

## EEO PLANNING and BARRIER ANALYSIS

- 1. REASON FOR ISSUE:** This Handbook provides guidance on the Department of Veterans Affairs (Department or VA) procedures on creating a Model Equal Employment Opportunity (EEO), Diversity, and Inclusion Program in compliance with all applicable laws, regulations, and directives.
- 2. SUMMARY OF CONTENTS/MAJOR CHANGES:** This Handbook describes and establishes guidance on mandatory procedures for VA and its subcomponents to complete the Equal Employment Opportunity Commission (EEOC) Management Directive 715 (MD-715) EEO Plan and Program Status Report and conduct barrier analysis annually.
- 3. RESPONSIBLE OFFICE:** Office of Diversity and Inclusion (06), Office of Human Resources and Administration.
- 4. RELATED DIRECTIVE:** VA Directive 5975, Diversity and Inclusion
- 5. RESCISSIONS:** None

**CERTIFIED BY:**

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**BY DIRECTION OF THE SECRETARY  
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**BARRIER ANALYSIS**

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## BARRIER ANALYSIS

**1. PURPOSE.** This Handbook describes and establishes guidance for the Department of Veterans Affairs (VA) and its subcomponents to complete the Equal Employment Opportunity Commission (EEOC) Management Directive 715 (MD-715) EEO Plan and Program Status Report and conduct barrier analysis annually.

### 2. BACKGROUND

a. In 2003, the EEOC issued MD-715. It is a blueprint/roadmap for establishing and maintaining effective EEO Programs under Section 717 of Title VII of the Civil Rights Act, as amended and effective affirmative action programs under Section 501 of the Rehabilitation Act.

b. EEOC introduced six essential elements that it uses to measure the effectiveness of an agency's EEO Program. They are:

(1) **Demonstrated Commitment from Agency Leadership.** Requires Agency Leadership to issue written policy statements expressing commitment to EEO and a workplace free from discriminatory harassment.

(2) **Integration of EEO into the Agency's Strategic Mission.** Requires an Agency's EEO Program to be organized and structured to maintain a workplace that is free from discrimination in any of the Agency's policies, procedures, or practices, and support the Agency's strategic mission.

(3) **Management and Program Accountability.** Requires Agency Leadership to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the Agency's EEO Program.

(4) **Proactive Prevention of Unlawful Discrimination.** Requires Agency Leadership to make early efforts to prevent discriminatory actions and eliminate barriers to EEO in the workplace.

(5) **Efficiency.** Requires Agency Leadership to ensure effective systems are in place for evaluating the impact and effectiveness of the agency's EEO Programs as well as an efficient and fair dispute resolution process.

(6) **Responsiveness and Legal Compliance.** Requires an Agency to be in full compliance with EEO statutes and EEOC regulations, policy guidance, and other written instructions.

c. VA's obligation includes evaluating its workforce to uncover, examine, and remove barriers to EEO on a continuous basis and reporting to the EEOC annually. Creating a

barrier-free environment where all applicants and employees have the opportunity to compete and work to their fullest potential is vital for VA to become a model employer.

### **3. ROLES AND RESPONSIBILITIES**

#### **a. Secretary of Veterans Affairs**

(1) The Secretary will advocate, ensure accountability, and monitor the Department's overall progress towards establishing and maintaining a Model EEO Program.

(2) The Secretary will also provide adequate resources to ensure an effective organizational culture change and a sustainable workforce diversity and affirmative employment program to promote equal opportunity in accordance with applicable laws and regulations.

#### **b. Assistant Secretary for Human Resources and Administration**

(1) The Assistant Secretary for Human Resources and Administration (HR&A) will provide resources and support to ensure VA policies and programs are free from discriminating factors.

(2) The Assistant Secretary for HR&A will also communicate EEO policies, plans, programs, and initiatives to all VA officials and employees, provide VA-wide oversight, and enforce VA-wide compliance and accountability.

(3) The Assistant Secretary for HR&A will ensure that a HR&A representative is present at the quarterly MD-715 meetings held by the Office of Diversity and Inclusion (ODI).

**c. General Counsel.** The Office of General Counsel, and Regional Counsels as appropriate, will provide legal advice and guidance on plans made to eliminate identified barriers.

#### **d. Deputy Assistant Secretary for Diversity and Inclusion**

(1) The Deputy Assistant Secretary (DAS) for the Office of Diversity and Inclusion (ODI) will oversee compliance with and provide strategic direction for EEO policies and programs VA-wide, with the exception of EEO complaint processing policy and programs.

(2) The DAS for ODI will prepare and publish the VA-wide MD-715 EEO Plan and Program Status Report annually on its Web site.

(3) The DAS for ODI will serve as an advisor to VA leadership and career development programs to eradicate barriers to EEO in the outreach and selection processes and infuse EEO content into program curricula.

**e. Deputy Assistant Secretary for Human Resources Management**

(1) The DAS for the Office of Human Resources Management (OHRM) will collaborate and cooperate with ODI to ensure periodic schedules are established to review Merit Promotion Policy and Procedures, Employee Recognition Awards Program and Procedures, and Employee Development/Training Programs for systemic barriers that may be impeding full participation in promotion, employee recognition, and training opportunities by all groups. The ODI Workforce Analysis team will work with OHRM to conduct disparate impact analysis on policies or directives on an as needed basis.

(2) The DAS or designated representative for OHRM will participate in the quarterly MD-715 meetings.

(3) The DAS for OHRM will also partner with ODI to ensure efforts to build a diverse workforce and inclusive work environment are embedded and infused in all HR functions across the Department and at all levels.

(4) The DAS for OHRM will provide submissions for the Department-level MD-715 report as requested.

**f. Deputy Assistant Secretary for Office of Resolution Management**

(1) While overseeing the EEO complaint process, the DAS for the Office of Resolution Management (ORM) will partner with ODI to perform training, technical assistance site visits, and EEO Program reviews as needed and appropriate. This includes providing timely information on Alternative Dispute Resolution, EEO complaint activity, and findings of discrimination.

(2) The DAS for the ORM will ensure that a representative is present at the quarterly MD-715 meetings held by ODI.

**g. Office of Employment Discrimination Complaint Adjudication.** The DAS for Office of Employment Discrimination Complaint Adjudication will provide submissions for the Department-level MD-715 report as requested.

**h. Director, Workforce Analysis and Director, Outreach and Retention**

(1) The Director for Workforce Analysis will prepare and submit the VA-wide MD-715 EEO Plan and Program Status Report to EEOC annually, in accordance with EEOC's MD 715 and related instructions.

(2) The Director for Workforce Analysis will ensure VA Administrations submit separate MD-715 Plans and Reports to EEOC in a timely manner.

(3) The Director for Workforce Analysis and the Director for Outreach and Retention will conduct VA-wide barrier analysis on a continuous basis and develop action plans to eliminate barriers to EEO.

(4) The Director for Workforce Analysis and the Director of Outreach and Retention will also conduct quarterly reviews to monitor the progress of the planned initiatives outlined in the action plans (Part H, I, and J) of the current MD-715 report.

i. **VA Staff Offices and Staff Organizations.** References to VA Staff Office and Staff Organizations shall signify only those VA Staff Office and Staff Organizations in **excess of 500 employees**<sup>1</sup>. These Staff Office and Staff Organizations will work with ODI to analyze their workforce, document findings, develop corrective action plans, and submit to ODI on an annual basis (50 calendar days after the end of the fiscal year).

j. **Administration EEO Directors (Veterans Health Administration (VHA) and Canteen Services, Veterans Benefit Administration (VBA), and the National Cemetery Association (NCA))**

(1) Each Administration will complete an annual Administration-wide MD-715 EEO Plan and Program Status Report.

(2) Each Administration will conduct on-going barrier analysis (Administration-wide) and develop action plans to eliminate barriers to EEO for their respective Administrations. The barrier analysis report, with planned activities, will be provided to the Director for Workforce Analysis.

(3) Each Administration will also provide a quarterly written progress report on planned initiatives outlined in their respective action plans (Part H, I, and J) of the current MD-715 report.

k. **Facility Directors.** Each VHA (including Canteen Service), VBA, and NCA field facility Director, or designee, will complete a MD-715 EEO Plan and Program Status Report at the end of each fiscal year and submit it to their respective Administration EEO Director for review and roll-up into the Administration-wide Plan/Report.

#### 4. MD-715 EEO PLAN AND PROGRAM STATUS REPORT

a. Each Administration and facility completing a MD-715 Plan/Report must follow the line-by-line instructions issued by EEOC. See <http://eeoc.gov/federal/directives/715instruct/section3.html>. Applicant information for

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<sup>1</sup> As of August 31, 2014, staff offices or organizations in excess of 500 employees are the Office of General Counsel, Office of Human Resources and Administration, Office of Information Technology, the Board of Veterans Appeals, the Office of Acquisition, Logistics, and Construction, the Office of Management,

hires, internal competitive promotions, and career development programs shall be included in the report. Applicant information is dependent on data availability<sup>2</sup>.

b. In the executive summary, each Administration must follow the outline established in the MD-715 section entitled “EEOC FORMS and Documents Included with This Report.”(See Appendix A)

c. Each Administration, including VA Staff Offices and Staff Organizations, must electronically submit a completed self-assessment (Part G Checklist) to the Director for Workforce Analysis no later than 50 calendar days after the end of the fiscal year.

d. Each Administration must submit their reports electronically to EEOC no later than January 31, unless instructed to the contrary by EEOC.

e. If an Administration is unable to meet EEOC’s deadline, the Administration must notify the ODI Director for Workforce Analysis no later than one calendar week prior to the submission deadline. The notification must be in writing and include the reasons for the tardiness and the new proposed submission date.

f. ODI is obligated to notify the corresponding VA Administration Under Secretary of the risk of noncompliance to EEOC’s original deadline.

g. If required, ODI will request an extension from EEOC on behalf of the delinquent Administration.

h. Each Administration is required to electronically submit a signed MD-715 report by the head of the Administration to ODI no later than 10 business days following its submission to EEOC. Each Administration must ensure the report is 508 compliant and it includes all parts and tables in a single file.

## 5. PROGRESS REVIEWS

a. Each Administration must provide a written progress report on planned initiatives (Part H, I, and J) at least 3 days prior to the quarterly MD-715 meetings held by ODI.

b. Upon request from ODI, each VA Staff Office and Staff Organization shall provide a written progress report on planned initiatives (Part H, I, and J) at least 3 days prior to the quarterly MD-715 meetings held by ODI.

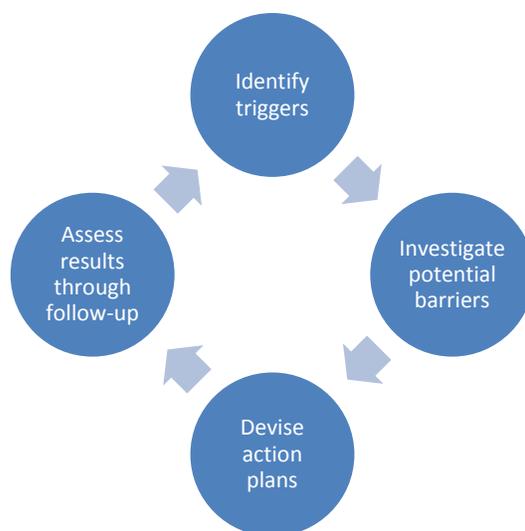
c. The EEO manager or designated representative for each Administration and VA Staff Office and Staff Organization, the Office of Human Resource Management must attend the quarterly MD-715 meetings.

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<sup>2</sup> Currently, VA’s HR system cannot separate internal competitive promotions from the applicant data. Refer to tables 7, 9 and 11

d. Upon request from ODI, representatives from other offices may be required such as but not limited to the Office of Resolution Management, the Office of Employment Discrimination Complain Adjudication.

**6. BARRIER ANALYSIS PROCESS AND ACTION PLANNING.** The following paragraphs outline the barrier analysis process that each Administration must follow:



**a. Identify triggers.**

(1) VA Staff Offices, Staff Organizations and Administrations will analyze their workforce data for each race/ethnicity/gender group (REG) and disability status against the proper benchmarks (see below) using VHA Support Service Center (VSSC) applications and ProClarity to identify triggers. The VA Staff Offices and Staff Organizations and VA Administrations will use other quantitative and qualitative techniques as they become available from the ODI Workforce Analysis division.

Snapshot	Typical Benchmark
Total, Permanent, Temporary and Non-Appropriated Workforce	Civilian Labor Force <sup>3</sup> (CLF) /Relevant Civilian Labor Force <sup>4</sup> (RCLF)
Major Occupations, and Applicants and Hires for Major Occupations	RCLF for the Occupation
Grade Level Distribution (Table 4-2 and 5-2), Career Development Recognition and Awards	Total Workforce
Promotions	Total Workforce from previous fiscal year / Feeder Grades
Separations	Total Workforce from previous fiscal year / Rate Difference of Voluntary v. Involuntary
Applicant Data (Tables 7, 9, 11, 12) <sup>5</sup>	RCLF for the occupations meeting the requirements for each table (except for Table 12) For Table 12, workforce available to apply

(2) VA Staff Offices and Staff Organizations and VA Administrations must also analyze complaints data, conversations with EEO and HR staffs, anecdotes from unions and affinity groups, employees and managers, results of surveys, focus groups, exit interviews, and reports by outside organizations to identify triggers. Reliance solely on workforce statistics will not suffice.

b. **Investigate potential barriers.** The goal of this step is to establish connections between identified triggers and policies, procedures, practices, or conditions.

(1) VA Administrations must develop requests for additional information based upon workforce statistics, complaints, and other preliminary data, when necessary.

(a) The information requests begin the process of determining who must be interviewed and the design and development of the interview questions; they serve as a roadmap for the barrier analysis investigation.

(b) The interview questions must aim to uncover the specific policy, practice, procedure, and/or condition that is currently serving as a barrier to EEO. It is the responses to those questions that may identify additional personnel to interview and

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<sup>3</sup> The Civilian Labor Force (CLF) consists of all U.S. citizens 16 years of age and over, excluding those in the Armed Forces, who are employed or unemployed and seeking employment in all U.S. occupations. The CLF does not include Puerto Rico or other U.S. territories.

<sup>4</sup> The Relevant Civilian Labor Force (RCLF) consists of all U.S. citizens 16 years of age and over, excluding those in the Armed Forces, who are employed in or unemployed and seeking employment in VA specific occupations. When the organization has a presence in Puerto Rico, the population of Puerto Rico is included.

<sup>5</sup> Capability to isolate on applicants meeting the internal competitive criteria does not exist. ODI is working with OPM to add this capability.

determine what modification needs to take place in order to eliminate the identified barrier.

(2) VA Administrations must gather and review documents. Such documents include, but are not limited to: agency policies found in regulations, handbooks, executive directives, etc.; organization/function/staffing charts; funding and resourced documentation; records of hiring, promotions, disciplinary actions, etc.; plans and mission statements; statistical data and other computations; any additional documents referred to in interviews or otherwise pertinent inquiries and conversations; and agency accomplishments.

(3) VA Administrations must interview knowledgeable individuals, including line employees, supervisors, managers, senior executives, union representatives, etc. Anyone who has knowledge of the specific workplace policies, practices, procedures, or conditions you reviewed must be interviewed, either individually or as part of a focus group, to include, where appropriate: officials in charge of programs or organizational segments where triggers were found; employees inside and outside the unit who are abreast of the trigger situation(s); HR and Budget personnel; unions; and affinity groups.

(a) How to Interview.

1. State clearly the purpose of the interview at the outset.

2. Begin with open-ended questions designed to elicit the interviewee's knowledge of the particular circumstances being investigated. For example, what are the external hiring opportunities for the agency, what criteria are considered in the development of the agency recruitment plan for 0610s Nurse, how award recipients are selected, how disciplinary actions are determined, etc. For a list of sample questions, see <http://eeoc.gov/federal/directives/715instruct/section2.html>.

3. Follow-up with more detailed, pointed questions based on the interviewee's initial responses. Please note that just because a list of questions was developed in preparation for the interview does not mean the interviewer has to adhere to those questions. Approach every interview with an open and unbiased mind. There is a strong possibility that new information may surface, and the interviewer will need to be flexible enough to proceed.

4. Seek to clarify answers when necessary.

5. Keep a friendly and conversational tone, bearing in mind that an interview is not an inquisition.

6. Keep asking "why" (drilling-down) until a testable answer emerges. Narrow the questions down to specifics instead of general/broad topics. The overarching goal of the interview is to pinpoint the potential barrier(s).

(b) VA Administrations must document interviews thoroughly. An informal memorandum of record is sufficient. Record the date of the interview and the name, title, and responsibilities of each interviewee. The questions asked must be included in the documentation, either on the interview memorandum or in a separate file. The interviewee's responses must be recorded in as much detail as possible (additional people might be utilized for transcription purposes).

(c) The information discovered through the interview process is conditional and only a working hypothesis. The discovery is not a barrier until it has been tested and proved through a well-developed action plan.

(4) VA Administrations must form a working hypothesis about the root cause(s) of the observed triggers that can be tested through the development and implementation of an action plan.

c. **Devise action plan.** When devising an action plan to address the barrier, VA Administrations must use Part I of the MD-715 report, which has eight essential features. These are:

(1) **Statement of condition that was a trigger for a potential barrier.** Begin with a statement and description of the trigger(s) identified during the barrier analysis process. State how the trigger was identified.

(2) **Barrier analysis.** Describe the steps taken and data analyzed to determine the cause of the trigger. This statement must clearly outline how the connection between the trigger(s) and the policy, practice, procedure, and/or condition identified was established as the potential barrier.

(3) **Statement of identified barrier.** Provide a statement of the identified potential barrier(s) with enough specifics to formulate a working hypothesis as to how it might be eliminated.

(4) **Objective.** State clearly the objective(s) for eliminating the potential barrier(s).

(5) **Responsible official.** State clearly the title (not name) of the official(s) given the responsibility for carrying out the action plan.

(6) **Date objective initiated.** State clearly the date on which each objective was initiated (month, day, and year).

(7) **Target date for completion of objective.** State clearly the target date for completing the action plan (month, day, and year).

(8) **Planned activities toward completion of objective.** Include specific activities or milestones to be carried out towards the completion of the stated objective(s). Activities must be described in detail and must make clear the progression of the action plan from

start to finish. Target dates (month, day, and year) for the completion of each milestone must also be included. See Appendix B for example.

d. **Assess results through follow-up**

(1) VA Administrations must conduct a follow-up after two or more fiscal years from the completion of the action plan in order for trends to be more palpable.

(2) VA Administrations must revisit the trigger(s) identified in the beginning. Indicators that the practice or procedure in question was a barrier and successfully eliminated include, but are not limited to: increases in participation rates of affected groups; declines in separation rates of affected groups; a drop in the number of EEO complaints filed on particular bases or issues; positive survey or focus group results indicating improved employee morale; favorable responses in exit interviews; and increased productivity.

(3) If indicators of success are not present, the wrong barrier was identified or the identified barrier was correct, yet the action plan gave rise to a new barrier. A review of the findings may be warranted and another action plan developed.

## 7. DEFINITIONS

a. **Affirmative Employment Program.** Programs are required by 29 Code of Federal Regulations (CFR) 1614, Executive Order (EO) 11478, and other laws and regulations that prohibit employment discrimination based on race, color, religion, sex, national origin, disability, or age. Such programs, mandate that agencies promote the full realization of equal employment opportunity, and generate plans that contain workforce analysis of the distribution of each group compared to the benchmark, identifying areas where the group has a low or less than expected participation rate and responsive strategies that address identified barriers.

b. **Applicant.** A person who applies for employment, an internal competitive promotion, internal competitive appointment to SES, or career development training at VA.

c. **Barrier.** An agency policy, procedure, practice, and/or condition that limits or tends to limit employment opportunities for individuals of any race, ethnicity, gender group, or disability status.

d. **Diversity.** Workforce diversity is characterized by all that makes us unique, including but not limited to race, color, national origin, ethnicity, sex, sexual orientation, gender identity, religion, disability status, age, and mutable characteristics such as educational background, socioeconomic status, organizational level, geographic region, and cognitive/intellectual perspective.

e. **Employee.** Members of the agency's permanent (position which has been established without time limit, or for a period of a year or more, or which, in any event, has been occupied for a year or more regardless of the intent when it was established) or temporary (position that has been established for a limited period of less than a year and which has not been occupied for more than a year) workforce, whether full- or part-time and whether in competitive or excepted service positions.

f. **Equal Employment Opportunity.** The laws, amendments and associated regulations that prohibit discrimination in the terms, conditions, or privileges of employment, on the basis of race, color, religion, sex, national origin, age, disability, genetic information, as well as reprisal for participating in protected activity (see legal references below). This includes the requirement to hire and promote qualified individuals with disabilities.

g. **Ethnicity.** Ethnicity refers to Hispanic or Latino origin. Single race categories include White, American Indian and Alaska Native, Asian American, Black or African American, and Native Hawaiian or Other Pacific Islander. Individuals may self-identify in more than one race category. In some computer-generated tables there is limited space to write out the entire title, although it is implied.

h. **Follow-up.** Assessment of the results from previous reporting cycles in terms of whether or not the action plan implemented in prior years was successful in eliminating the identified barrier(s).

i. **Gender.** An employee's sex .

j. **Inclusion.** Practices that enable the full participation and contribution of the workforce in support of the mission of the organization by eliminating implicit and explicit barriers. Inclusion involves leveraging the diverse talents and attributes of the entire workforce by configuring work opportunities, business processes, functional operations, rewards systems, work-life options, professional interactions, communications, information-sharing, and decision-making to empower the full participation of all employees.

k. **Race/Color.** Personal characteristics associated with race or color (e.g. hair texture, skin color, skin color complexion, or certain facial features).

l. **Trigger.** Trend, disparity, or anomaly that suggests the need for further inquiry into a particular employment policy, practice, procedure, and/or condition to identify and examine the underpinning causal factors.

## 8. REFERENCES

a. **Management Directive (MD) 715** - issued by EEOC and effective October 1, 2003, the MD-715 provides policy guidance and standards for equal employment

programs under section 717 of Title VII and for affirmative action programs under section 501 of the Rehabilitation Act, and sets forth general reporting requirements. MD-715 supersedes EEOC MD-712, -713, -714 and related interpretative memoranda. (<http://eeoc.gov/federal/directives/md715.cfm>)

b. **29 CFR, Part 1614** - establishes Federal sector EEO through a continuing affirmative employment program. It provides policies and regulations for the Government's obligation to promote equal employment opportunity and to prohibit discrimination in employment because of race, color, religion, sex, national origin, age, or disability. (<http://www.gpo.gov/fdsys/pkg/CFR-2007-title29-vol4/pdf/CFR-2007-title29-vol4-part1614.pdf>)

c. **EO 11478, Equal Employment Opportunity in the Federal Government** - as amended, it requires each agency to establish and maintain an affirmative program of EEO for all employees and applicants for employment, internal competitive promotions, or career development training. It is the responsibility of each agency head to provide sufficient resources to administer the program effectively, assure that recruitment activities reach all sources of job candidates, utilize the present skills of each employee and provide maximum opportunity to enhance their skills and advance in accordance with their abilities, provide training to managers and supervisors to assure their understanding and implementation of these policies, assure cooperation with schools and public and private groups to improve conditions which affect employability, and provide a system for periodically evaluating the effectiveness of carrying out this order. (<http://www.archives.gov/federal-register/codification/executive-order/11478.html>)

d. **Section 501 of the Rehabilitation Act** - prohibits employment discrimination against individuals with disabilities in the federal sector. <http://www.eeoc.gov/laws/statutes/rehab.cfm>

e. **Section 717 of Title VII of the Civil Rights Act, as amended**- prohibits discrimination based on race, color, religion, sex, national origin, or reprisal, and ensures that each agency has “an affirmative program of equal employment opportunity” for all employees and applicants for employment an internal competitive promotion, or career development training. <http://www.eeoc.gov/laws/statutes/titlevii.cfm>

f. **Technical Assistance for Federal Agencies in using the 2006-2010 Amercian Community Survey** -This document is intended to assist federal agency officials who prepare and submit reports pursuant to EEO Management Directive 715 (MD-715). <http://www.eeoc.gov/federal/directives/upload/Guidance-for-Using-the-2010-EEO-Tabulation-UPDATED-July-2013.pdf>

**EEOC FORMS and Documents Included With This Report**

Each Administration must include the following in the Executive Summary section of MD-715 as required by EEOC:

- Brief paragraph describing the agency’s mission and mission-related functions
- Summary of results of agency’s annual self-assessment against MD-715 “Essential Elements”
- Summary of Analysis of Work Force profiles including net change analysis and comparison to RCLF
- Summary of EEO Plan objectives planned to eliminate identified barriers or correct program deficiencies
- Summary of EEO Plan action items implemented or accomplished

EEOC FORMS and Documents Included With This Report			
* Executive Summary [FORM 715-01 PART E], that includes:		* Optional Annual Self-Assessment Checklist Against Essential Elements [FORM 715-01PART G]	
☞ Brief paragraph describing the agency's mission and mission-related functions		* EEO Plan To Attain the Essential Elements of a Model EEO Program [FORM 715-01PART H] for each programmatic essential element requiring improvement	
☞ Summary of results of agency's annual self-assessment against MD-715 "Essential Elements"		* EEO Plan To Eliminate Identified Barrier [FORM 715-01 PART I] for each identified barrier	
☞ Summary of Analysis of Work Force Profiles including net change analysis and comparison to RCLF		* Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals With Targeted Disabilities for agencies with 1,000 or more employees [FORM 715-01 PART J]	
☞ Summary of EEO Plan objectives planned to eliminate identified barriers or correct program deficiencies		* Copy of Workforce Data Tables as necessary to support Executive Summary and/or EEO Plans	
☞ Summary of EEO Plan action items implemented or accomplished		* Copy of data from 462 Report as necessary to support action items related to Complaint Processing Program deficiencies, ADR effectiveness, or other compliance issues.	
* Statement of Establishment of Continuing Equal Employment Opportunity Programs [FORM 715-01 PART F]		* Copy of Facility Accessibility Survey results as necessary to support EEO Action Plan for building renovation projects	
* Copies of relevant EEO Policy Statement(s) and/or excerpts from revisions made to EEO Policy Statements		* Organizational Chart	

EEOC FORM 715-01 PART I	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT.	
DEPARTMENT OF VETERANS AFFAIRS	FY <u>2013</u>	
<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p><b>Low Promotion Rates for Black Females</b></p> <p>VA is experiencing low promotion rates in General Schedules (GS) for Black females when compared to the promotion rate for the overall workforce.</p>	
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>We reviewed the promotion rates for Black females. Black females had lower promotion rates (11.51%) as compared to the overall promotion rate (13.24%) for permanent entry level positions (GS 3-8). Black females also had lower promotion rates (6.10%) as compared to the overall promotion rate (6.36%) for permanent mid-level positions (GS 9-12). For permanent senior level positions (GS 13-15), Black females had lower promotion rates (7.37%) as compared to the overall promotion rate (8.15%).</p> <p>There were lower promotion rates for Black females transitioning from entry to mid-level positions (GS 8-9). Black females had a promotion rate of 4.55% as compared to the overall promotion rate of 5.37%. There were also lower promotion rates for Black females transitioning from mid to senior level positions (GS 12-13). Black females had a promotion rate of 9.18% as compared to the overall promotion rate of 11.03%.</p>	
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>The cause of the low promotion rates for Black females is unknown. Further examination of the policies, procedures, and practices impacting promotions is needed.</p>	
<p><b>OBJECTIVE:</b></p> <p>State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>Review the policies, procedures, and practices impacting promotions. Eliminate, when possible, any barriers to equal opportunity.</p>	
<p><b>RESPONSIBLE OFFICIAL:</b></p>	<p>Assistant Secretary for Human Resources and Administration; Deputy Assistant Secretary for Human Resources Management; Deputy Assistant Secretary for Office of Diversity and Inclusion; Other Administration HR Officials</p>	
<p><b>DATE OBJECTIVE INITIATED:</b></p>	<p>09/30/2013</p>	
<p><b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b></p>	<p>09/30/2016</p>	

EEOC FORM 715-01 PART I	EEO Plan To Eliminate Identified Barrier	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)	
VA will continue to administer mentoring (formal and informal) programs to promote career development, retention, and upward mobility within the VA workforce.	09/30/2016	
Conduct an educational/training needs assessment for employees and conduct barrier analysis to determine if there are challenges to attaining training.	09/30/2016	
Expand ODI/VALU Pilot program on MyCareer to additional facilities focusing on training/developmental strategies to facilitate promotion.	09/30/2015	
Track and monitor advancement of employees within the pipeline to ensure upward mobility is occurring using the applicant pool data.	09/30/2016	
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE		
<p>In FY 2013, VA/ODI presented training to agency employees at the Blacks in Government National Conference in Dallas, Texas. The training presented information on career development and leadership programs, MyCareer@VA, and other informative sessions to improve upward advancement in VA. In addition to the training, ODI established a Panel discussion titled, "Where Do We Go From Here" in response to the U.S. Equal Employment Opportunity Commission's African American Workgroup Report, which describes seven obstacles to opportunities for African Americans in the federal workforce. The panel was designed to enable employees the opportunity to engage in a moderated dialogue with panel members who shared perspectives and personal experiences of career successes and leadership challenges.</p> <p>The White House Initiative on Historically Black College and Universities (HBCUs), in conjunction with the US Department of Education, hosted a two-day national conference commemorating National HBCU Week and highlighting the significant contributions which HBCUs have made to the Nation. In support of VA's commitment to cultivating more diverse workplace opportunities, the Office of Diversity and Inclusion, nominated one VA employees to attend the 2013 HBCU Conference. The conference enabled VA employees to: 1) Enhance knowledge and understanding on the President's perspective on higher education, funding and the future of HBCUs from a fiscal, philanthropic efforts and federal government support in continuing long standing relationships with HBCUs; 2) Extend relationships between federal agencies and HBCUs; and 3) Develop new professional networks within public, private and intergovernmental entities based on common interests and public service efforts.</p> <p>ODI partnered with VALU to launch a MyCareer@VA pilot aimed at eradicating potential barriers to equal employment opportunity in VA. This joint initiative targeted all employees, specifically in pay levels at and below GS-9/equivalent and in wage grade positions who wish to progress in their field or move to a new field. The pilot program utilized cutting-edge career development tools and resources offered through MyCareer@VA and provided employees with knowledge and resources that can be used to achieve their career goals at VA. Pilot sites were Martinsburg, WV and Washington, DC. VAMCs and an estimated 800 employees participated in the pilot which consisted of three components: 1) Introduction to MyCareer@VA for Employees (live training, in-person); 2) MyCareer@VA for Supervisors and Mentors (live training, in-person); and 3) CareerPower Training Course (virtual, self-paced). Participants reported significantly higher responses to the following: 1) I am currently taking steps to enrich my current job. 2) I am satisfied with what I learned using MyCareer; and 3) I am committed to applying what I learned from MyCareer@VA Next steps: ODI will expand access to pilot and track career outcomes.</p> <p>The Blacks in Government VA Headquarters Chapter conducted its first Annual Induction Mentoring (AIM) Future Leadership of American Government (FLAG) Conference during FY 2013. The Chapter implemented the Senior FLAG consisting of twenty college students from Virginia Commonwealth University. The purpose of the Conference was to assign the students to VA employees who have a desire to mentor. Students received training on financial literacy, leadership, and resume writing and were assigned individual mentors. Mock interviews were also conducted by Senior leadership.</p>		