



## INTELLIGENCE COMMUNITY DIRECTIVE

110

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ICD 110

### Diversity, Equity, Inclusion, and Accessibility

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**A. AUTHORITY:** The National Security Act of 1947, as amended; Executive Order (EO) 12333, as amended; EO 14035; and other applicable provisions of law.

#### **B. PURPOSE**

1. This Intelligence Community Directive (ICD) establishes policy to:
  - a. Promote diversity, equity, inclusion, and accessibility (DEIA) as a means of enhancing the ability of the Intelligence Community (IC) to perform its mission;
  - b. Ensure that equity and accessibility are core components of management and policy processes in the IC;
  - c. Standardize the IC approach to collecting, processing, analyzing, and reporting demographic data; and
  - d. Promote a data-driven approach where evidence informs IC actions to achieve DEIA-related goals, processes, and outcomes.
2. This ICD supersedes ICD 110, *Intelligence Community Equal Employment Opportunity and Diversity*, dated 1 July 2009.
3. This Directive further establishes roles and responsibilities of the Chief of Intelligence Community Diversity, Equity, Inclusion, and Accessibility (IC DEIA), the IC DEIA Council, and the IC Accessibility Governance Council.

#### **C. APPLICABILITY**

1. This Directive applies to the IC, as defined by the National Security Act of 1947, as amended, and to such other elements of any department or agency as may be designated by the President, or designated jointly by the Director of National Intelligence (DNI) and the head of the department or agency concerned, as an element of the IC.
2. For the purposes of this policy, the terms used herein are defined in the Appendix.

#### **D. POLICY**

1. The IC shall prioritize DEIA initiatives as mission-essential. It is fundamental to national security that the IC workforce reflects and understands the nation it serves. Further, the IC shall be a model for DEIA, where all employees are treated with dignity and respect.

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2. The IC is committed to a workplace free from discrimination on the basis of an individual's race, color, sex (including pregnancy, sexual orientation, and gender identity), national origin, religion, age (40 and over), disability, veteran or military status, parental status, protected genetic information, or any other basis protected by applicable law or EO.

3. The IC shall, consistent with law, and, to the greatest extent permissible, federal merit system principles, endeavor to achieve a workforce from all segments of society and ensure all employees and applicants for employment receive fair and equitable treatment in all aspects of personnel management. The IC shall prioritize its commitment to underserved communities through the development and implementation of DEIA best practices, and proactively identify and remove barriers to equal opportunities (e.g., recruitment, hiring, retention, career development, promotions, awards, etc.).

4. The Chief, IC DEIA is the Accountable Official for this policy and shall issue IC Standards (ICS) in accordance with IC Policy Guidance (ICPG) 101.2, *Intelligence Community Standards*, as necessary, to implement this Directive.

5. The Chief, IC DEIA shall serve as the Principal Advisor to the DNI on all matters related to DEIA and the IC, and in this role serves as the subject matter expert for White House initiatives, other DEIA programs, and requests from other appropriate oversight bodies.

6. The Chief, IC DEIA shall develop an IC DEIA joint strategy to identify, promote, and track progress towards IC-wide DEIA goals, processes, and outcomes.

#### 7. *Partnerships*

a. The IC DEIA Council, chaired by the Chief, IC DEIA, shall serve as the primary IC governing forum to exchange DEIA ideas, best practices, issues and concerns, and for coordination, assessment, and advancement of IC-wide DEIA initiatives.

(1) The Chief, IC DEIA shall develop and maintain an IC DEIA Council Charter in accordance with ES 2021-01996, *IC Charters*.

(2) The IC DEIA Council will be composed of IC element senior DEIA representatives, or designees, who are authorized to make decisions on behalf of their element.

b. The IC Accessibility Governance Council, chaired by the Chief, IC DEIA, or designee, shall serve as the primary IC governing forum for coordinating, evaluating, recommending, and improving accessibility management (to include but not limited to facilities, information technology, human resources, security, reasonable accommodations, neurodiversity literacy, and health services/awareness, to include mental health) processes, programs, policies, and procedures. The Council shall collaborate with other IC governance forums leading related topics of interest.

(1) The Chief, IC DEIA, or designee, shall develop and maintain the IC Accessibility Governance Council Charter in accordance with ES 2021-01996.

(2) The IC Accessibility Governance Council will be composed of IC element senior accessibility representatives, or designees, who are authorized to make decisions on behalf of their element.

c. IC elements shall proactively engage with and develop employee resource groups (or similar groups) to promote DEIA awareness, identify DEIA-related progress and challenges, and implement best practices for institutional integration within the element. The Chief, IC DEIA will provide oversight of IC Affinity Networks (ICAN).

d. IC elements shall identify outreach and engagement opportunities and expand the pathways to recruit and hire a workforce representing all segments of society.

e. IC elements shall establish or expand partnerships with academia, the private sector, and other institutions to inform best practices and create transparency on IC DEIA initiatives.

#### 8. *Inclusivity and Accessibility*

a. IC elements shall advance and maintain DEIA, consistent with applicable provisions of law and policy, including, but not limited to:

(1) *Employment of Individuals with Disabilities.* IC elements shall ensure accessibility for their workforces by providing assistive technology, services, and work areas for employees who identify as persons with disabilities. IC elements shall adhere to the applicable provisions of federal equal employment opportunity (EEO) laws and regulations, provide equal opportunity in employment for all persons, and prohibit discrimination on the basis of disability. Equal opportunity in employment includes hiring, placement, and advancement opportunities; and

(2) *Gender Identity and Inclusivity in the IC.* IC elements shall promote a diverse, equitable, and inclusive workplace, irrespective of gender identity, transgender status, gender expression, and perceived gender in accordance with ICD 125, *Gender Identity and Inclusivity in the Intelligence Community.*

b. IC elements shall, to the maximum extent practicable, develop, procure, maintain, and use electronic and information technology (IT) systems that are accessible to employees who identify as persons with disabilities, as described in Section 508 of the Rehabilitation Act. IC IT systems shall, to the extent practicable, be gender inclusive in accordance with ICD 125.

#### 9. *Workforce Initiatives and Training*

a. IC elements shall develop initiatives to promote inclusion and equity.

b. IC elements shall encourage workforce participation in DEIA activities such as training, events, or membership in employee resource groups, and reward or recognize efforts to promote DEIA initiatives.

c. To foster an inclusive work environment and an informed workforce, IC elements shall provide DEIA awareness training on a routine basis. IC DEIA, in coordination with the

Chief, IC Human Capital (IC HC), shall develop DEIA awareness training and make it available for use to the IC elements.

#### **E. DATA COLLECTION, PROCESSING, ANALYSIS, AND REPORTING**

1. The IC shall use a data-driven approach to measure, report, and remedy disparities or barriers that may exist, establish and carry out strategic initiatives in DEIA, and track progress of DEIA activities.

2. The IC shall standardize its approach to collecting, processing, analyzing, and reporting demographic data including, but not limited to, workforce composition, applicants, hiring, promotion, and attrition for the IC Annual Demographic Report and other mission needs.

a. IC elements shall only use collected data in studies and analyses that contribute affirmatively to achieving the objectives of this Directive.

3. Data-driven approaches, including data collection, processing, analysis, and reporting, shall comply with all applicable laws, policies, and other requirements to protect civil liberties and privacy.

4. IC elements shall collect, process, analyze, and report DEIA-related applicant and IC workforce data to:

a. Fully understand the composition of the IC workforce and its demographic cross-sections, identify and report on any areas of underrepresentation and trends over time, conduct barrier analyses, and establish DEIA strategic goals;

b. Measure and assess the efficacy of DEIA and human capital programs and policies in expanding the diversity, equitability, and inclusivity of the IC workforce;

c. Benchmark the IC workforce to the relevant non-federal and federal labor forces;

d. Inform human resource strategies to equitably recruit, hire, promote, and retain a workforce that represents all segments of society;

e. Understand the full range of identities that comprise the IC and assess drivers of underrepresentation;

f. Facilitate transparency and accountability through comprehensive and accurate reporting; and

g. Ascertain the rates of hiring, retention, and promotion of underserved communities at both the IC and IC element level through a cross-sectional analysis of the IC workforce.

5. *Confidentiality.* Personally Identifiable Information and medical information will be treated in accordance with the Privacy Act and other applicable laws and policies on confidentiality and privacy, and will be accessible only to those with a need to know. Consistent with law and policy, unauthorized disclosure or misuse of protected data may result in disciplinary action and/or criminal penalties.

6. IC elements shall proactively engage with the workforce to understand whether or how DEIA issues impact the workplace (e.g., exit surveys, IC Climate Survey, employee resource groups, etc.). Data collection shall not be limited to the collection of demographic data as described Section E.7 below.

#### 7. *Demographic Data*

a. IC elements shall use defined data standards to collect and maintain demographic data on each applicant and IC employee (herein “disaggregated data”) from the date of application to the date of separation from the element to modernize, streamline, standardize, and improve consistency in reporting workforce data. For the purposes of this policy, demographic data includes information about the employee or applicant, and information about an employee’s career lifecycle. Individuals shall be assigned a unique identification number for recording purposes. This unique identification number may be omitted or modified for anonymization when reporting demographic data.

b. IC elements shall collect disaggregated demographic data and report on such data about each individual applicant and employee and should include age or date of birth, race, ethnicity, citizenship type, national origin, sex, gender identity, sexual orientation, veteran or military status, and disability status.

(1) IC elements shall clearly communicate whether providing such data is voluntary, the purposes and intended use of the data, and the legal and policy protections related to the data.

(2) IC elements shall not assign a default demographic category for any demographic data field for which the applicant or employee does not provide a response. In such situations, IC elements may indicate no response through the use of “null,” “blank,” etc.

(3) IC elements shall not use demographic data for employment purposes in a way that discriminates on the basis of an individual’s race, color, sex (including pregnancy, sexual orientation, and gender identity), national origin, religion, age (40 and over), disability, parental status, protected genetic information, or any other basis protected by applicable law or EO. This prohibition does not impact the element’s authorities to use demographic data necessary in the normal course of business for authorized mission needs, such as for the processing of security clearances, benefits, etc.

c. IC elements shall collect, analyze, and report data on an employee’s career lifecycle, including job positions, joint duty assignments, pay grades, awards, promotions, training, competitive learning opportunities, etc.

d. IC elements shall provide applicants and employees with the ability to update or change their demographic data. Any updates must be made by the individual through direct system access or at the individual’s request. IC elements shall minimize the burden on an individual of collecting and maintaining demographic data by streamlining and reducing duplicative reporting where possible.

8. IC elements shall provide anonymized, disaggregated demographic data to the Chief, IC DEIA, as requested, to support annual IC-wide, cross-sectional analysis and reports of

demographic data. Such reporting will provide better insight and more transparency into the experiences of a diverse IC workforce, assess progress towards DEIA initiatives, and better inform IC strategic goals.

a. Access to disaggregated demographic data shall be restricted to personnel with a mission need to know and handled in accordance with Section E.5 above.

b. IC elements shall preserve the original or updated data provided by an applicant or employee and ensure that any process used to aggregate or analyze data (e.g., recoding, anonymizing, etc.) does not replace the data provided by the individual. Data reported in summary form (herein “aggregated data”) shall accurately represent the underlying disaggregated data.

c. If the reporting or products include demographic data specific to an IC element, the Chief, IC DEIA shall validate the data with the respective IC element to ensure that the data is accurate and consistent with other reporting mechanisms.

9. IC elements shall provide to their workforce aggregated demographic data and information regarding the state of DEIA within their elements, and develop an unclassified report that is available to the public to support transparency in accordance with EO 14035 and Presidential Memorandum, *Promoting Diversity and Inclusion in the National Security Workforce*.

## **F. ROLES AND RESPONSIBILITIES**

1. The Chief, IC DEIA shall:

- a. Lead the advancement and synchronization of DEIA initiatives in the IC, including:
  - (1) Development of IC-wide DEIA strategic goals and programs;
  - (2) Prioritization of IC-wide commitment to underserved communities through the development and implementation of DEIA best practices; and
  - (3) Alignment of DEIA initiatives to law, and, to the greatest extent permissible, federal merit system principles.
- b. Serve as the Accountable Official for this ICD and, as necessary, develop and issue ICS in accordance with ICPG 101.2, *IC Standards*;
- c. Serve as the Principal Advisor to the DNI on DEIA-related matters;
- d. Develop an IC DEIA joint strategy that establishes implementation objectives and timeframes for IC elements to ensure accountability. The joint strategy shall be coordinated through the IC DEIA Council, no less than every three years;
- e. Chair the IC DEIA Council and develop and maintain its charter in accordance with Section D.7.a;


- f. Chair the IC Accessibility Governance Council and develop and maintain its charter in accordance with Section D.7.b;
- g. Expand partnerships across the IC, as well as academia, public and private sectors, and other institutions to expand hiring pathways, inform best practices, and create transparency;
- h. Provide oversight of the ICANs including:
  - (1) Reviewing charters and progress towards annual objectives;
  - (2) Synchronizing activities and initiatives with IC DEIA programming and goals;
  - (3) Requesting ICAN support for IC DEIA activities and data collection efforts. When requesting ICAN support, individual ICAN members will remain subject to the direction and control of their IC element; and
  - (4) Leveraging ICAN recommendations.
- i. Coordinate with the Chief, IC HC on IC human capital programs and initiatives related to DEIA matters;
- j. Lead the strategic development and implementation of accessibility programs across the IC;
- k. Advance and maintain DEIA consistent with applicable laws and policies;
- l. Ensure accessibility of IC-wide DEIA initiatives for persons with disabilities;
- m. Coordinate with the Chief, IC HC to develop and integrate DEIA elements in the employee lifecycles that support participation in DEIA activities, such as training, events, or membership in employee resource groups and rewarding or recognizing efforts to promote DEIA initiatives;
- n. Coordinate with the Chief, IC HC to develop and conduct DEIA awareness training that is available to the IC;
- o. Conduct professional development training to institutionalize and operationalize DEIA best practices across the IC;
- p. Provide informational materials, guidance, and support to IC elements regarding best practices and promote DEIA initiatives and activities;
- q. Promote an IC-wide, data-driven approach where evidence informs strategic IC DEIA goals, processes, and programs;
- r. Coordinate with the Chief, Office of Civil Liberties, Privacy, and Transparency (CLPT) to ensure data collection, processing, analysis, and reporting efforts adhere to applicable civil liberty and privacy laws and policies in accordance with Section E;
- s. Establish demographic data standards to ensure consistent collection, reporting, and interoperability of data across IC IT systems in accordance with applicable laws and policies;

- t. Conduct IC-wide data collection, analysis, and reporting, including workforce demographics and trends, to identify and address barriers to IC-wide DEIA efforts;
  - u. Coordinate with IC elements to validate data is accurate and consistent with other reporting mechanisms;
  - v. Lead and produce an annual report for the DNI which includes aggregated IC workforce demographic data, including cross-sectional analysis of such data, and provides information on the composition of the IC workforce, barrier analysis, and other information on the state of DEIA advancement in the IC; and
  - w. Coordinate with the Chief, IC HC to streamline and reduce duplicative reporting where possible.
2. The IC Chief Information Officer shall issue guidance to implement inclusive and accessible IT systems in accordance with Section D.8.b.
3. The IC HC shall:
- a. Establish best practices for recruitment, hiring, and retention of a diverse workforce;
  - b. Coordinate with the Chief, IC DEIA to develop an IC DEIA awareness training; and
  - c. Coordinate with the Chief, IC DEIA on IC human capital programs and initiatives related to DEIA matters, and reduce duplicative human capital and DEIA reporting where possible. Coordination will also include Chief, CLPT when programs or initiatives involve civil liberties, privacy, and transparency matters, including the collection and handling of data.
4. IC elements shall:
- a. Issue or revise internal policies to align and comply with this ICD;
  - b. Develop strategic plans, complete with objectives, time frames, and responsibilities, in alignment with the IC DEIA joint strategy to routinely identify and take steps towards eliminating barriers to workforce diversity;
  - c. Provide progress updates to the Chief, IC DEIA, as requested, to measure progress towards IC-wide diversity goals in the IC DEIA joint strategy and IC Maturity Model;
  - d. Provide the Chief, IC DEIA with responses to address DEIA-related inquiries and taskings, including Congressionally Directed Actions, action plans for White House initiatives, and requests from other appropriate oversight bodies;
  - e. Designate a senior DEIA representative, or designee, to serve on the IC DEIA Council;
  - f. Designate an Accessibility representative, or designee, to serve on the IC Accessibility Governance Council;



- g. Proactively engage with and develop employee resource groups, promoting DEIA awareness; identify DEIA-related progress and challenges; and implement best practices for institutional integration within the element;
- h. Identify, attend, foster, and measure outcomes for outreach and engagement opportunities with academia, the private sector, and other institutions to recruit and hire a broader workforce that represents all segments of society;
- i. Establish, expand, and measure outcomes for partnerships with academia, the private sector, and other institutions to inform best practices in progressing DEIA;
- j. Advance and maintain DEIA consistent with applicable provisions of law and policy;
- k. Ensure accessibility for their respective workforces by providing assistive technologies, services, and work areas for employees who identify as persons with disabilities;
- l. To the maximum extent practicable, develop, procure, maintain, and use electronic IT systems that are accessible to persons with disabilities, as described in Section 508 of the Rehabilitation Act. IC IT systems shall, to the extent practicable, be gender inclusive in accordance with ICD 125;
- m. Encourage workforce participation in DEIA-related activities and initiatives;
- n. Provide workforce DEIA training in accordance with Section D.9.c;
- o. Use a data-driven approach to identify gaps and monitor progress of DEIA strategic plan;
- p. Collect workforce data in accordance with IC DEIA data standards and applicable laws and policies on confidentiality, privacy, and civil liberties;
- q. Provide anonymized, disaggregated demographic data to the Chief, IC DEIA as requested, to support IC-wide cross-sectional analysis of demographics and DEIA initiatives;
- r. Coordinate with the Chief, IC DEIA to ensure data is accurate and consistent with reporting mechanisms; and
- s. Publish aggregated demographic data and the state of DEIA to the workforce and through unclassified channels to support transparency.

**G. EFFECTIVE DATE:** This Directive becomes effective on the date of signature.

  
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Director of National Intelligence

October 24, 2024  
Date

## Appendix – Definitions

For the purposes of this ICD, the following terms are defined in accordance with EO 14035, *Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*.

**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. Accessibility includes the provision of accommodations and modifications to ensure equal access to employment 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.

**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.

**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 belonging 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, queer, gender non-conforming, and 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.