

STATE OF WISCONSIN DEPARTMENT OF VETERANS AFFAIRS

EQUITY AND INCLUSION PLAN

JANUARY 1, 2024 - DECEMBER 31, 2026





STATE OF WISCONSIN DEPARTMENT OF ADMINISTRATION

Tony Evers, Governor Kathy Blumenfeld, Secretary Jen Flogel, Division Administrator

December 19, 2023

Dear Secretary Bond,

This letter serves as both the approval of Department of Veterans Affairs' Equity and Inclusion (EI) plan for January 1, 2024 - December 31, 2026, and a celebration of the agency's commitment to continued development of a workforce designed to meet the needs of Wisconsin citizens.

El plans are intended to be transparent documents so please be sure to post your approved plan on the agencies' intranet and internet pages.

While your plan is now approved, please remember that EI plans are living documents and should remain current. If you have any updates to your plan such as when a major initiative is added or removed, please submit the amended document to BEI email <u>DOADPMBEI@wisconsin.gov</u>. Once approved, you will receive an updated letter of approval.

We look forward to seeing the results from the execution of your plan including improved recruitment and retention of a diverse, innovative, knowledgeable, and talented workforce, advancement of an inclusive culture promoting a sense of belonging for state employees, and development of a workforce from the inside out that understands the needs of Wisconsin citizens and provides the best in customer service.

Sincerely,

Jen Flogel Administrator Division of Personnel Management

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Acknowledgment

We have reviewed and firmly endorse the content of this equity and inclusion plan. We are committed to ensuring equal employment opportunity, freedom from discrimination, and affirmative action in compliance with state laws and policies, as well as federal laws. By formally integrating equity and inclusion values and practices into existing processes, the Equity and Inclusion Plan enables progress and results to be measured agency wide.

Appointing Authority: James Bond	Signature/Date: James Bowd james.bond@dva.wisconsin.gov
Secretary-designee	james.bond@dva.wisconsin.gov
Equity and Inclusion Officer: Racheal Harris Racheal.Harris@wisconsin.gov	Signature/Date: Rocusigned by 12/18/2023 10:49 AM C Rochard Horris
Date of submission to DPM/BEI:	12/18/2023 10:49 AM CST

Each individual or group listed below contributed to the development of the plan. Implementation Team Members:

Christopher McElgunn, Deputy Secretary Shannon Miller, Marketing and Outreach Supervisor Leslie Busby-Amegashie, Veterans Benefit Specialist 2 Matthew Niehaus, IS Business Automation Senior Larry Graves, Education Consultant Ilona Grawvunder, Therapy Assistant-Obj Lane Dombrowski, Nurse Clinician 2 Patrick Meyer, Custodial Services Program Supervisor Emily Pollock, Veterans Benefit Specialist 2 Kristy Hartke, Operations Program Associate Kris Ward, Auditor-Advanced Russell Horton, Reference & Outreach Archivist Marina Johnstone, Operations Program Associate

Contributors and other subject matter experts consulted:

Racheal Harris, Human Resources Program Manager – Equity & Inclusion Wendy Copus, Region 4 Human Resources Director Mindy Allen, Administrative Rules Coordinator

Wisconsin Department of Veterans Affairs Equity and Inclusion Commitment Letter

The Wisconsin Department of Veterans Affairs hereby reaffirms our commitment to the principles of equity and inclusion for all employees and applicants without regard to an individual's race, color, sex, religion, national origin, age, disability, genetic information, or marital status.

The Wisconsin Department of Veterans Affairs is firmly committed to meeting the state laws and policies, as well as federal laws for equal employment opportunity and affirmative action. The Wisconsin Department of Veterans Affairs recognizes that equal employment opportunity is a legal, organizational, and economic necessity to ensure equity and diversity of the state's workforce. This commitment extends to all job applicants and employees in every type of position, including unclassified, classified, project, limited-term, volunteers, interns, and work-study personnel.

As part of the Wisconsin Department of Veterans Affairs commitment to this overall process, we intend to apply equity and inclusion principles to all applicable employment policies, procedures, and programs to ensure equal employment opportunity and freedom from discrimination, including recruitment, selection, job assignment, training, compensation, benefits, discipline, promotion, transfer, layoff, and termination processes. Employees and applicants with disabilities will receive reasonable accommodation.

The Wisconsin Department of Veterans Affairs has developed and is committed to maintaining a written Equity and Inclusion Plan. This Equity and Inclusion Plan has my total support, and the Wisconsin Department of Veterans Affairs pledges it's best good faith efforts to achieve the goals identified in the Equity and Inclusion Plan. I expect each manager, supervisor, and employee of the Wisconsin Department of Veterans Affairs to aid in the implementation of this program and be accountable for complying with the objectives of this Equity and Inclusion Plan.

The Wisconsin Department of Veterans Affairs will maintain a monitoring and reporting system to ensure compliance with the equity and inclusion mandates. The plan is available for review on the Wisconsin Department of Veterans Affairs website or at the Human Resources office.

We look forward to working with the Division of Personnel Management, Bureau of Equity and Inclusion, to implement our policies and programs to correct the present effects of past discrimination and build a motivated and skilled workforce that reflects the population we serve.

Agency Head Name: James Bond	Signature: James Bond
Agency Head Title: Secretary-designee	DB6F9B70C91A41B
Date: 12/18/2023 4:04 PM CST	
DPM Equity and Inclusion Officer Name: R	Cacheal Harris
Date: 12/18/2023 10:49 AM CST	Signature: Rochest Horris

Individuals Responsible for Directing/Implementing the Equity and Inclusion Plan

Agency Appointing Authority

The state agency appointing authority is responsible for establishing an Equity and Inclusion Program, including goals, timetables, and compliance with all federal and state laws and regulations. The Appointing Authority:

- Communicates the direction and vision to agency leadership that ensures involvement and commitment to the agency's equity and inclusion efforts.
- Develops an equity and inclusion action plan to implement strategies that will comply with affirmative action, equity, and inclusion requirements, build infrastructure and culture committed to equity and inclusion, and incorporates equity and inclusion throughout the agency's work and public service.
- Engages a representative employee and stakeholder group in the planning and development process for the EI plan to review equity and inclusion-related data, recommends opportunities for improvement, and provides support and shared ownership of agency strategies and desired outcomes.
- Ensures that designated personnel responsible for equity and inclusion efforts and programs are given the authority, top management support, and resources to implement their assigned responsibilities successfully.
- Assesses and ensures internal workplace policies and procedures are equitable, culturally responsive, and promote inclusion.
- Provide professional development opportunities and resources that raise awareness, build knowledge and understanding, and encourage and promote an inclusive culture.
- Seeks advice and guidance from the Equity and Inclusion Advisory Committee on agency El programs, initiatives, and policies.

Name of individual(s) responsible

Name: James Bond

Title: Secretary-designee

Email: james.bond@dva.wisconsin.gov

Phone: 608.266-1315

Equity and Inclusion Officer

As delegated, the Equity and Inclusion Officer (EIO) or designee is directly responsible for developing, coordinating, and implementing the agency's EI plan. The Equity and Inclusion Officer:

- Plans, guides, and advises the appointing authority and executive leadership in establishing and maintaining equity and inclusion plans, programs, and policies. This responsibility includes engaging the appropriate individuals and stakeholders throughout the development and implementation and continuous improvement activities of plan actions.
- Develops, coordinates, and implements equity and inclusion initiatives that support the agency's equity and inclusion plan goals.
- Keeps the agency head and leadership at various organizational levels informed of EI developments, progress, and potential concerns.
- Ensures communication and dissemination of equity and inclusion plan, policy and program information, and employee access to the plan and related policies.
- Works with leadership to identify, coordinate, facilitate, or provide equity and inclusion training to increase awareness, support, and maintain compliance.
- Establishes and maintains internal monitoring, auditing, and reporting system to measure the effectiveness of the agency's programs and activities, ensure compliance, and meet state and federal requirements. This review includes gathering, researching, and analyzing data.
- Audit the hiring and promotion patterns and the selection of candidates for career development and training programs to remove barriers.
- Ensures agency selection criteria are objective, uniform, and job-related and that personnel decision-making processes adhere to EEO and AA principles.
- Promotes and coordinates agency participation in enterprise equity and inclusion programs and initiatives, including the State Student Diversity Internship program, the annual state Diversity Awards, the noncompetitive appointment for certain disabled veterans' program, the W-2 program, the disabled veteran's program, etc.
- Serves as the agency's point of contact for professional organizations and community groups to promote and assist with employment opportunities for underrepresented groups.
- Attends at least 12 hours of equity and inclusion training annually.
- Attends equity and inclusion and agency supervisory training.
- Participates in and advises the agency's Equity and Inclusion Committee as a nonvoting member.

Name of individual(s) responsible

Name: Racheal Harris Title: Region 4 Equity and Inclusion Program Officer

Email: Racheal.Harris@wisconsin.gov Phone: 262.878-6752

Equity and Inclusion Professional

The designee/professional is responsible for assisting with implementing the equity and inclusion plan efforts within their agency. The EI designee/professional:

- Ensures dissemination of all relevant equity and inclusion information to appropriate staff.
- Reviews policies, procedures, and practices and recommends changes to the EIO.
- Assists in developing, implementing, and managing oversight of policies, programs, and procedures for the administration of EI efforts for the agency.
- Assists with promoting and coordinating agency equity and inclusion programs and initiatives, including the State Student Diversity Internship program, the annual state Diversity Awards, the noncompetitive appointment for certain disabled veterans' program, the W-2 program, the disabled veteran's program, etc.
- Ensures communication and dissemination of equity and inclusion plan, policy and program information, and employee access to the plan and related policies.
- Assist the EI Officer in conducting periodic audits of recruitment activity to measure the effectiveness of efforts and activities to attain strategic equity and inclusion goals and objectives.
- Attends at least 6 hours of equity and inclusion training annually.
- Attends equity and inclusion and agency supervisory training.
- As designated, manages the agency's medical issues. This responsibility may include coordinating and monitoring the agency's FMLA and reasonable accommodation requirements to ensure compliance with the Americans with Disabilities Act (ADA).

Name of individual(s) responsible

Name: Jennifer Ginter-Lyght	Title: Equity & Inclusion Specialist		
Email: jennifer.ginterlyght@wisconsin.gov	Phone: TBD		

Executive HR Director and HR Manager

The Executive HR Director and HR Manager are responsible for ensuring equitable and consistent administration, applying all personnel policies, and providing resources, support, and supervision of the EI Officer and professionals. The Executive HR Director and HR Manager:

- Maintains effective working relationships with agency EIO officers and designees.
- Provides leadership to HR staff and others to ensure personnel decision-making processes adhere to affirmative action, equal opportunity, and equity and inclusion principles.
- Ensures the hiring managers and supervisors work effectively with the EIO to develop and execute the EI plan.
- Provides the EIO with the support and data necessary to perform duties and responsibilities related to equity and inclusion.

Name of Executive HR Director

Name: Wendy Copus	Title: Region 4 Human Resources Director
Email: Wendy.Copus@Wisconsin.gov	Phone: 608.267-1796
Name of HR Manager	
Name: Wendy Copus	Title: Region 4 Human Resources Director
Email: Wendy.Copus@Wisconsin.gov	Phone: 608.267-1796

Equity and Inclusion Planning and Development Team

The EI planning and development team is a representative group of agency employees selected by the appointing authority to assist with the planning and development efforts for the equity and inclusion plan. The EI Planning and Development Team:

- Reviews equity and inclusion-related data, gathers additional data as needed, recommends opportunities for improvement, and provides support and shared ownership of agency strategies and desired outcomes.
- Assists with developing, writing, rolling out, and monitoring the agency's EI Strategic Plan.
- Establishes a plan for regular communication regarding the El plan process, activities, and outcomes to build transparency, broad participation, and support.
- Monitors effectiveness of Equity and Inclusion Plan goals and outcomes.

List names of individuals role and responsibilities on the team:

Leslie Busby-Amegashie – Culture & Diversity Chair Shannon Miller – Retention Chair Matt Niehaus – Recruitment Chair Marina Johnstone - Culture & Diversity Team Member Kris Ward – Culture & Diversity Team Member Russ Horton – Culture & Diversity Team Member Larry Graves – Retention Team Member Ilona Grawvunder – Retention Team Member Lane Dombrowski – Retention Team Member Patrick Meyer – Recruitment Team Member Emily Pollock – Recruitment Team Member Kristy Hartke – Recruitment Team Member

Introduction

The Wisconsin Department of Veterans Affairs (WDVA) was created in 1945 to consolidate separate veterans' programs under one agency. Today, the WDVA provides benefits, grants, and services to eligible Wisconsin veterans and their families.

Programs included in the department's mission are the: Wisconsin Veterans Homes, Wisconsin Veterans Memorial Cemeteries, Veterans Administration Regional Claims Office, Military Funeral Honors Program, Veterans Outreach and Recovery Program (VORP), Veterans Housing and Recovery Program (VHRP), and the Wisconsin Veterans Museum. These programs are designed to provide health, educational assistance, economic assistance, and other services to specified veterans of the United States armed forces.

The Governor of Wisconsin nominates the Secretary of the Wisconsin Department of Veterans Affairs after consulting with the presiding officers of at least six Wisconsin Veterans organizations. The Governor's nomination of the Secretary must be confirmed by the Wisconsin State Senate. The department receives advice from a nine-member, part-time citizen advisory Board of Veterans Affairs.

The Department's organizational structure includes: The Office of the Secretary, the Office of Public Affairs, the Office of Legal Counsel, the Wisconsin Veterans Museum, the Division of Enterprise Services, the Division of Veterans Benefits, and the Division of Veterans Homes. The WDVA's mission is to work on behalf of Wisconsin's Veterans community — veterans and their families and survivors — in recognition of their service and sacrifice to our state and nation.

The Department of Veterans Affairs is committed to workforce demographics that mirror the veterans we serve and the citizens of the State of Wisconsin. By building a diverse and inclusive workforce, the agency will better serve and understand the veterans as well as the communities we provide services to. Recruiting and retaining employees of different genders, ethnicities, races, disabilities, and ages will help the department stay on track with other state agencies as well as embrace the communities where our facilities are located to help share the stories of Wisconsin veterans.

The Equity and Inclusion Plan was constructed by a volunteer group of employees in the Department of Veterans Affairs, along with WDVA leadership. Feedback was solicited from all WDVA employees on recruitment, retention, and cultural initiatives in order to build a more equitable and inclusive work environment. The feedback solicited from WDVA employees has built a solid framework and focuses on areas where the department can make substantial gains concerning equity and inclusion.

The volunteer team developed subcommittees to focus on three (3) specific areas: recruitment, retention, and culture/diversity. These committees began meeting weekly in July of 2023 and presented their findings and ideas to the larger group and WDVA leadership. Along with those findings, data was provided to the group relating to current workforce demographics, employee turnover statistics, and the State of Wisconsin Underutilization report.

While looking at the information provided by both employees and through reports, each subcommittee evaluated each claim to see if it was an overall department issue or a specific facility or division issue. Because of the composition of the department, the committees decided it was crucial to do overall department goals and goals specifically focused on the

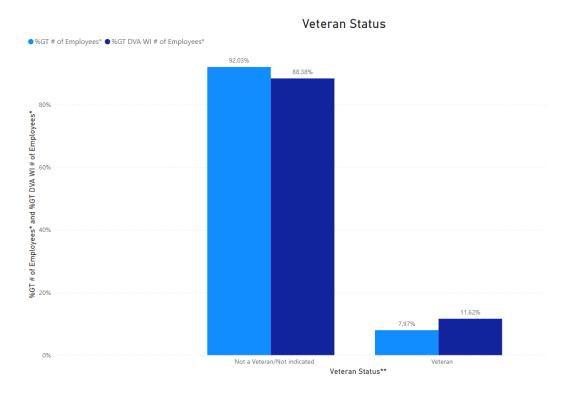
Wisconsin Veterans Homes. The Wisconsin Veterans Homes function solely as skilled nursing facilities and have their own unique struggles in today's climate and healthcare worker shortages; therefore, they need to be treated separately from the other areas of the department.

Once this was identified as the solution to some of the issues the committee was having with the overall E&I plan, the teams were able to focus to identify specific strategies and areas of focus, whether for the department as a whole or the Veterans Homes, that would impact the agency's ability to recruit and retain a diverse workforce and build an inclusive culture.

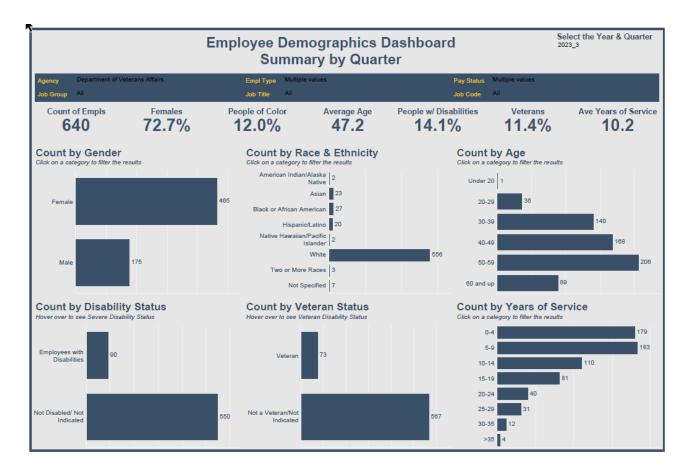
Workforce Analysis Summary

The WDVA self-assessment workforce analysis includes a variety of reports and metrics tables to determine areas within the agency that can be impacted through recruitment, retention, and culture. The fact-finding analysis shows areas of concern that are addressed in the agency's Equity and Inclusion Plan.

 Upon reviewing the 2023 Quarter 2 Workforce Analysis – Demographic Summary that outlines the number of veteran employees at the agency as of Q1 2023, it was determined that the WDVA is above the state average. Veterans make up 11.62% of the WDVA's total workforce (including disabled and non-disabled), which is above the state average of 7.97%.



2. Upon reviewing the 2023 Statewide Job Group Underutilization Report, it was determined that WDVA no longer has any Job Groups that are underutilized for minorities aside from those that are underutilized statewide. Several categories in the report, including Health Care Professionals, are no longer underutilized for women. The department overall is doing well with our metrics.



- a. In 2020, WDVA was underutilizing minorities in the public safety positions, that has been correct in the 2023 reporting period.
- b. In 2020, WDVA was underutilizing minorities in food production roles, this has become a statewide issue.
- c. The statewide underutilization of women and minorities in the 2023 report is what WDVA will be focusing on. The below table lists the number of positions we have in the group code numbers that are underutilized.

Job Group Name	# of positions at WDVA	% of Women	
Admin Support	43	90.70%	7.00%
Admin Support - Fiscal	*	*	*
Administrators-Senior Exec	14	50.00%	0.00%
Business Professionals	*	*	*
Business Supervisors	*	*	*
Claims Determination	13	53.80%	7.70%
Craft and Trade	*	*	*
Education and Training	*	*	*
Financial Supervisors	*	*	*
Fiscal	22	59.10%	0.00%
Food Production	32	81.30%	15.60%

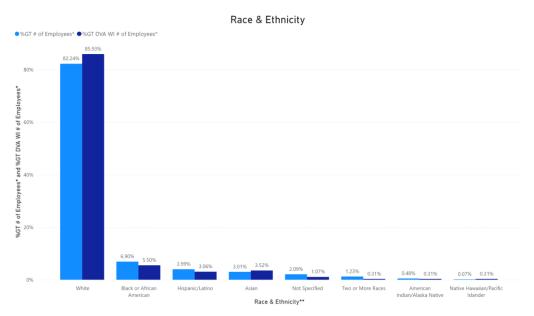
Health Care Professionals	73	93.20%	11.00%
Health Care Technicians	203	89.70%	19.70%
Health Social Services Supv	30	86.70%	10.00%
IS Professionals	14	28.60%	14.30%
Legal Professionals	*	*	*
Mech Equip-Maintenance Rep	12	0.00%	8.30%
Mechanical and Maintenance Supv	13	23.10%	7.70%
Mid-Level Supervisors	*	*	*
Personal Care	*	*	*
Physicians and Health Care Pract	*	*	*
Policy Planning and Research	*	*	*
Power Plant	*	*	*
Production Laborers	65	61.50%	9.20%
Program Specialist	*	*	*
Public Relation and Media Tech	*	*	*
Public Safety	*	*	*
Science Professionals	*	*	*
Serv Qual Control and Comply Sup	*	*	*
Social Services Professionals	26	73.10%	15.40%
Unclassified	*	*	*
* Your filter selection(s) resulted in fewer than 10 employee records. The data have been suppressed in accordance with DPM's data governance policies. Please change your filter selections to view summary			
data.*	80	38.8	3.8

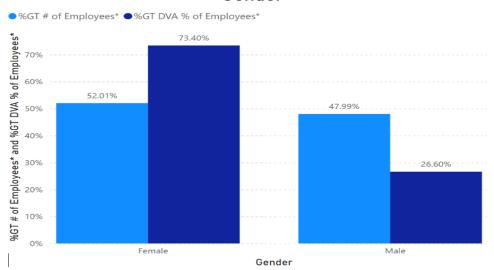
- d. For this plan, WDVA will be focusing on increasing representation in the following fields. Due to limited positions in the department in certain group codes, this plan will not address those positions.
 - i. Women only: Maintenance repair
 - ii. Minorities only: Administrative Support, Administrators Senior Executives, Claims Determination, and Fiscal
- 3. Most of the WDVA workforce is employed through our Veterans Home in King, WI. The WDVA has identified that King has the least number of diverse employees, something we attribute as a challenge from the rural location. From the latest census data, 95.6% of Waupaca County is white, presenting a challenge in recruiting a diverse racial candidate base. Below is a chart showing the racial and ethnic breakdown of Waupaca County. The three counties on the east and west of Waupaca County (Portage, Outagamie, and Winnebago) are listed in the table to show their ethnic breakdown and to show that this is where WDVA needs to focus their recruiting efforts.

	Waupaca population	Portage Population	Outagamie Population	Winnebago Population
American Indian/Alaska Native	0.2%	0.5%	1.9%	0.8%
Asian	0.3%	3.3%	3.9%	3.4%
Black or African American	1.4%	1.1%	1.8%	2.8%
Hispanic/Latino	2.4%	3.9%	5%	4.7%
Native Hawaiian/Pacific Islander	0.0%	0.1%	0.1%	0.1%
White	95.6%	93.5%	90.2%	90.8%
Two or More Races	2.0%	1.6%	2%	2.1%
Not Specified	N/A	N/A	N/A	N/A

We have identified this as an issue and strive to increase the qualified diverse candidates we attract and retain through efforts discussed throughout this plan. WDVA will strive to match the composition of the area but will work to recruit out of Waupaca County to try to meet the statewide demographics, the workplace demographics will not reflect the members at King but rather the surrounding areas.

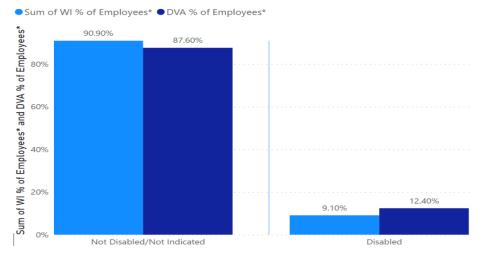
 Upon reviewing the workforce analysis-demographic metrics provided as of August 7, 2023, the comparison of the grand total of state of Wisconsin Employees vs. the grant total number of WDVA employees are as follows:



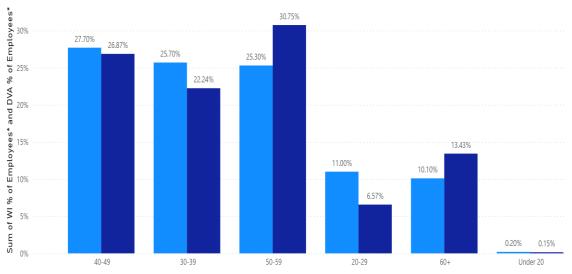


Gender

Disability Status

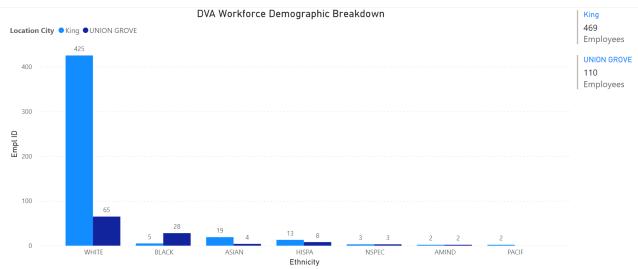




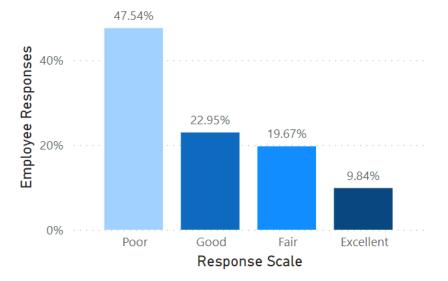


● Sum of WI % of Employees* ● DVA % of Employees*

5. The majority of WDVA employees are the Veterans Homes, it is crucial that we look at the data from the homes separately to see how we can strive to have more diversity, equity, and inclusion.



- 6. WDVA reviewed the exit surveys completed from 2022 Q1 through 2023 Q3, and 64 exit surveys were completed. In this time frame, WDVA termed or retired 248 people, so only 25.8% of exiting staff participated in this survey, and this does not give us a statistically significant sample but some data can be used. Of those 64, 25 were from the Division of Homes
 - a. The Veterans Homes had the highest turnover.
 - b. More than half of the people surveyed are over the age of 30.
 - c. Only 5 of the 64 employees that took the exit were of minority status.
 - d. There were 27 resignations and 14 retirements.
 - e. WDVA lost the largest number of staff that were between 5 and 9 years of service with the state and number of years with the department.
 - f. Over 62% of surveyors said that the communication within the agency as a whole was poor to fair and 39% rate their job satisfaction as poor to fair.
 - g. One of the biggest issues facing the department from an employee's standpoint is a lack of potential growth within the department. For the Division of Veterans Homes the rating of poor jumps from 47.54% to 56.52%.



How would you rate the growth potential?

- h. Of the Veterans Homes employees that took exit surveys, 43.48% stated that their workload was excessive.
- For the overall department, we saw the top three reasons for leaving the department as work/life balance, lack of career advancement, and compensation. For the Division of Veterans Homes, the top reason after retirement was working conditions.
- j. The largest takeaway from this data is that WDVA needs to focus on getting employees to complete this survey. This is addressed in the retention portion of the plan.
- 7. WDVA lost a good number of staff due to transfers or termination. Our King campus lost 39 employees to transfers and 70 to termination. Then they were only able to hire 76 new employees for Q1 through Q3 of 2023, King has 33 positions that need to be filled. This does not include retirements. There is a similar trend at Union Grove, where there are a total of 30 transfers and terminations but only 17 new hires.

Overall, the department lost 185 employees since Q1 of 2023 due to transfers, retirement, or termination and only hired 123 new hires; therefore, the department has only filled positions at a rate of 66%, and this poses the question of retention of staff.

Terms and Definitions

Adverse impact refers to employment practices that appear neutral but have a discriminatory effect on a protected group. Adverse impact may occur in hiring, promotion, training and development, transfer, layoff, and even performance appraisals.

Climate survey is a key tool used to measure employee engagement and perceptions of the working environment in general.

Coffee talks is a monthly meeting that allows supervisors to learn, train, and collaborate with each other.

Discrimination is the unlawful actions or practices which constitute unequal or different treatment of, or create an unequal or different effect on an individual or group of people, on the

basis of age, race, creed or religion, color, handicap, sex, marital status, national origin or ancestry, political affiliation, arrest, or conviction record, sexual orientation, or other bases as specified in federal and state statutes. Disparate treatment of employees is based on factors not related to qualifications, skills, or performance.

Diversity is the varied identities and characteristics that distinguish individuals or groups. It includes race, ethnicity, gender, age, national origin, religion, disability, sexual orientation, socioeconomic status, education, marital status, and language. It also encompasses a wide range of attributes that we bring to the workplace including our values, beliefs, experiences, backgrounds, and behaviors that frame how we see the world and engage with others.

Equity is the fair treatment, access, opportunity, and advancement for all. Equity also refers to fair and just practices, policies, and systems, based on a recognition of individual and group differences and barriers that disproportionately impact underserved and underrepresented individuals.

Harassment is the unwelcome verbal, physical, or visual conduct that is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

Inclusion is the active and intentional cultivation of an environment in which everyone feels welcomed, respected, supported, valued, and empowered to fully engage.

Key Performance Indicators (KPI) are a measurable value that demonstrates how effectively a company is achieving key business objectives. Organizations use KPIs at multiple levels to evaluate their success at reaching targets. High-level KPIs may focus on the overall performance of the business, while low-level KPIs may focus on processes in departments such as sales, marketing, HR, support, and others.

Racial equity is the condition what would be achieved if race is not used as a factor to predict life outcomes and outcomes for all groups are improved through the elimination of policies, practices, attitudes, and cultural messages that reinforce differential outcomes by race.

Unconscious Bias means unconscious attitudes and stereotypes toward individual and social groups that affect our understanding, actions, and decisions.

Equity and Inclusion Strategic Plan Wisconsin Department of Veterans Affairs Goals and Strategies

WDVA is committed to ensuring that all applicants and employees have the opportunity to thrive in all aspects of well-being, regardless of their race, gender, sexual orientation, age, religion, conviction status, or political status. WDVA will continue to identify broad goals from its workforce analysis to address barriers to advancing equity and inclusion in each equity and inclusion focus area (Recruitment, Retention, and Agency Culture). Once those goals are identified, the agency planning, and development team will identify strategies to address the barriers. Each strategy chosen is included in the agency El workplan.

Overarching Goals	Strategies to Achieve Goals
Recruitment Goals	 Assess policies and procedures for potential bias in selection and remove barriers to diversity, equity, and inclusion.
To achieve recruitment and hiring levels of diversity representing the communities we work within, WDVA will improve recruiting practices to	 Promote equal opportunity in selection by reviewing current practices and processes through an equity and inclusion lens. Forecast workforce needs, set strategic diversity hiring goals, and measure progress.
attract a more diverse candidate pool. This will be more closely align to statewide diversity and inclusion goals.	 Set standards for hiring authorities incorporating an equity framework that clearly articulates equity and helps address implicit and explicit bias.
	 Review selection processes and analyze adverse impacts. Those which show the potential for adverse impact will be modified or replaced.
	• Expand the reach of recruitment efforts by partnering with campuses and local organizations in targeted communities to engage the underutilized populations and promote WDVA as a potential employer to organizations that provide employment services to minorities, women, veterans, and disabled applicants.
	 Explore possible employment incentives for relocation or travel to the Veterans Homes in Union Grove or King.
	 Have subject matter experts available at job fairs to discuss employment and applying for positions at WDVA.
	Expand and improve community recruitment efforts to nursing school programs to attract new graduates in more demographically diverse areas.

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Retention Goals The agency will reevaluate specific aspects of the employee experience, beginning with orientation and providing a supportive environment that encourages diversity, equity, and inclusion. This will be done while actively reviewing the disparity of promotions in marginalized populations and promote leadership opportunities to retain and reduce turnover for underutilized job classifications to maintain a diverse population.	 Establish consistent onboarding processes, including HR new employee orientation and specialized orientation for employee work areas. Develop new pathways for employee upward mobility and department connection. Increase available training to all employees. Develop a biannual employee engagement survey for all employees. To assist employees, utilize information from these interviews to show and evaluate the department's morale and employment practices. Create an exit interview to be administered during the employee's final two weeks. Information from these interviews will be used to help implement changes to increase retention, gain a better understanding of the culture at WDVA to determine why staff are leaving, and identify if any workplace factors contributed to the turnover. Establish new supervisor requirements, including training programs, mentorship, cultural competency training, and professional development. Full review of all department policies, eliminating outdated policies and updating current policies if needed.
Agency Culture and Diversity Goals Promote an agency culture that is respectful; understands implicit and explicit bias; values diversity, promotes equity; and actively engages in inclusion.	 Develop relationships with diverse communities as a matter of standard practice. Empower our EIAC to act as an advocate and a resource for equity and inclusion in the agency. Establish a process for staff to access neutral conflict resolution support regarding issues that emerge around race, culture, ethnicity, gender, or other diversity-related issues; and act to support enhancement to agency respectful workplace policies. Foster a culture of open communication and transparency, and promote forums for discussion of diversity, equity, and inclusion through trainings and tools.

Equity and Inclusion Strategic Plan – Workplan

The agency workplan represents the strategies and actions for the agency El Plan. Each strategy identified to meet agency equity and inclusion goals is listed, and the actions to achieve that strategy are described. As there is some overlap between each target area, there will be items in Recruitment, Retention, or Culture that will have elements that might improve or reflect other areas. Each action implemented is part of the process of achieving specific strategic outcomes. The comprehensive selection of activities to support the strategy may be short-term or long-term actions. KPIs gauge the progress of the actions taken to reach the desired outcome. KPIs provide clarity to the process for reaching short-term and long-term goals and allow teams to focus on efforts that fall short and require attention immediately to stay on track. KPIs support the monitoring and continuous improvement activities of the strategic plan.

Recruitment Strategies	Actions	KPI	Outcome/Metric	Responsible staff/office	Targeted Completion Date
Assess policies and procedures for potential bias in selection and remove barriers to diversity, equity, and inclusion.	 Gather all relevant policies Review all policies through the lens of E&I 	 Number of policies reviewed by team 	 Policies will be reviewed and updated, if necessary Increase diversity among applicants 	 Equity and Inclusion Committee Office of the Secretary HR 	 By January 2024, begin gathering data with check-ins to occur on a quarterly basis. Complete a review of all policies by January 2026.
Promote equal opportunity in selection by reviewing current practices and processes through an equity and inclusion lens.	 Gather information about current practices and processes Review all practices and processes through the lens of E&I 	 Number of practices and processes reviewed by team 	 Practices will be reviewed and updated, if necessary Increase diversity among applicants 	 Equity and Inclusion Committee Office of the Secretary HR 	 By January 2024, begin gathering data with check-ins to occur on a quarterly basis. Complete a review of all practices and policies by January 2026.
Forecast workforce needs, set strategic diversity hiring goals, and measure progress.	 Gather information about current practices Determine and monitor hiring goals 	 Numbers of new diversity related reports created and monitored 	Improved tracking of E&I metrics	 Equity and Inclusion Committee HR 	 By January 2024, begin gathering data with check-ins to occur on a quarterly basis. Metrics will be provided to other E&I teams to help steer decision-making.

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Set standards for hiring authorities incorporating an equity framework that clearly articulates equity and helps address implicit and explicit bias.	 Establish new and enhance existing materials related to hiring standards Provide training to hiring authorities in identifying implicit and explicit bias 	 Number of new materials created Number of existing materials updated 	 Reduce the impacts of implicit and explicit bias in hiring decisions 	Equity and Inclusion CommitteeHR	 By January 2024, begin gathering data with check-ins to occur on a quarterly basis. By January 2025, publish updated materials
Review selection processes and analyze adverse impacts. Those which show the potential for adverse impact will be modified or replaced.	 Gather information about current practices and analyze focused on what might be causing adverse impacts. Remove or modify any existing processes that could potentially cause adverse impact 	Number of processes changed	 Selection processes will be updated to reduce adverse impacts 	 Equity and Inclusion Committee HR 	 By January 2024, begin gathering data with check-ins to occur on a quarterly basis.
Expand the reach of recruitment efforts by partnering with campuses and local organizations in targeted communities to engage the underutilized populations and promote WDVA as a potential employer to organizations that provide employment services to minorities, women, veterans, and disabled applicants.	 Gather information about current practices related to recruitment efforts at college campuses and relevant local organizations in targeted underutilized communities. Increase agency participation in recruiting at college campuses and provide materials on employment at WDVA to organizations serving underutilized individuals. 	 Number of relevant college events attended Number of organization partners communicated with regarding employment matters 	Increase diversity among applicants	 Equity and Inclusion Committee HR 	 By January 2024, begin gathering data with check-ins to occur on a quarterly basis. By January 2025, have materials for local organizations and universities related to WDVA employment updated and delivered to relevant partners
Explore possible employment incentives for relocation or travel to the Veterans Homes in Union Grove or King.	 Gather information about current practices Determine if additional funding can be provided to help attract candidates 	Number of employment incentives provided to assist staff in relocating to our Homes	 Increase diversity among new hires Reduce the number of candidates who reject job offers 	 Equity and Inclusion Committee Finance and Budget HR 	 By January 2024, begin gathering data with check-ins to occur on a quarterly basis.

Have subject matter experts available at job fairs to discuss employment and applying for positions at WDVA.	 Gather information about current practices Increase agency presence at relevant job fairs 	 Number of job fairs attended by agency representatives 	 Increase diversity among applicants 	 Equity and Inclusion Committee Assorted Agency Subject Matter Experts HR 	 By January 2024, begin gathering data with check-ins to occur on a quarterly basis.
Expand and improve community recruitment efforts to nursing school programs to attract new graduates in more demographically diverse areas.	 Gather information about current practices Increase outreach efforts to nursing schools 	 Number of nursing school programs in diverse areas contacted 	 Increase diversity among applicants 	 Equity and Inclusion Committee HR 	 By January 2024, begin gathering data with check-ins to occur on a quarterly basis.

messaging.	Associated Recruitment Staff Training	 Train all supervisors and managers on using an equity tool in developing and reviewing policy and procedure. Provide training to subject matter experts who attend career fairs to provide consistent messaging.
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Retention Strategies	Actions	KPI	Outcome/Metric	Responsible staff/office	Targeted Completion Date
Establish consistent onboarding processes, including HR new employee orientation and specialized orientation for employee work areas.	 Examine the current onboarding processes for all locations Revamp or design new onboarding materials. Create a department standard covering the overall department to be used at all locations. Work with supervisors to develop specialized onboarding processes. 	 Overall consistency and messaging to staff. Increase the awareness of the entire department to new employees. Increase overall position competencies. 	 A greater sense of the larger mission of WDVA Connectivity to the department Less turnover Better assistance for the populations we serve to due consistent staffing. 	 OOS EIAC HR Administrators Bureau Directors Supervisors 	 Beginning of January 2024 for evaluation of current practices April 2024 developing new plans and tools October 2024 roll out of all new onboarding.
Develop new pathways for employee upward mobility and department connection.	 Create a volunteer mentorship program that matches employees with mentors at various levels of their desired career path. Create employee affinity groups that are employee- run to encourage workplace relationships and a safe space for employees to discuss issues they face. Groups can include but are not limited to ethnicity, race, veteran, LGBTQIA+, parents, professional development, and supervisors. 	 Number of employees seeking advancement in the department Number of employees provided to work through issues with people going to similar issues. 	 To have a full designed mentorship program that can be promoted during recruitment Sharing of successes for staff working with a mentor. Increase in professional development Increase in morale with employees 	• EIAC • HR	 January 2024 begin the research into developing a mentorship program June 2024 have a proposed program to OOS October 2024, roll out of program January 2024 research into affinity groups at other departments and private companies April 2024 proposal of groups to OOS. July 2024 request for employees to participate and run affinity groups.
Increase available training to all employees.	 Investigate paying for recertifications and CEUs for medical and technical staff when it is required for their position. Investigate paying for licensing for current staff if needed (i.e., CDL drivers) 	 Number of employees having to pay out-of-pocket for their recertifications and CEU. 	 100% of staff have their job- required recertifications and CEUs paid for 	Human Resources/ Program Areas/ Budget and Finance	By January 2024, assess the financial viability of funding these programs. If possible, begin implementing them with quarterly meetings.

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	 rather than trying to recruit for these positions. Investigate paying for licensing for current staff if needed (i.e., CDL drivers) rather than trying to recruit for these positions. Expand supervisory budgets for staff training and professional development. 	 Number of recruitments that happen internally Amount of training attended per work area 	 Increase in internal recruitment Staff will attend more trainings 		
Develop a biannual employee engagement survey for all employees. To assist employees, utilize information from interviews to show and evaluate the department's morale and employment practices.	Create a truly anonymous survey with no email login or tracking. The only identifying option on the survey will be the user's work office (King, Madison, Union Grove, Etc.).	Number of submissions gained	Survey response rate at least on par with previous agency surveys	Office of the Secretary/ Bureau of Information Systems	OOS to report on the survey and action steps due to the results.
Create an exit interview to be administered during the employee's final two weeks. Information from these interviews will be used to help implement changes to increase retention, gain a better understanding of the culture at WDVA to determine why staff are leaving, and identify if any workplace factors contributed to the turnover.	 More consistency with exit interviews A meeting with HR should be scheduled once a resignation has been submitted. 	 Number of exit interviews completed Number of HR meetings held 	 Increase in the number of completed exit interviews. HR meets with all available resigning staff 	Human Resources/ Office of the Secretary	 When reporting on the employee engagement survey, OOS will report to staff about findings from exit interviews and steps taken to improve the workplace and retention. By January 2024, begin collecting improved information from exit interviews. By January 2025, begin building action plans to address areas of needed growth identified in exit interviews.

Establish new supervisor requirements, including training programs, mentorship, cultural competency training, and professional development.	 Develop a supervisor training program with job aids, performance review information, hiring, etc. Supervisor mentorship program, similar to the employee mentorship program Increase options for closed- door training, traveling training in a more engaging environment. Quarterly training for employees to be conducted by supervisors about diversity, equity, and inclusion. Reinstate the monthly supervisor "Coffee Talks" training. 	 Number of supervisors trained. Number of supervisors getting mentored Number of supervisors attending closed- door/external trainings Number of employees attending training Number of supervisors attending "Coffee Talks" 	 100% of supervisors will complete the training. Increase in supervisors receiving mentorship Increase in supervisors attending trainings. Increase in employees attending training Increase in supervisors attending training Increase in supervisors attending "Coffee Talks" 	Human Resources/ Supervisors/ Office of the Secretary	 By January 2024, begin planning the supervisory training program. By January 2024, begin planning the mentorship in conjunction with the employee program with check-ins to occur on a quarterly basis. By January 2024, begin tracking supervisors attending training, employees attending diversity training, and supervisors attending Coffee Talks.
Full review of all department policies and elimination of outdated policies and updating current policies if needed.	Review all existing department policies to clarify work rules with a mind toward diversity, equity, and inclusion.	Number of active policies	Number of policies retired	Office of the Secretary/ Program Areas	Conduct a policy review by June 2024

Associated Retention Staff	Increase available training to all employees.
Training	Establish new supervisor requirements, including training programs, mentorship,
	cultural competency training, and professional development.

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El Culture Strategies	Actions	KPI	Outcome/Metric	Responsible staff/office	Targeted Completion Date
Develop relationships with diverse communities as a matter of standard practice.	 Gather relevant information on the diverse communities that the agency has formed partnerships with Increase the number of partnerships we have 	Number of diverse community partners	 Improved diversity awareness among WDVA staff 	 Equity and Inclusion Committee Office of the Secretary HR 	 By January 2024, begin gathering data with check-ins to occur on a quarterly basis.
Empower our Equity and Inclusion Committee to act as an advocate and a resource for equity and inclusion in the agency.	 Provide the EIAC with methods of outreach and communication with staff Enhance existing services to better promote equity and inclusion 	 Number of employees contacted regarding equity and inclusion matters 	 Improved employee satisfaction Enhanced prominence of E&I Committee 	 Equity and Inclusion Committee Bureau of Information Systems HR 	 By January 2024, begin gathering data with check-ins to occur on a quarterly basis.
Establish a process for staff to access neutral conflict resolution support regarding issues that emerge around race, culture, ethnicity, gender, or other diversity-related issues; and act to support enhancement to agency respectful workplace policies.	 Gather relevant information on legal issues surrounding conflict resolution Form a partnership or innovate an internal solution to provide conflict resolution assistance 	Number of conflicts resolved	 Improved conflict resolution Identification of problem areas for future improvements 	 Equity and Inclusion Committee Office of the Secretary Legal HR 	 By January 2024, begin gathering data with check-ins to occur on a quarterly basis.

Foster a culture of open communication and transparency, and promote forums for discussion of diversity, equity, and inclusion through training and tools.	 Create skits with scenarios on unbiased behavior that take place in the workplace as a demonstration with a mind toward diversity, equity, and inclusion. Create calendars to showcase the different ethnic holidays and activities in the WDVA community Hold quarterly group recognition days for personal connection among upper management, HR, supervisors, and employees. Provide safe spaces for persons with disabilities. Cultivate a method to be shared with all supervisors to assist them in defusing different unintended biases and observe differences within their work unit. 	 Employee attendance/viewership of the skits Calendars created and shared Employee attendance at group recognition days Supervisory materials available 	 Increase in the number of employees attending skits and other meetings Increase in employee attendance at events Increase in employees choosing to come in for employee appreciation events Relevant documents created or reviewed for updates 	 Equity and Inclusion Committee Office of the Secretary Human Resources Affinity Groups 	 By January 2024, begin preparing skits and calendars for the upcoming year. Hold meetings to review and update as needed. By January 2024, have a plan in place for quarterly group recognition days. By January 2024, have documents identified for review or creation for supervisors
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Associated Culture Staff Training	DOA Respectful Workplace Training
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Internal Methods of Communication of Equity and Inclusion Plan

- A memorandum detailing the location of the Equity and Inclusion Plan and the responsibility to read, understand, support, and implement equal opportunity and affirmative action will be sent from the agency's leadership or alternatively, the Equity and Inclusion Officer, to all staff on an annual basis.
- The agency's Equity and Inclusion Plan is available to all employees on the agency's internal website at WDVA or the Human Resources Intranet Site or in a print copy to anyone who requests it. Upon request, the agency will make the plan available in alternative formats.
- A physical copy of the Agency's Equity and Inclusion Plan will be available to employees at the following addresses:

2135 Rimrock Road, Madison, WI 53713
5400 West National Avenue, Milwaukee, WI 53214
N2665 County Road QQ, King, WI 54946
2145G Spring Street, Union Grove, WI 53182
30 East Mifflin Street, Madison WI 53713

- Internal communication will be regular basis with the Secretary's office and the Equity & Inclusion Advisory Committee providing the data information as it relates to recruitment, retention, and culture. Further discussion will be held to discuss improvements or adjustments to the plan.
 - Information will be provided in the monthly employee newsletter.
 - OOS and EIAC will host quarterly employee education days that will allow staff from other sites to attend virtually. These days will include training and presentations from all subcommittees.
- Nondiscrimination and equal opportunity statements and posters are prominently displayed and available in areas frequented and accessible to employees.
- All employees will be provided the Equity and Inclusion email address to send any feedback. This mailbox will be monitored by the Chair, Co-Chair, and Secretary of the committee. These representatives will pass this information to the Deputy Secretary and will honor any requests for anonymity.

External Methods of Communication of Equity and Inclusion Plan

- The agency's Equity and Inclusion Plan is available on the agency's public website at wisvets.com or in a print copy to anyone who requests it. Upon request, the agency will make the plan available in alternative formats. All external communication will be run through the Office of Public Affairs and the Office of the Secretary.
- The agency's website homepage, letterhead, publications, and all job postings, will include the statement "an equal opportunity employer" and "women, minorities, and individuals with disabilities are encouraged to apply." The agency will also ensure a representative ratio of diversity is on all diversity marketing materials.
- Nondiscrimination and equal opportunity statements and posters are prominently displayed and available in areas frequented by and accessible to members of the public. Examples of posters displayed include: Equal Employment Opportunity is the Law, Employee Rights Under the Fair Labor Standards Act, and the Americans with Disabilities Act Notice to the Public.
- A physical copy of the Equity and Inclusion Plan will be available to contractors, vendors, and members of the public at the following addresses:

2135 Rimrock Road, Madison, WI 53703 5400 West National Avenue, Milwaukee, WI 53214 N2665 County Road QQ, King, WI 54946 2145G Spring Street, Union Grove, WI 53182 30 West Mifflin Street, Madison, WI 53713

• The Office of Public Affairs will publish the email address for the EIAC on the website to receive any feedback from the public. As with the internal communication plan, this will be monitored by the executive team of the committee and will be addressed by the Deputy Secretary.

Implementation Plan

The Equity and Inclusion Plan is a guiding document that will help frame and direct the equity and inclusion work of WDVA, preceded by a vision for its implementation and integration, as well as the accountability measures, tracking, and reporting that will bring these goals to light. The all-encompassing strategies and actions reflect the insight and innovation produced by the subject matter experts listed above. The Equal Opportunity Program Specialist, EIOP, and the Human Resources Director will regularly monitor the metrics contained in this Plan.

Internal Monitoring of Equity and Inclusion Plan

The WDVA EIPO, in conjunction with the Equal Opportunity Program Specialist, Human Resources Director, and the Secretary's Office, will develop an Equity and Inclusion Plan to monitor the actions specified above.

At least annually, the EIPO and Human Resources Director will separately meet with the Secretary's Office and each Division Administrator to review the progress and challenges relating to the agency's Equity and Inclusion Plan, and to garner feedback for consideration of changes to the Plan. More frequent meetings may be scheduled as necessary to keep the action plans within the Equity and Inclusion Plan moving forward.

In addition, action plan activities will be incorporated into the quarterly work plans for the WDVA's Equity and Inclusion Committee. Work plan activities will be reported annually to the Deputy Secretary.

Implementation team meeting schedule

The WDVA Equity and Inclusion Committee will meet quarterly, with subcommittees and affinity groups meeting on an as-needed basis.

Responsible Parties

WDVA Equity and Inclusion Committee WDVA Secretary's Office Region 4 Human Resources Director & Staff

Job		Availal	bility %	Unde	rutilization
Group #	Job Group Name	Women	Minorities	Women	Minor ities
001	Administrators – Senior Executives	46.6	11.5	DNR	DOC
002	Mid-Level Supervisors	55.1	10.5	DNR	DNR
003	Business and Program Area Supervisors	60.3	12.6	No	No
004	Financial Supervisors	51.7	11.8	No	No
005	Architect/Engineer Supervisor	21.9	8.6	No	No
006	Physical, Natural and Social Sci Supervisors	47.6	11.5	Yes	Yes
007	Health and Social Services Supervisors	51.8	11.8	DMA	No
008	Education Supervisors	47.6	11.5	No	No
009	Protective Services Supervisors	51.3	10.3	Yes	No
010	Service, Qual Control and Compliance Sup	48.0	12.3	No	No
011	Mechanical and Maintenance Supervisors	35.0	15.9	Yes	Yes
016	Fiscal	55.2	10.2	PSC	No
019	Program Specialist	56.4	12.9	No	No
020	Business Professionals	50.6	11.5	No	No
025	Inspectors, Investigators, and Compliance	46.0	10.8	DOT	DATCP
028	Architects and Engineers	26.9	9.4	Yes	DOA
043	IS Professionals	52.1	11.3	Yes	No
044	Planning Policy and Research	48.4	11.6	WHS	No
049	Science Professionals	47.8	11.2	No	No
050	Environmental Specialists	45.7	11.5	Yes	Yes
057	Physicians and Health Care Practitioners	59.8	8.2	Yes	No
063	Health Care Professionals	51.9	10.8	No	No
106	Education and Training	64.4	11.2	Yes	No
112	Social Service Professionals	54.3	14.5	DATCP	DOC
119	Legal Professionals and Paralegal	48.1	8.0	No	No
127	Public Relations and Media Technicians	50.6	11.6	DOA/ECB	No
134	Health Care Technicians	76.7	14.2	Yes	No
147	Natural Science and Laboratory Techs	34.7	12.8	Yes	Yes
159	Property Management	47.6	11.5	No	No
185	IS Support, Program and Service Techs	73.1	14.0	Yes	No
195	Administrative Support	17.3	14.7	CANB	DOC/DNR
202	Administrative Support-Fiscal	76.8	13.3	No	Yes
226	Claims Determination	47.6	11.5	No	No
247	Public Safety	52.3	10.0	Yes	DNR
253	Food Production	37.5	18.1	No	Yes
262	Personal Care	85.2	15.1	Yes	No
301	Mechanical Equipment, Maint. Repair	30.1	21.3	Yes	Yes
333	Craft and Trade	3.3	8.4	No	No
400	Power Plant	4.3	9.9	Yes	No
999	Production Laborers	44.5	25.2	DOA	Yes

Table 1: 2023 Statewide Underutilization Analysis Table with Availability PercentagesEffective: July 1, 2023 through June 30, 2026

Job	2020		20	023
Group	Underut	ilization	Underu	tilization
#	Women	Minorities	Women	Minorities
001	DOC	Yes	DNR	DOC
002	DOC	No	DNR	DNR
003	No	DOR, DNR	No	No
004	No	No	No	No
005	No	No	No	No
006	Yes	Yes	Yes	Yes
007	DMA	No	DMA	No
008	No	No	No	No
009	Yes	Yes	Yes	No
010	No	No	No	No
011	No	No	Yes	Yes
016	DOR, DFI	No	PSC	No
019	No	No	No	No
020	DOC, DMA, DWD	DMA	No	No
025	Yes	DATCP	DOT	DATCP
028	No	No	Yes	DOA
043	Yes	No	Yes	No
044	No	DMA	WHS	No
049	No	Yes	No	No
050	No	Yes	Yes	Yes
057	Yes	No	Yes	No
063	Yes	No	No	No
106	Yes	Yes	Yes	No
112	DMA	BOALTC, DOC, DMA	DATCP	DOC
119	OSPD	No	No	No
127	DOT	Yes	DOA, ECB	No
134	Yes	DOC	Yes	No
147	Yes	Yes	Yes	Yes
159	No	No	No	No
185	Yes	No	Yes	No
195	Yes	WHS, DNR	CANB	DOC, DNR
202	DCF, DOR	Yes	No	Yes
226	No	No	No	No
247	Yes	DMA, DNR, DVA	Yes	DNR
253	No	DVA	No	Yes
262	Yes	No	Yes	No
301	No	Yes	Yes	Yes
333	No	No	No	No
400	Yes	No	Yes	No
999	No	DMA, DNR, DVA	DOA	Yes

Table 2: Statewide Underutilization Comparison of 2020 and 2023