will also assess whether and how to incorporate DEIA elements into performance objectives or awards policies, setting the expectation that DEIA is a PCLOB priority to be implemented by every agency staff member.

Additionally, the agency will seek to promote transparency surrounding PCLOB's DEIA efforts. Externally, future efforts may include the development of a public DEIA hiring policy and updating vacancy announcements with inclusive language promoting DEIA values. The DEIA Team shall continue to develop a pilot mentorship program to engage with staff, support their career growth, and underscore the importance of DEIA across PCLOB.

---

**PRINCIPLE 5: Understand the Perspective of the PCLOB Workforce and the Public.**

PCLOB conducts oversight of, and provides advice to, other federal agencies, and does not deliver services directly to the public. However, the agency does work to inform the public, including meeting with stakeholders and conducting public events, and, under its Equity Action Plan pursuant to EO 13985, the PCLOB will seek to eliminate barriers to public participation. For example, PCLOB will consider partnerships that serve historically underserved communities, including colleges and universities, law schools, professional associations, etc., which could expand PCLOB's reach and access to PCLOB's public events.

By enhancing access to PCLOB's public events, the agency will enable individuals from historically underserved communities to learn about the PCLOB and its work to enhance privacy and civil liberties protections in federal counterterrorism programs. Expansion of awareness about the PCLOB and its activities could also open recruiting and hiring opportunities to individuals from historically underserved communities. The PCLOB will continue to evaluate opportunities, consistent with applicable law, to increase coordination, communication, and engagement with stakeholders, including historically underserved communities, as the agency continues to implement DEIA initiatives.

Additionally, the DEIA Team will work to improve the PCLOB employee experience. For example, PCLOB will endeavor to better understand what its employees need to do their jobs effectively and the different challenges employees manage outside of the workplace.



## PCLOB MATURITY MODEL

As provided in the Government-wide DEIA Strategic Plan, PCLOB will utilize a Maturity Model to assess the status and effectiveness of DEIA initiatives across the agency. The Maturity Model will enable PCLOB to meet its goal of focusing on continuous improvement of its DEIA initiatives.

SIGNALS OF MATURITY	LEVEL 1 Foundational Capacity	LEVEL 2 Advancing Outcomes	LEVEL 3 Leading and Sustaining
<b>DEIA approach</b>	Focused on complying with nondiscrimination legislation and regulatory requirements.	DEIA initiatives yielding improved results and outcomes driven by dedicated resources, strategic planning, goal setting and evaluation. Agency practices promote the values of DEIA, but DEIA may not yet be integrated across agency mission and strategic planning.	DEIA is an integral part of overall agency mission, vision, values, strategy, policies, and practices. Systematic implementation of DEIA driven through goal setting, data-driven analysis, and continuous improvement. Agency undertakes structural reforms of policies and practices to mitigate barriers, if any.
<b>Diversity framework</b>	Definition of diversity confined to EEO categories.	Inclusive definition of underserved communities.	Connecting, interrelated approach embraces multiple identities.
<b>Organizational structure</b>	DEIA work may be under-resourced within the organization and/or decentralized across the agency.	DEIA work integrated across EEO, HR, civil rights, and D&I program offices.	DEIA work fully resourced and led at highest levels of agency leadership with significant and sustained senior level responsibility.
<b>DEIA integration</b>	DEIA work may be siloed within the agency and/or disconnected from mission and strategic planning.	DEIA goals reflected in agency strategic planning.	DEIA goals fully and strategically integrated with agency strategic planning, performance management, and learning agendas.

The following pages outline the three levels of PCLOB’s Maturity Model.



## **LEVEL 1: FOUNDATIONAL CAPACITY**

The initial stage of PCLOB’s maturity model has been focused on developing a foundational capacity to implement the core DEIA principles. Activities in this level might include the following steps, several of which are already underway:

- ❖ Formation of a PCLOB DEIA Assessment Team to complete the agency’s self-assessment and identify potential areas of focus.
- ❖ Development of an initial agency DEIA Strategic Plan.
- ❖ Formation of a PCLOB DEIA Team to develop a foundational DEIA infrastructure at the agency.
- ❖ Assessment and update of all existing policies, procedures, and practices for any needed revisions.
- ❖ Determination of whether additional policies and procedures are required to meet DEIA goals and initiation of work to develop, approve, and implement any such mechanisms over the next four years.
- ❖ Development and implementation of data collection models to inform DEIA initiatives.
- ❖ Evaluation of staffing levels to determine if additional staff is needed to manage and implement PCLOB equal employment and diversity initiatives.

## **LEVEL 2: ADVANCING OUTCOMES**

The second stage of PCLOB’s maturity model will move beyond compliance and focus on developing additional DEIA initiatives and implementing them throughout the agency. Additional activities in this level might include:

- ❖ Collection of data to assess the effectiveness of the DEIA actions initiated during Level 1 and inform additional DEIA initiatives across the agency.
- ❖ Collection of data to inform additional DEIA initiatives across the agency, engaging a broader assessment of accessibility and equity for employees with disabilities.
- ❖ Completion and implementation of new policies and procedures identified for development in Level 1.
- ❖ Implementation of additional cross-agency DEIA training measures.
- ❖ Initiation of efforts to address any pay equity issues that may be identified through the pay equity audit conducted in Level 1.
- ❖ Further integration of DEIA principles into the agency’s mission oversight and advice projects, as appropriate.



### **LEVEL 3: LEADING AND SUSTAINING**

The final stage of PCLOB’s maturity model will focus on integrating DEIA principles into the agency’s mission, policies, and strategic planning with the goal of achieving PCLOB’s DEIA mission of incorporating DEIA principles into its advice and oversight projects. Additional activities in this level might include:

- ❖ Expansion on data collection efforts performed in Level 2 with prioritized focus on continuous improvement of DEIA agency program.
- ❖ Incorporation of DEIA principles throughout the agency’s advice and oversight work, as appropriate. Advice and oversight projects are the primary ways the agency accomplishes its mission, so the consideration of DEIA in the exercise of its official mandate is the most direct way the PCLOB can ensure advancing DEIA core principles are a systematic part of agency operations.

## **PCLOB WORKPLACE SAFETY AND HARASSMENT PREVENTION AND RESPONSE PLAN**

In accordance with EO 14035 and as provided in the Government-wide DEIA Strategic Plan, agencies must adopt a comprehensive framework to prevent and address workplace harassment, including updating policies and practices; promoting multiple mechanisms for reporting misconduct, including anonymous reporting; promoting respectful workplaces and bystander intervention; improving training and monitoring; and creating a culture that does not tolerate workplace harassment, discrimination, or retaliation. The following Workplace Safety and Harassment Prevention and Response Plan meets these requirements.

PCLOB strives to ensure that its employees are treated with dignity and respect, and PCLOB’s Board Members and senior leadership are committed to maintaining a safe, respectful, and inclusive workplace. In addition to preventing and addressing workplace harassment and retaliation, this includes providing support for employees who have experienced domestic violence, sexual assault, or stalking. Further, the Board Members and senior leadership appreciate that all forms of harassment, take place as part of a continuum of harm, and that prevention and accountability are critical in reducing the risk of further harm in the workplace.



As a micro-agency with limited resources and a small staff, PCLOB has incrementally built its workplace safety and harassment prevention policies and practices. While the agency is in full compliance with the law, PCLOB will consider additional policies and practices to further establish a strong foundation for a comprehensive Workplace Safety and Harassment Prevention and Response Plan.

## **CORE PRINCIPLES**

PCLOB will strive to advance the following core principles to enhance workplace safety and anti-harassment. Through the PCLOB's DEIA Team, the agency will consider and adopt recommendations to implement priorities designed to advance these core principles.<sup>5</sup>

### **1. Committed and Engaged Leadership.**

As noted previously, the PCLOB Board Members and senior leadership are committed to maintaining a safe, respectful, and inclusive workplace. PCLOB leadership will demonstrate its commitment to maintaining a culture in which harassment is not tolerated by beginning to implement the following priorities:

- ❖ Evaluate whether additional staffing is needed to manage and implement PCLOB equal employment and DEIA initiatives.
- ❖ Develop effective training on PCLOB's anti-harassment policy and complaint process.
- ❖ Regularly train all Board Members and staff on the PCLOB anti-harassment policy and complaint process.

### **2. Consistent and Demonstrated Accountability.**

PCLOB Board Members and senior leadership are responsible for the implementation of sound policies and practices to prevent and address allegations of harassment, discrimination, and retaliation. Accordingly, PCLOB will begin implementing the following accountability priorities:

- ❖ Take steps to update and provide relevant educational resources to supervisors and all employees, and make resource readily available through multiple channels such

---

<sup>5</sup> As noted previously, PCLOB is a micro-agency with limited resources and a small staff. PCLOB will continue to assess budgetary, personnel, training, other necessary resources to enhance its DEIA initiatives.



as hotlines and employee assistance services.

- ❖ Promote employee assistance programs, work-life programs, and availability of mental health resources.
- ❖ Promptly and appropriately address any concerns or complaints pursuant to the anti-harassment policy, reporting and investigation process, and/or training.

### **3. Strong, Comprehensive, and Consistently Applied Anti-Harassment Policy.**

The PCLOB strives to have a strong, comprehensive, and consistently applied anti-harassment policy. PCLOB's policy prohibits harassment based on any legally protected characteristic. PCLOB will continue its self-assessment process and determine whether its anti-harassment policy and practices should be updated to include the following:

- ❖ Conducting regular climate surveys to assess discrimination, harassment, and retaliation.
- ❖ Providing mechanisms for anonymous reporting of harassment as well as additional mechanisms for reporting misconduct.

### **4. Trusted and Accessible Complaint Procedures.**

As a micro-agency with limited resources and a small staff, PCLOB must rely on the shared services of another government agency for investigations of any complaints of harassment. However, PCLOB maintains responsibility for ensuring that the investigation process is easy to understand and access. Additionally, to enhance the accessibility and trustworthiness of PCLOB's complaint and investigation procedures, PCLOB has confirmed that the agency's shared service provider for harassment investigations is:

- ❖ Providing training to investigators to perform their functions promptly, fairly, and in a trauma-informed manner.
- ❖ Collecting data on complaints of discrimination, harassment (including sexual harassment), and retaliation.
- ❖ Tracking complaints related to discrimination, harassment, and retaliation.





## **5. Regular, Interactive, and Tailored Training.**

As PCLOB's DEIA program matures, the agency will endeavor prioritize regular, interactive, and tailored training in the following ways:

- ❖ Develop effective training on PCLOB's anti-harassment policy and complaint process.
- ❖ Regularly train all Board Members and staff on the PCLOB anti-harassment policy and complaint system.
- ❖ Track compliance with training requirements.

## **DOMESTIC VIOLENCE, SEXUAL ASSAULT, OR STALKING**

PCLOB is committed to providing support to employees who have experienced domestic violence, sexual assault, or stalking (DVSAS). PCLOB will continually evaluate and assess federal government guidance and seek to develop support measures for employees who have experienced DVSAS. As part of that review and development process, PCLOB will consider workplace flexibilities, building safety and security, and other components of support. PCLOB also intends to issue a policy on addressing DVSAS in the workplace consistent with Presidential Memorandum, Establishing Policies for Addressing Domestic Violence in the Federal Workforce, April 18, 2012.