

United States  
Environmental Protection Agency



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# MD 715 Report

# Fiscal Year 2014

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EEOC FORM 715-01 PART A – D		U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
<b>For period covering October 1, 2013 to September 30, 2014.</b>					
<b>PART A</b> Department or Agency Identifying Information	<b>1. Agency</b>		1. U.S. Environmental Protection Agency		
	1.a. 2 <sup>nd</sup> level reporting component		N/A		
	1.b. 3 <sup>rd</sup> level reporting component		N/A		
	1.c. 4 <sup>th</sup> level reporting component		N/A		
	<b>2. Address</b>		2. 1200 Pennsylvania Avenue, NW		
	<b>3. City, State, Zip Code</b>		3. Washington, D.C. 20460		
	<b>4. CPDF Code</b>	<b>5. FIPS code(s)</b>	<b>4. EP</b>	<b>5. 11</b>	
<b>PART B</b> Total Employment	1. Enter total number of permanent full-time and part-time employees				1. 14,976
	2. Enter total number of temporary employees				2. 929
	3. Enter total number employees paid from non-appropriated funds				3. 0
	<b>4. TOTAL EMPLOYMENT [add lines B 1 through 3]</b>				<b>4. 15,905</b>
<b>PART C</b> Agency Official(s) Responsible For Oversight of EEO Program(s)	1. Head of Agency Official Title		1. Gina McCarthy, Administrator Environmental Protection Agency		
	2. Agency Head Designee		2. Stan Meiburg, Acting Deputy Administrator Environmental Protection Agency  Robert Perciasepe, Former Deputy Administrator Environmental Protection Agency (to July 2014)		
	3. Principal EEO Director/Official Official Title/Series/Grade		3. Velveta Golightly-Howell, Director Office of Civil Rights  Vicki Simons, Former Acting Director Office of Civil Rights (to January 2014)		
	4. Title VII Affirmative EEO Program Official		4. Tina Lancaster, Assistant Director Affirmative Employment, Analysis, and Accountability Program  Cynthia Burrows, Former Acting Assistant Director Affirmative Employment, Analysis and Accountability Programs		
	5. Section 501 Affirmative Action Program Official		5. Christopher Emanuel National Disability Employment Program Manager		
	6. Complaint Processing Program Manager		6. Cynthia Darden Assistant Director for Title VII		
	7. Other Responsible EEO Staff		7. Mirza P. Baig Christopher Emanuel		

	<b>Monica Goldie</b> <b>Gwendolyn James</b> <b>Jerome King</b> <b>*Affirmative Employment, Analysis and Accountability</b> <b>Program Staff</b>
	<b>8. William Haig</b> <b>National Reasonable Accommodations Coordinator</b>

<p>EEOC FORM 715-01 PART A - D</p>	<p>U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</p>
<p style="text-align: center;"><b>PART D</b> List of Subordinate Components Covered in This Report</p> 	<p><b>Subordinate Component and Location (City/State)</b></p> <p><b>Headquarters Program Offices</b> in Washington, DC; Research Triangle Park, NC; Cincinnati, OH; Las Vegas, NV</p> <ul style="list-style-type: none"> <li>Office of the Administrator</li> <li>Office of Administration and Resources Management</li> <li>Office of Air &amp; Radiation</li> <li>Office of the Chief Financial Officer</li> <li>Office of Enforcement &amp; Compliance Assurance</li> <li>Office of General Counsel</li> <li>Office of the Inspector General</li> <li>Office of International and Tribal Affairs</li> <li>Office of Environmental Information</li> <li>Office of Prevention, Pesticides &amp; Toxic Substances</li> <li>Office of Research &amp; Development</li> <li>Office of Solid Waste &amp; Emergency Response</li> <li>Office of Water</li> </ul> <p><b>Regional Offices</b></p> <ul style="list-style-type: none"> <li>Region 1: Boston, MA</li> <li>Region 2: New York, NY</li> <li>Region 3: Philadelphia, PA</li> <li>Region 4: Atlanta, GA</li> <li>Region 5: Chicago, IL</li> <li>Region 6: Dallas, TX</li> <li>Region 7: Lenexa, KS</li> <li>Region 8: Denver, CO</li> <li>Region 9: San Francisco, CA</li> <li>Region 10: Seattle, WA</li> </ul> <p><b>Program Labs:</b></p> <ul style="list-style-type: none"> <li>OAR/ORIA/NAREL: Montgomery, AL</li> <li>ORD, NRM Research Lab: Ada, OK</li> <li>ORD/NERL: Athens, GA</li> <li>ORD/NHEER Labs: <ul style="list-style-type: none"> <li>Narragansett, RI</li> <li>Gulf Breeze, FL</li> <li>Duluth, MN</li> <li>Corvallis, OR</li> </ul> </li> </ul>

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

<b>EEOC FORM 715-01 PART E</b>	<i>U.S. Equal Employment Opportunity Commission</i> <b>FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>	
<b>U. S. Environmental Protection Agency</b>	<b>For period covering October 1, 2013 to September 30, 2014.</b>	
<p><b>EXECUTIVE SUMMARY</b></p> <p><b><u>Agency Mission</u></b></p> <p>The mission of the United States Environmental Protection Agency (Agency or EPA) is to protect human health and the environment. Agency programs and activities are focused on protecting the air we breathe, the water we drink, and the places we live. To accomplish this mission, the Agency partners with federal, state, and local stakeholders to enforce the nation's environmental laws and regulations; conducts world class research; provides financial assistance to state recipients and grantees in support of environmental programs; and employs a highly-educated and diverse workforce. Given the broad scope and critical importance of the Agency's mission, it recognizes that meeting the multitude of responsibilities to the public can only be accomplished with a diverse, inclusive, dynamic, and world-class workforce. To that end, the Agency works vigorously to remove any identified barriers to equal employment opportunity and attract, hire, retain, and promote the most talented individuals in accordance with merit systems principles.</p> <p>Within EPA, the Office of Civil Rights (OCR) is responsible for carrying out the requirements of Management Directive 715 (MD-715). In order to most efficiently and effectively accomplish this duty, OCR partners with the Office of Administration and Resources Management (OARM) and the Office of General Counsel (OGC) to develop and implement programs to protect the Agency's employees and applicants from employment discrimination. This partnership is necessary because OARM is responsible for the effective management of the Agency's human, financial and physical resources, including: race and national origin data; and diversity and inclusion efforts. Moreover, OGC provides extensive legal counsel to OCR on all matters concerning their MD-715 responsibilities.</p> <p>The Agency is pleased to share this brief summary of the programs, activities, and accomplishments for Fiscal Year (FY) 2014, which document its efforts toward building and sustaining a model Equal Employment Opportunity (EEO) program based on the six essential elements identified by the U.S. Equal Employment Opportunity Commission (EEOC).</p> <p><b><u>Results of the Agency's Annual Self-Assessment</u></b></p> <p>The Agency conducted its annual self-assessment against the MD-715 Essential Elements. EPA has met almost all of the measures successfully. The following highlights the Agency's FY 2014 self-assessment results, which are detailed in Part G.</p> <p>❖ <b><u>Demonstrated Commitment from Agency Leadership</u></b></p> <ul style="list-style-type: none"> <li>➤ On December 3, 2013, Administrator McCarthy affirmed her commitment to EEO and diversity at the Agency by issuing the 2014 Equal Employment Opportunity Policy Statement.</li> </ul>		

- Senior Executives are held accountable for fostering diversity for all employees, including those individuals with disabilities, pursuant to Executive Order 13548 through their performance appraisals.
- OCR briefed the Agency's senior leaders and advisors on the FY 2013 MD-715 report and State of EEO.
- The first agency-wide Diversity & Inclusion training for supervisors and managers was conducted, which was comprised of interactive sessions focused on strengthening cultural competency and management skills for leading inclusive environments. The training also explored solutions for addressing unconscious perceptions and other ways to maximize employee engagement, performance and retention. Over 1500 supervisors and managers, 90% of the supervisory workforce, participated in the 27 sessions across the agency.
- The first in a series of informational, cultural awareness sessions on sexual orientation and gender identity. Matthew Murphy, Esq., founder and president of FEDQ, a national lesbian, gay, bisexual and transgender employee resource group, led the discussion on understanding the concepts of gender identity, gender expression, sex and sexual orientation.
- 13 Reasonable Accommodation and Section 508 training courses throughout the Regions and Assistant Administrativeships (AAships) were provided; approximately 188 managers/supervisors and 36 employees attended them.

#### ❖ Integration of EEO into the Agency's Strategic Mission

- Administrator McCarthy issued the EPA FY 2014-2018 Strategic Plan, which established *Embracing EPA as a High-Performing Organization* as a Cross-Agency Strategy. A key element of this strategy is to maintain and attract the workforce of the future to ensure that EPA's employees represent diverse backgrounds and perspectives, are equipped with the most current technical skills, tools, and knowledge, and are positioned to effectively accomplish the Agency's mission and meet evolving environmental and sustainability challenges.
- Internal and external guidance on Minority Academic Institution (MAI) partnerships was issued.
- A target goal for FY 2014 MAI Agency support was established.
- Job announcements were disseminated to entities included on its recruitment source list and external stakeholders in accordance with the Office of Diversity, Advisory Committee Management and Outreach's (ODACMO) Standard Operating Procedure.
- All EPA Regions and Headquarter Programs and Offices updated their own MD-715 Action Plans, which incorporated EEO, Human Resources, and Diversity initiatives. In addition, these Action Plans promoted the six essential elements of a model EEO Program.

#### ❖ Management and Program Accountability

- EPA policies, training, and leadership actions communicate a clear and consistent message that managers and employees share responsibility for creating a workplace free of barriers to EEO.

- An orientation was held for the Deputy Civil Rights Officials (DCRO), who are senior leaders whose performance appraisals explicitly require them to assist OCR on national civil rights efforts as well as oversee civil rights programs within their respective organizations. The orientation identified DCROs' roles and responsibilities.
- OCR conducted twenty-three Technical Assistance Visits (TAVs) with regions and AAships to provide feedback on their FY-2014 MD-715 action plans and guidance to enhance the development of planned activities for FY 2015.
- The Diversity and Inclusion Advisory Committee (DIAC), a standing subcommittee of the Human Resources Council and it provides senior leadership oversight, counsel, and recommendations concerning the Agency's diversity and inclusion efforts, met quarterly. These meetings prioritized the discussion of: 1) diversity and inclusion performance standards for GS Managers/Supervisor; 2) *Management Guidance on Expanding Workplace Inclusion*; 3) the Inclusion Dashboard, which will be based on the inclusion quotients in the federal employee viewpoint survey; 4) the Inclusion Action Plan, which will be based on inclusion activities developed by AAships and Regions; and 5) the evaluation of the roles and responsibilities of SEPMs.
- Examples of Regional and Program/Office Activities:
  - In Region 1, the OARM Director, Office of Civil Rights and Urban Affairs (OCRUA) Director, and Office of Human Resources Director met regularly to ensure that the promotion of diversity and inclusion was incorporated into the Region's strategic workforce planning.
  - In Region 4, the Office of Civil Rights and the Office of Human Resources conducted hiring panel discussions with each member of divisional leadership.
  - In the Office of Air and Radiation (OAR), annual management reviews were conducted with each Office Directors to provide guidance on established personnel policies and procedures.

#### ❖ Proactive Prevention of Unlawful Discrimination

- No FEAR training was offered to EPA's workforce and 99.5% of employees completed it. This training educated them on employee rights and responsibilities in the EEO process.
- The Office of the Chief Financial Officer (OCFO), Office of Environmental Information (OEI), Office of General Counsel (OGC), Office of Inspector General (OIG), Office of Air and Radiation (OAR), Office of Administration and Resources Management (OARM), and every regional office attained a 100% completion rate.
- All EPA job announcements were required to go through the Shared Service Centers, where they are broadly distributed using a list of diverse recruiting sources compiled by the Office of Diversity, Advisory Committee Management and Outreach.
- The Area directors, EEO officers and civil rights helped select the training and retain forty-four professional, collateral duty EEO Counselors in FY 2014.
- EEO Counselors participated in monthly EEO training teleconferences hosted by the OCR Employee Complaints Resolution Division (ECRD). Although not required, EEO Officers and Specialists participated in training when available.

- EPA has two sets of reasonable accommodation procedures: 1) AFGE bargaining unit members and applicants for AFGE bargaining unit positions titled *National Reasonable Accommodation Procedures*; and 2) EPA's *Reasonable Accommodation Procedures for Employees and Applicants with Disabilities*. Both documents are made available to all employees on EPA's intranet site at: <http://intranet.epa.gov/civilrights/reasonableaccommodation.htm>. The NRAC regularly briefed the Director of Civil Rights and LORACs on compliance with written procedures.

- **Efficiency**

- In FY 2014, the actual timeliness rate reported for processing complaints was 86%. Work performed by the counselors continues to be monitored for technical accuracy and to ensure regulatory timeframes are met.
- EEO Counselors participated in monthly EEO training teleconferences hosted by the OCR Employee Complaints Resolution Division (ECRD). Although not required, EEO Officers and Specialists participated in training when available.
- OCR required all eleven contracted investigators to attend monthly EEO refresher training, which included mock counseling sessions; updates on EEO case law developments; and guidance from EEO professionals and attorneys.
- In addition, OCR maintained its standard operating procedures (SOPs) to provide guidance regarding the way EEO cases are processed at EPA. To increase compliance with the regulations, the SOP identifies case processing timelines, including legal review. In FY 2014, OCR maintained a Statement of Work with its contractor, which includes penalties when investigatory materials are late.
- EPA employees were offered the opportunity to re-certify their race, national origin, and disability status.

- **Responsiveness and Legal Compliance**

- The Agency had the least complaints filed in the past six fiscal years.
- From FY 2013 to 2014, the number of complaint investigations that exceeded the regulatory time frames reduced from 21 to 1.
- At the end of FY 2014, there were 20 FADs pending review and issuance.

## **Workforce Analysis**

### ***Total Workforce***

At the close of FY 2014, EPA employed 14,976 (94.2%) full/part time permanent and 929 (5.84%) temporary employees for a total of 15,905 employees. This was a significant net decrease of 912 (83.14%) full-time/part-time permanent employees and a net decrease of 185 (1.69%) temporary employees for a total net decrease of 1097 (5.8%) employees compared to FY 2013. However, the total workforce of males comprised 48.02 % (7,629) of the permanent workforce as compared to 51.86% of the national civilian labor force (CLF). Females comprised 51.98% (8,259) of the workforce as compared to 48.14% of the CLF.

In FY 2014, EPA received approval to offer and participate in Voluntary Separation Incentive Payment (VSIP) and Voluntary Early Retirement Authority (VERA) opportunities, where specific grades, occupational series, and geographic locations were designated. The following occupations were approved between the grades GS 12 – GS 15: Biologists, Chemists, Ecologists, Engineers, Physical Scientists, and Toxicologists. All offices across EPA elected to participate with the exception of the Office of Air and Radiation (OAR), Office of International and Tribal Affairs (OITA), and Office of General Counsel. The total number of EPA employees that took advantage of the VERA/VSIPs was 454.

### ***Representation of Class Groups***

The data in Table A1 shows the workforce profile for permanent employees:

White men comprised 37.61% (5,982) of the workforce compared to 38.33% of the CLF.  
 White women comprised 30.21% (4,805) of the workforce compared to 34.03% of the CLF.  
 Black men comprised 4.61% (733) of the workforce compared to 5.49% of the CLF.  
 Black women comprised 12.72% (2,023) of the workforce compared to 6.53% of the CLF.  
 Hispanic men comprised 2.87% (457) of the workforce compared to 5.17% of the CLF.  
 Hispanic women comprised 3.41% (543) of the workforce compared to 4.79% of the CLF.  
 Asian men comprised 3.18% (505) of the workforce compared to 1.97% of the CLF.  
 Asian women comprised 3.27 % (520) of the workforce compared to 1.93% of the CLF.  
 Native Hawaiian men comprised 0.04% (7) of the workforce compared to 0.07% of the CLF.  
 Native Hawaiian women comprised 0.06 % (9) of the workforce compared to 0.7% of the CLF.  
 American Indian men comprised 0.26% (42) of the workforce compared to 0.55% of the CLF.  
 American Indian women comprised 0.40% (64) of the workforce compared to 0.53% of the CLF.  
 Two or More Races Men comprised 0.58% (93) of the workforce compared to 0.26% of the CLF.  
 Two or More Races women comprised 0.69% (110) of the workforce compared to 0.28% of the CLF.

EPA also collected information concerning its temporary employees which can be found in Tables A1 and B1.

At the close of FY 2014, EPA employed 372 (2.48%) full/part time permanent and 6 (0.65%) temporary employees for a total of 378 (2.38%) employees with Targeted Disabilities. The federal-wide goal is 2.0%. The total represents a net increase of 176 (1.25%) full/part time permanent employees and a net increase of 1 (0.20%) temporary employees for a net increase of 177 (1.20%) employees compared to FY 2013.

### **Summary of Fiscal Year 2014 Accomplishments**

As detailed in Part H and I, EPA made significant progress in the areas of recruitment, hiring, promotion, retention, and succession planning. For instance, the Agency developed a centralized

recruitment source list and disseminated all job announcements to them. EPA believes this effort may have improved the triggers previously identified with the:

- New hire application rates of Hispanic Females; qualification rates of Black Females, White Females, and Native Hawaiian Females; and selection rates of White Females, which diminished from FY 2013 to FY 2014.

Furthermore, the representation of individuals with targeted disabilities in EPA's workforce increased from 201 (1.20%) to 372 (2.38%). The total number of full/part time temporary and permanent employees with qualified individuals with a reportable disability increased by 0.73% from FY 2013 to FY 2014.

EPA also plans to update the exit interview form and process to track the motivation for employees' departure from Agency employment. By furthering its understanding of employees' reasons for leaving the Agency, EPA aims to improve its ability to retain talented staff.

While EPA made noteworthy progress in FY 2014, there are still numerous opportunities for growth. In particular, most of the planned activities in Part I of the FY 2013 MD-715 Report have been carried over with anticipated completion dates in FY 2015. The focus is on the use of hiring panels and career development opportunities to decrease triggers associated with the new hire qualification and selection rates; and the internal competitive promotion and senior grades data generally.

During FY 2014, EPA planned a number of activities to improve our understanding of triggers and establish a model EEO program, including the development of:

- A hiring survey to examine the hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified.
- A process to collect, retain, and analyze applicant flow data for Series 0905 Attorney positions.
- A tool to evaluate the effectiveness of the strategic recruitment plan and guidance document.
- A tool to assess the effectiveness of career development activities.
- A process for collecting internal SES applicant flow data in accordance with the requirements of MD-715.

Additionally, goals have been set using Part J, regarding PWTD in an effort to ensure that they are converted to competitive positions, when appropriate.

EEOC FORM 715-01 PART F	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT
U. S. Environmental Protection Agency	For period covering October 1, 2013 to September 30, 2014.

CERTIFICATION of ESTABLISHMENT of CONTINUING  
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS

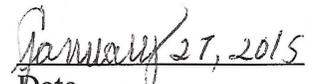
I, Velveta Golightly-Howell, Director of Civil Rights, am the Principal EEO Director/Official for the US Environmental Protection Agency.

EPA has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and, as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program, are included with this Federal Agency Annual EEO Program Status Report.

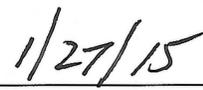
EPA has also analyzed its workforce profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice is operating to disadvantage any group based on race, national origin, gender or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.

  
 \_\_\_\_\_  
 Signature of Principal EEO Director/Official  
 Certifies that this Federal Agency Annual EEO Program  
 Status Report is in compliance with EEO MD-715.

  
 \_\_\_\_\_  
 Date

  
 \_\_\_\_\_  
 Signature of Agency Head or Agency Head Designee

  
 \_\_\_\_\_  
 Date

<b>Part G: Agency Self-Assessment</b>			
<b>Essential Element A: Demonstrated Commitment From Agency Leadership</b>			
Requires EPA head to issue written policy statements ensuring a workplace free of discriminatory harassment and a commitment to equal employment opportunity.			
EEOC MD 715 Agency Assessment Questions	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to EPA's Status Report
	Yes	No	
Compliance Indicator: EEO policy statements are up-to-date.			
1. EPA Head was installed on June 18, 2013. The EEO policy statement was issued September 7, 2012 by the previous Acting Administrator. Was the EEO Policy Statement issued within 6 - 9 months of the installation of EPA Head? If no, provide an explanation.	X		New Administrator issued policy statement in January 2014.
2. During the current Agency Head's tenure, has the EEO Policy Statement been reissued annually? If no, provide an explanation.	X		
3. Are new employees provided a copy of the EEO Policy Statement during orientation?		X	The EEO Policy statement is not provided to new employees during all orientations. The EEO Policy Statement is emailed to all employees on an annual basis and is available electronically on the EPA intranet. Please see Part H-4.
4. When an employee is promoted into the supervisory ranks, is s/he provided a copy of the EEO Policy Statement?	X		
5. Have the heads of subordinate reporting components communicated support of all Agency EEO policies through the ranks?	X		
6. Has EPA made written materials available to all employees and applicants, informing them of the variety of EEO programs and administrative and judicial remedial procedures available to them?	X		
7. Has EPA prominently posted such written materials in all personnel offices, EEO offices, and on EPA's internal website? [see 29 CFR §1614.102(b)(5)]	X		

Compliance Indicator: Agency EEO policy is vigorously enforced by Agency management.			
8. Are managers and supervisors evaluated on their commitment to Agency EEO policies and principles, including their efforts to:	X		
9. Resolve problems/disagreements and other conflicts in their respective work environments as they arise?	X		
10. Address concerns, whether perceived or real, raised by employees and following-up with appropriate action to correct or eliminate tension in the workplace?	X		
11. Support EPA's EEO Program through allocation of mission personnel to participate in community outreach and recruitment programs with private employers, public schools and universities?	X		
12. Ensure full cooperation of employees under his/her supervision with EEO office officials such as EEO Counselors, EEO Investigators, etc.?	X		
13. Ensure a workplace that is free from all forms of discrimination, harassment and retaliation?	X		
14. Ensure that subordinate supervisors have effective managerial, communication and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications?	X		
15. Ensure the provision of requested religious accommodations when such accommodations do not cause an undue hardship?	X		
16. Ensure the provision of requested disability accommodations to qualified individuals with disabilities when such accommodations do not cause an undue hardship?	X		
17. Have all employees been informed about what behaviors are inappropriate in the workplace and that this behavior may result in disciplinary actions?	X		
18. Describe what means were utilized by EPA to so inform its workforce about the penalties for unacceptable behavior.	X		

19. Have the procedures for reasonable accommodation for individuals with disabilities been made readily available/accessible to all employees by disseminating such procedures during orientation of new employees and by making such procedures available on the World Wide Web or Internet?	X		
20. Have managers and supervisor been trained on their responsibilities under the procedures for reasonable accommodation?	X		

**Essential Element B: Integration of EEO into EPA's Strategic Mission**

Requires that EPA's EEO programs be organized and structured to maintain a workplace that is free from discrimination in any of EPA's policies, procedures or practices and supports EPA's strategic mission.

EEOC MD 715 Agency Assessment Questions	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to EPA's status report.
	Yes	No	
Compliance Indicator: The reporting structure for the EEO Program provides the Principal EEO Official with appropriate authority and resources to effectively carry out a successful EEO Program.			
21. Is the EEO Director under the direct supervision of EPA head? [see 29 CFR §1614.102(b)(4)] For subordinate level reporting components, is the EEO Director/Officer under the immediate supervision of the lower level component's head official? (For example, does the Regional EEO Officer report to the Regional Administrator?)	X		
22. Are the duties and responsibilities of EEO officials clearly defined?	X		
23. Do the EEO officials have the knowledge, skills, and abilities to carry out the duties and responsibilities of their positions?	X		
24. If EPA has 2 <sup>nd</sup> level reporting components, are there organizational charts that clearly define the reporting structure for EEO programs?	N/A		
25. If EPA has 2 <sup>nd</sup> level reporting components, does EPA-wide EEO Director have authority for the EEO programs within the subordinate reporting components?	N/A		
If not, please describe how EEO program authority is delegated to subordinate reporting components.			

Compliance Indicator: The EEO Director and other EEO professional staff responsible for EEO programs have regular and effective means of informing EPA head and senior management officials of the status of EEO programs and are involved in, and consulted on, management/personnel actions.			
26. Does the EEO Director/Officer have a regular and effective means of informing EPA head and other top management officials of the effectiveness, efficiency and legal compliance of EPA's EEO program?	X		
27. Following the submission of the immediately preceding FORM 715-01, did the EEO Director/Officer present to the head of EPA and other senior officials the "State of EPA" briefing covering all components of the EEO report, including an assessment of the performance of EPA in each of the six elements of the Model EEO Program and a report on the progress of EPA in completing its barrier analysis including any barriers it identified and/or eliminated or reduced the impact of?	X		
28. Are EEO (Regional) program officials present during agency deliberations prior to decisions regarding recruitment strategies, vacancy projections, succession planning, selections for training/career development opportunities, and other workforce changes?	X		
29. Does EPA consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions such as re-organizations and re-alignments?	X		
30. Are management/personnel policies, procedures and practices examined at regular intervals to assess whether there are hidden impediments to the realization of equality of opportunity for any group(s) of employees or applicants? [see 29 C.F.R. § 1614.102(b)(3)]	X		

31. Is the EEO Director included in EPA's strategic planning, especially EPA's human capital plan, regarding succession planning, training, etc., to ensure that EEO concerns are integrated into EPA's strategic mission?	X		
Compliance Indicator: EPA has committed sufficient human resources and budget allocations to its EEO programs to ensure successful operation.			
32. Does the EEO Director have the authority and funding to ensure implementation of agency EEO Action Plans to improve EEO program efficiency and/or eliminate identified barriers to the realization of equality of opportunity?	X		
33. Are sufficient personnel resources allocated to the EEO Program to ensure that agency self-assessments and self-analyses prescribed by EEO MD-715 are conducted annually and to maintain an effective complaint processing system?	X		
34. Are statutory/regulatory EEO related Special Emphasis Programs sufficiently staffed?	X		
35. Federal Women's Program - 5 U.S.C. 7201; 38 U.S.C. 4214; Title 5 CFR, Subpart B, 720.204	X		
36. Hispanic Employment Program - Title 5 CFR, Subpart B, 720.204	X		
37. People With Disabilities Program Manager; Selective Placement Program for Individuals With Disabilities - Section 501 of the Rehabilitation Act; Title 5 U.S.C. Subpart B, Chapter 31, Subchapter I-3102; 5 CFR 213.3102(t) and (u); 5 CFR 315.709	X		
38. Are other agency special emphasis programs monitored by the EEO Office for coordination and compliance with EEO guidelines and principles, such as FEORP - 5 CFR 720; Veterans Employment Programs; and Black/African American; American Indian/Alaska Native, Asian American/Pacific Islander programs?	X		

Compliance Indicator: EPA has committed sufficient budget to support the success of its EEO Programs.			
39. Are there sufficient resources to enable EPA to conduct a thorough barrier analysis of its workforce, including the provision of adequate data collection and tracking systems?	X		
40. Is there sufficient budget allocated to all employees to utilize, when desired, all EEO programs, including the complaint processing program and ADR, and to make a request for reasonable accommodation? (Including subordinate level reporting components?)	X		
41. Has funding been secured for publication and distribution of EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures, etc.)?	X		
42. Is there a central fund or other mechanism for funding supplies, equipment and services necessary to provide disability accommodations?	X		
43. Does EPA fund major renovation projects to ensure timely compliance with Uniform Federal Accessibility Standards?	X		
44. Is the EEO Program allocated sufficient resources to train all employees on EEO Programs, including administrative and judicial remedial procedures available to employees?	X		
45. Is there sufficient funding to ensure the prominent posting of written materials in all personnel and EEO offices? [see 29 C.F.R. § 1614.102(b)(5)]	X		
46. Is there sufficient funding to ensure that all employees have access to this training and information?	X		
47. Is there sufficient funding to provide all managers and supervisors with training and periodic up-dates on their EEO responsibilities:	X		

48. for ensuring a workplace that is free from all forms of discrimination, including harassment and retaliation?	X		
49. to provide religious accommodations?	X		
50. to provide disability accommodations in accordance with EPA's written procedures?	X		
51. in the EEO discrimination complaint process?	X		
52. to participate in ADR?	X		

**Essential Element C: Management and Program Accountability**

This element requires EPA Head to hold all managers, supervisors, and EEO Officials responsible for the effective implementation of EPA's EEO Program and Plan.

EEOC MD 715 Agency Assessment Questions	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to EPA's status report
	Yes	No	
Compliance Indicator: EEO program officials advise and provide appropriate assistance to managers/supervisors about the status of EEO programs within each manager's or supervisor's area or responsibility.			
53. Are regular (monthly/quarterly/semi-annually) EEO updates provided to management/supervisory officials by EEO program officials?	X		
54. Do EEO program officials coordinate the development and implementation of EEO Plans with all appropriate agency managers to include Agency Counsel, Human Resource Officials, Finance, and the Chief information Officer?	X		
Compliance Indicator: The Human Resources Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures are in conformity with instructions contained in EEOC management directives. [see 29 CFR § 1614.102(b)(3)]			
55. Have time-tables or schedules been established for EPA to review its Merit Promotion Program Policy and Procedures for systemic barriers that may be impeding full participation in promotion opportunities by all groups?	X		
56. Have time-tables or schedules been established for EPA to review its Employee Recognition Awards Program and Procedures for systemic barriers that may be impeding full participation in the program by all groups?	X		
57. Have time-tables or schedules been established for EPA to review its Employee Development/Training Programs for systemic barriers that may be impeding full participation in training opportunities by all groups?	X		

Compliance Indicator: When findings of discrimination are made, EPA explores whether or not disciplinary actions should be taken.			
58. Does EPA have a disciplinary policy and/or a table of penalties that covers employees found to have committed discrimination?	X		
59. Have all employees, supervisors, and managers been informed as to the penalties for being found to perpetrate discriminatory behavior or for taking personnel actions based upon a prohibited basis?	X		
60. Has EPA, when appropriate, disciplined or sanctioned managers/supervisors or employees found to have discriminated over the past two years?	X		
If so, cite number found to have discriminated and list penalty/disciplinary action for each type of violation. Response: There was one finding of discrimination during this time period, and as of the date of this report, management is considering appropriate disciplinary action in accordance with EPA's Table of Penalties; however, no final decision have yet been made.			
61. Does EPA promptly (within the established time frame) comply with EEOC, Merit Systems Protection Board, Federal Labor Relations Authority, labor arbitrators, and District Court orders?	X		
62. Does EPA review disability accommodation decisions/actions to ensure compliance with its written procedures and analyze the information tracked for trends, problems, etc.?	X		

**Essential Element D: Proactive Prevention**

Requires that EPA head makes early efforts to prevent discriminatory actions and eliminate barriers to equal employment opportunity in the workplace.

EEOC MD 715 Agency Assessment Questions	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to EPA's status report
	Yes	No	
Compliance Indicator: Analyses to identify and remove unnecessary barriers to employment are conducted throughout the year.			
63. Do senior managers meet with and assist the EEO Director and/or other EEO Program Officials in the identification of barriers that may be impeding the realization of equal employment opportunity?	X		
64. When barriers are identified, do senior managers develop and implement, with the assistance of EPA EEO office, agency EEO Action Plans to eliminate said barriers?	X		
65. Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans?	X		
66. Are trend analyses of workforce profiles conducted by race, national origin, sex and disability?	X		
67. Are trend analyses of the workforce's major occupations conducted by race, national origin, sex and disability?	X		
68. Are trends analyses of the workforce's grade level distribution conducted by race, national origin, sex and disability?	X		
69. Are trend analyses of the workforce's compensation and reward system conducted by race, national origin, sex and disability?	X		

70. Are trend analyses of the effects of management/personnel policies, procedures and practices conducted by race, national origin, sex and disability?	X		
Compliance Indicator: The use of Alternative Dispute Resolution (ADR) is encouraged by senior management.			
71. Are all employees encouraged to use ADR?	X		
72. Is the participation of supervisors and managers in the ADR process required?	X		

**Essential Element E: Efficiency**

Requires that EPA head ensure that there are effective systems in place for evaluating the impact and effectiveness of EPA's EEO Programs as well as an efficient and fair dispute resolution process.

EEOC MD 715 Agency Assessment Questions	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to EPA's status report
	Yes	No	
Compliance Indicator: EPA has sufficient staffing, funding, and authority to achieve the elimination of identified barriers.			
73. Does the EEO Office employ personnel with adequate training and experience to conduct the analyses required by MD-715 and these instructions?		X	Please see Part H-1.
74. Has EPA implemented an adequate data collection and analysis systems that permit tracking of the information required by MD-715 and these instructions?	X		
75. Have sufficient resources been provided to conduct effective audits of field facilities' efforts to achieve a model EEO program and eliminate discrimination under Title VII and the Rehabilitation Act?	X		
76. Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations in all major components of EPA?	X		
77. Are 90% of accommodation requests processed within the time frame set forth in EPA procedures for reasonable accommodation?	X		
Compliance Indicator: EPA has an effective complaint tracking and monitoring system in place to increase the effectiveness of EPA's EEO Programs.			

78. Does EPA use a complaint tracking and monitoring system that allows identification of the location and status of complaints and length of time elapsed at each stage of EPA's complaint resolution process?	X		
79. Does EPA's tracking system identify the issues and bases of the complaints, the aggrieved individuals/complainants, the involved management officials and other information to analyze complaint activity and trends?	X		
80. Does EPA hold contractors accountable for delay in counseling and investigation processing times?	X		
If yes, briefly describe how: In the event of a delay, contract payment is reduced or the contract is not renewed.			
81. Does EPA monitor and ensure that new investigators, counselors, including contract and collateral duty investigators, receive the 32 hours of training required in accordance with EEO Management Directive MD-110?	X		
82. Does EPA monitor and ensure that experienced counselors, investigators, including contract and collateral duty investigators, receive the 8 hours of refresher training required on an annual basis in accordance with EEO Management Directive MD-110?	X		
Compliance Indicator: EPA has sufficient staffing, funding and authority to comply with the time frames in accordance with the EEOC (29 C.F.R. Part 1614) regulations for processing EEO complaints of employment discrimination.			
83. Are benchmarks in place that compares EPA's discrimination complaint processes with 29 C.F.R. Part 1614?	X		
84. Does EPA provide timely EEO counseling within 30 days of the initial request or within an agreed upon extension in writing, up to 60 days?	X		

85. Does EPA provide an aggrieved person with written notification of his/her rights and responsibilities in the EEO process in a timely fashion?	X		
86. Does EPA complete the investigations within the applicable prescribed time frame?	X		Please see Part H-2.
87. When a complainant requests a final agency decision, does EPA issue the decision within 60 days of the request?		X	Please see Part H-2.
88. When a complainant requests a hearing, does EPA immediately upon receipt of the request from the EEOC AJ forward the investigative file to the EEOC Hearing Office?	X		
89. When a settlement agreement is entered into, does EPA timely complete any obligations provided for in such agreements?	X		
90. Does EPA ensure timely compliance with EEOC AJ decisions which are not the subject of an appeal by EPA?	X		
Compliance Indicator: There is an efficient and fair dispute resolution process and effective systems for evaluating the impact and effectiveness of EPA's EEO complaint processing program.			
91. In accordance with 29 C.F.R. §1614.102(b), has EPA established an ADR Program during the pre-complaint and formal complaint stages of the EEO process?	X		
92. Does EPA require all managers and supervisors to receive ADR training in accordance with EEOC (29 C.F.R. Part 1614) regulations, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR?	X		
93. After EPA has offered ADR and the complainant has elected to participate in ADR, are the managers required to participate?	X		

94. Does the responsible management official directly involved in the dispute have settlement authority?	X		
Compliance Indicator: EPA has effective systems in place for maintaining and evaluating the impact and effectiveness of its EEO programs.			
95. Does EPA have a system of management controls in place to ensure the timely, accurate, complete and consistent reporting of EEO complaint data to the EEOC?	X		
96. Does EPA provide reasonable resources for the EEO complaint process to ensure efficient and successful operation in accordance with 29 C.F.R. § 1614.102(a)(1)?	X		
97. Does EPA EEO office have management controls in place to monitor and ensure that the data received from Human Resources is accurate, timely received, and contains all the required data elements for submitting annual reports to the EEOC?	X		
98. Do EPA's EEO programs address all of the laws enforced by the EEOC?	X		
99. Does EPA identify and monitor significant trends in complaint processing to determine whether EPA is meeting its obligations under Title VII and the Rehabilitation Act?	X		
100. Does EPA track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD-715 standards?		X	Please see Part H-3.
101. Does EPA consult with other agencies of similar size on the effectiveness of their EEO programs to identify best practices and share ideas?	X		
Compliance Indicator: EPA ensures that the investigation and adjudication function of its complaint resolution process are separate from its legal defense arm of agency or other offices with conflicting or competing interests.			

102. Are legal sufficiency reviews of EEO matters handled by a functional unit that is separate and apart from the unit which handles agency representation in EEO complaints?	X		
103. Does EPA discrimination complaint process ensure a neutral adjudication function?	X		
104. If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints?	X		Please see Part H-2.

**Essential Element F: Responsiveness and Legal Compliance**

This element requires that federal agencies are in full compliance with EEO statutes and EEOC regulations, policy guidance, and other written instructions.

EEOC MD 715 Agency Assessment Questions	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to EPA's status report
	Yes	No	
Compliance Indicator: Agency personnel are accountable for timely compliance with orders issued by EEOC Administrative Judges.			
105. Does EPA have a system of management control to ensure that agency officials timely comply with any orders or directives issued by EEOC Administrative Judges?	X		
Compliance Indicator: EPA's system of management controls ensures that EPA timely completes all ordered corrective action and submits its compliance report to EEOC within 30 days of such completion.			
106. Does EPA have control over the payroll processing function of EPA? If Yes, answer the two questions below.	X		
107. Are there steps in place to guarantee responsive, timely, and predictable processing of ordered monetary relief?	X		
108. Are procedures in place to promptly process other forms of ordered relief?	X		
Compliance Indicator: Agency personnel are accountable for the timely completion of actions required to comply with orders of EEOC.			
109. Is compliance with EEOC orders encompassed in the performance standards of any agency employees?	X		
If so, please identify the employees by title in the comments section, and state how performance is measured. Compliance is specifically included in performance standards of the Assistant Director of the Employment Complaints Resolutions Division. The position is currently vacant due to the retirement of the previous Assistant Director. The vacancy has been announced and a selection is expected shortly.			

110. Is the unit charged with the responsibility for compliance with EEOC orders located in the EEO office?	X		
If not, please identify the unit in which it is located, the number of employees in the unit, and their grade levels in the comments section. N/A			
111. Have the involved employees received any formal training in EEO compliance?	X		
Does EPA promptly provide to the EEOC the following documentation for completing compliance:			
112. Attorney Fees: Copy of check issued for attorney fees and /or a narrative statement by an appropriate agency official, or agency payment order dating the dollar amount of attorney fees paid?	X		
113. Awards: A narrative statement by an appropriate agency official stating the dollar amount and the criteria used to calculate the award?	X		
114. Back Pay and Interest: Computer print-outs or payroll documents outlining gross back pay and interest, copy of any checks issued, narrative statement by an appropriate agency official of total monies paid?	X		
115. Compensatory Damages: The final agency decision and evidence of payment, if made?	X		
116. Training: Attendance roster at training session(s) or a narrative statement by an appropriate agency official confirming that specific persons or groups of persons attended training on a date certain?	X		
117. Personnel Actions (e.g., Reinstatement, Promotion, Hiring, Reassignment): Copies of SF-50s	X		
118. Posting of Notice of Violation: Original signed and dated notice reflecting the dates that the notice was posted. A copy of the notice will suffice if the original is not available.	X		

119. Supplemental Investigation: 1. Copy of letter to complainant acknowledging receipt from EEOC of remanded case. 2. Copy of letter to complainant transmitting the Report of Investigation (not the ROI itself unless specified). 3. Copy of request for a hearing (complainant's request or agency's transmittal letter).	X		
120. Final Agency Decision (FAD): FAD or copy of the complainant's request for a hearing.	X		
121. Restoration of Leave: Print-out or statement identifying the amount of leave restored, if applicable. If not, an explanation or statement.	X		
122. Civil Actions: A complete copy of the civil action complaint demonstrating same issues raised as in compliance matter.	X		
123. Settlement Agreements: Signed and dated agreement with specific dollar amounts, if applicable. Also, appropriate documentation of relief is provided.	X		

<u>Part H Plan to Correct Deficiencies</u>	
<b>Part H-1: EEO Staff and MD 715</b>	
STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	(Part G: Q-73) Does the EEO Office employ personnel with adequate training and experience to conduct the analyses required by MD 715 and these instructions? No.
OBJECTIVE:	To further improve the training and skills of EEO personnel in the Office of Civil Rights and in the Regions to enable them to administer all aspects of the EEO process.
RESPONSIBLE OFFICIAL:	Director of the Office of Civil Rights
DATE OBJECTIVE INITIATED:	September 1, 2010
TARGET DATE FOR COMPLETION OF OBJECTIVE:	December 12, 2013
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
Conduct MD 715 Barrier Analysis Training for Affirmative Employment Analysis and Accountability division and MD-715 stakeholders.	<b>Completed December 2013</b>

Assistant Director for Affirmative Employment Analysis and Accountability division appointed.	<b>Completed May 2015</b>
Provide Affirmative Employment, Analysis and Accountability staff with additional on-the-job experiences to conduct MD 715 Barrier Analysis for Region and Assistant Administratorship Technical Assistance Visits.	September 2015
<b>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:</b>	
<p>(Part G: Q-73) In FY 2014, the Office of Civil Rights prioritized training and building the capacity of Affirmative Employment, Analysis and Accountability staff to complete the analysis required by MD 715. From December 9 to December 12, 2013, the Office of Civil Rights senior leadership and the Affirmative Employment Analysis and Accountability team attended training facilitated by the Defense Equal Opportunity Management Institute. In addition, the Affirmative Employment Analysis and Accountability team has received on-the-job training to improve their understanding of the MD-715 Report from their Assistant Director since her appointment. Nonetheless, the Affirmative Employment, Analysis and Accountability staff will be given additional experience to conduct the analyses required by MD-715 in a further attempt to improve their capacity to independently perform the analysis required by MD 715. At this time, the Office of Civil Rights relied on the skills and experience of the Assistant Director of the Affirmative Employment Analysis and Accountability and a staff-level employee on detail from the Office of General Counsel to complete the FY 2014 MD-715 Report.</p>	

### Part H-2: Timeliness and Effectiveness of EEO Complaints Processing Program

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	<p>(Part G: Q-86) Does EPA complete the investigations within the applicable prescribed time frame? Yes.</p> <p>(Part G: Q-87) When a complainant requests a Final Agency Decision, does EPA issue the decision within 60 days of the request? No.</p> <p>(Part G: Q-104) If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? Yes.</p>	
OBJECTIVE:	<p>To ensure that EEO investigations and Final Agency Decisions are consistently completed within the timeframes prescribed by EEOC MD 110 and 29 C.F.R. Part 1614.</p> <p>To ensure that legal counsel is given adequate time to conduct sufficiency reviews while still meeting regulatory timeframes.</p>	
RESPONSIBLE OFFICIAL:	Director of the Office of Civil Rights Assistant Director of the Office of Civil Rights, Employment Complaints Resolutions Division	
DATE OBJECTIVE INITIATED:	March 1, 2011	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	March 31, 2015	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)	
Evaluate all management techniques to increase efficiency, including the hiring of a staff Attorney-Advisor, GS-0905.	<b>March 2015</b>	

**REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:**

(Part G: Q-86) In FY 2014, all investigations were completed within the applicable prescribed time frame. Since FY 2012, the Office of Civil Rights has taken several steps to ensure that investigations are completed in a timely manner. In particular, the Employment Complaint Resolutions Staff attended two days of in-depth training regarding best practices for researching and writing letters of acceptance/dismissal; the Office of Civil Rights worked with USPS to refine the investigation process; ECRS staff converted all active cases to the iComplaints system; and OCR overhauled its EEO Counselor training program.

(PART G: Q-87) During FY 2014, the Office of Civil Rights continued to eliminate a backlog of Final Agency Decisions. The Office of Civil Rights' processing times for Final Agency Decisions was negatively impacted when the Employment Complaints Resolutions Division lost an Attorney-Adviser. Staffing for this position will be a priority to ensure timely processing in FY 2015.

(Part G: Q-104) Legal counsel's sufficiency review is incorporated into the processing timeframes. The Office of Civil Rights has implemented a comprehensive Standard Operating Procedure outlining complaint procedures, which incorporates the legal review, to ensure that complaints are thoroughly investigated and the Final Agency Decisions are well-written in a timely manner.

Part H-3: Tracking and Analysis of Recruitment Efforts	
STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	(Part G: Q-100) Does EPA track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD 715 standards? No.
OBJECTIVE:	To create a mechanism for proactive information exchanged among EPA’s national recruitment program staff, selecting officials, organizational program management/regional human resources staff, and leadership in the Human Resources Shared Service Centers to shape recruitment efforts in their early stages and help reduce barriers. The desired goal is to have a broad-based recruitment strategy that includes focus recruitment efforts to enhance diversity in the applicant pools.
RESPONSIBLE OFFICIAL:	Acting Assistant Administrator of Office of Administration & Resources Management Director of the Office of Civil Rights Director of the Office of Diversity, Advisory Committee Management and Outreach Director of the Office of Human Resources Deputy Civil Rights Officials
DATE OBJECTIVE INITIATED:	November 1, 2013

TARGET DATE FOR COMPLETION OF OBJECTIVE:	March 30, 2018	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:		TARGET DATE (Must be specific)
Support a “One Great Place to Work Initiative” committing EPA to foster a work environment that nurtures and advances the talents, drive, and interests of all employees. This campaign is built around three		<b>Completed September 2014</b>

<p>principal areas: Supportive Work Environments, Professional Development, and Benefits and Amenities.</p>	
<p>The Office of Human Resources will develop, in coordination with the Office of Diversity, Advisory Committee Management and Outreach and the Office of Civil Right, a strategic recruitment plan and guidance document, which will be disseminated to all supervisors in EPA.</p>	<p><b>Completed September 2014</b></p>
<p>The Office of Human Resources will update the guidebook on hiring flexibilities and authorities and ensure that the updated information is broadly distributed to EPA selecting officials.</p>	<p><b>Completed October 2014</b></p>
<p>The Office of Diversity, Advisory Committee Management and Outreach will collaborate with the Office of Human Resources to create a tool to track centrally coordinated recruitment activities.</p>	<p>June 2015</p>
<p>The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to develop a hiring survey to examine the hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified.</p>	<p>September 2015</p>
<p>The Office of Human Resources will coordinate and collaborate with the Office of Civil Rights to evaluate the data from the Management Hiring Satisfaction Survey to determine whether there are any procedural barriers associated with the development of vacancy announcements and outreach efforts.</p>	<p>September 2016</p>
<p>The Office of Civil Rights will collaborate with the Office of Human Resources to evaluate the effectiveness of it strategic recruitment plan and guidance document and make necessary modifications or changes.</p>	<p>September 2016</p>
<p>The Office of Civil Rights will collaborate and coordinate with Regions and Programs/Offices that employ series 0905 Attorneys to develop and implement a process to collect, retain, and analyze applicant flow data for series 0905 Attorney positions.</p>	<p>September 2017</p>
<p><b>REPORT OF ACCOMPLISHMENTS AND MODIFICATIONS TO OBJECTIVE:</b></p>	
<p></p>	

(PART G: Q-100) EPA continues to develop and implement several modifications to this objective to address the triggers highlighted in its workforce data and in furtherance of EPA's effort to track and analyze recruitment efforts and identify any potential barriers to equal employment opportunity and full participation by all groups. In FY 2014, the hiring flexibilities and authorities guidebook was updated, which helped to improve the efficiency of the Agency's recruitment efforts.

By the end of FY 2015, EPA plans to accomplish several planned activities to track recruitment efforts and analyze efforts to identify potential barriers: 1) the creation of a tool or process to track centrally coordinated recruitment activities; 2) the development of a hiring survey to examine the hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified; 3) the creation of a process to collect, retain, and analyze applicant flow data for Series 0905 Attorney positions. Thereafter, in FY 2016, the accomplishment of several key planned activities will further enhance EPA's ability to track recruitment efforts and analyze efforts to identify potential barriers.

<b>Part H-4: Standardize EEO Information Provided to New Employees and New Managers/Supervisors</b>	
STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	(Part G: Q-3) Are new employees provided a copy of the EEO Policy Statement during orientation? No.
OBJECTIVE:	To standardize EEO information provided to new employees and employees promoted into the supervisory ranks.
RESPONSIBLE OFFICIAL:	Director of the Office of Civil Rights Director of the Office of Human Resources Assistant Director of the Office of Civil Rights, Affirmative Employment Analysis and Accountability Program
DATE OBJECTIVE INITIATED:	January 1, 2015
TARGET DATE FOR COMPLETION OF OBJECTIVE:	March 30, 2015
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
The Office of Human Resources will develop an agency wide standard to ensure that paper copy of EEO-related documents are provided in all new employee orientation.	<b>February 2015</b>
The Office of Civil Rights in collaboration with the Office of Human Resources will provide a copy of the Agency's EEO Policy Statement in orientation packages for new employees at all Headquarters, Regional Offices, and Labs.	<b>March 2015</b>
<b>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:</b>	

(Part G: Q-3) Currently, the Agency provides the EEO Policy Statement annually to all employees via email and provides a link where the policy is located on the intranet. However, at EPA Headquarters, Regional Offices, and Labs, the materials disseminated during the new employees orientation varies. To ensure consistency, EPA will implement a process to ensure that all new employees are provided a paper copy of all EEO-related documents, including the EEO Policy Statement. In addition, new employees will be made aware of where they can find EEO-related information on the Agency's intranet.

Part I-1: New Hires	
<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. How was the condition recognized as a potential barrier?</p>	<p>Data comparisons between the Relevant Civilian Labor Force (RCLF), application, qualification, and selection rates in certain major occupations revealed instances of lower than expected application, qualification, and/or selection rates.</p>
<p><b>BARRIER ANALYSIS:</b> Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>EPA reviewed the statistical data associated with new hires (Table A7) for employees in six of its major occupations. In addition, EPA conducted a four-year trend analysis that included FY 2011-2014. Although the exhaustive list of triggers is provided below, certain triggers were highlighted for illustrative purposes but not because they were more important or worse than other triggers.</p> <p>The seven largest occupations include 0028 Environmental Protection Specialist, 0301 Miscellaneous Administration and Program Specialist, 0343 Management/Program Analyst, 0401 General Biological Science (Research), 0819 Environmental Engineer (Research), 0905 General Attorney, and 1301 Physical/Environmental Scientist (Research). Although 0905 General Attorneys constitute one of EPA’s major occupations, data could not be gathered for this occupational series because of the unique characteristics that apply to the selection process associated with excepted service positions. As mentioned in the planned activities noted below, EPA plans to develop a process to collect all data for 0905 General Attorneys in FY 2015.</p> <p><b>Application</b></p> <p>For new hires, EPA identified application rate triggers by comparing the relevant civilian labor force and application rates (Table A7) of the respective populations. For the third year in a row, Black Males, Black Females, Two or more Races Males, and Two or More Races Females have applied for positions at rates well above their representation in the RCLF in every major occupation series.</p>

The triggers associated with the application rates of Hispanic Females decreased in FY 2014 when they applied for positions at rates equal or higher to their representation in the RCLF in all major job occupations, as compared to FY 2013 and FY 2012, where triggers were noted in the 0301 Miscellaneous Administration and Program Specialist occupational series for these race/national origin and sex groups.

The triggers associated with the application rates of White Females decreased in FY 2014, when they applied for positions at rates equal or higher to their representation in the RCLF in three major job occupations: 0028 Environmental Protection Specialist, 0819 Environmental Engineer, and 1301 Physical Scientist/Environmental Scientist, as compared to FY 2013, where triggers were noted in every major occupation except the 0819 Environmental Engineer occupational series.

In contrast, for the past three fiscal years (2012, 2013, and 2014), Asian Males have applied for positions at rates lower than their representation in the RCLF in three major occupations: 0301 Miscellaneous Administration and Program Specialist, 0343 Management/Program Analyst, 1301 Physical Scientist.

From FY 2013 to 2014, the representation of Asian Males in the applicant pool for the 0343 Management/Program Analyst occupational series decreased from 3.00% to 2.70% even though their representation in the RCLF has remained consistent at 5.30%. The triggers associated with the application rates of Native Hawaiian Females, American Indian Males, and American Indian Females increased in FY 2014. For example, in FY 2013, the following application rate triggers were not present: 1) Native Hawaiian Females in the 0301 Misc. Administration and Program Specialist occupational series; 2) American Indian Males in the 0028 Environmental Protection Specialist occupational series; and 3) American Indian Females in the 0301 Misc. Administration and Program Specialist, and 0401 General Biological Science occupational series.

The following chart details the specific race/national origin and sex groups that applied for major occupation positions at rates lower than their representation in the RCLF:

<b>Race, National Origin and Sex</b>	<b>Occupational Series</b>
Hispanic Males	0301
White Males	0028, 0301, 0343, 0401, 0819

White Females	0301, 0343, 0401
Asian Males	0301, 0343, 1301
Asian Females	0301,0343, 0401, 1301, 1301
Native Hawaiian Females	0301, 0819
American Indian Males	0028, 0343, 0819, 1301
American Indian Females	0301, 0343, 0401

In light of these data, EPA will continue to examine whether barriers to equal employment opportunity exist. In particular, EPA will try to determine whether an Agency policy, practice or procedure is causing certain race/national origin and sex groups to apply for major occupation positions at rates that are less than anticipated. EPA has planned a number of activities, which are detailed below, in an attempt to identify a potential cause of the aforementioned triggers. After these planned activities are completed, EPA will evaluate whether they have impacted the triggers noted above.

### **Qualification**

For new hires, EPA identified qualification rate triggers by comparing the application and qualification rates (Table A7) of the respective populations. The triggers associated with the qualification rates of Black Females, White Females, and Native Hawaiian Females identified in FY 2013 were no longer present in FY 2014. Likewise, less qualification rate triggers were identified for White Males, Black Males, American Indian Males, and Two or More Race Females in FY 2014 than in 2013.

On the other hand, for the past four fiscal years (2011, 2012, 2013, and 2014), Hispanic Males have qualified for positions at rates lower than their application rates in five major occupations: 0028 Environmental Protection Specialist, 0301 Miscellaneous Administration and Program Specialist, 0343 Management/Program Analyst, 0401 General Biological Science, and 1301 Physical Scientist. In FY 2014, a qualification rate trigger that Hispanic Males experienced in FY 2012 reappeared: 0819 Environmental Engineer occupational series.

From FY 2013 to 2014, the representation of Hispanic Males in the qualified pool for the 0401 General Biological Science occupational series decreased even though their application rate increased. For instance, from FY 2013 to 2014, the application rates of Hispanic Males for positions in the 0401 General Biological Science occupational series increased from 4.90% to 5.10%, but their qualification rates nevertheless fell from 4.80% to 4.50% during this same period.

Similarly, the triggers associated with the qualification rates of Asian Males and Asian Females increased in FY 2014. In FY 2014, the following qualification rate triggers were present even though they were not identified in FY 2013: 1) Asian Males in the 0028 Environmental Protection Specialist, 0301 Misc. Administration and Program Specialist, and 0401 General Biological Science occupational series; and 2) Asian Females in the 0028 Environmental Protection Specialist, 0401 General Biological Science, and 1301 Physical Scientist occupational series.

The following chart details the specific race/national origin and sex groups that were qualified for major occupation positions at rates lower than their application rates:

<b>Race, National Origin and Sex</b>	<b>Occupational Series</b>
Hispanic Males	0028, 0301, 0343, 0401, 0819, 1301
Hispanic Females	0343
White Males	0028, 0301
Black Males	0028, 0301, 0401, 1301
Asian Males	0028, 0301, 0401
Asian Females	0028, 0401, 1301
Native Hawaiian Males	0343, 0819
American Indian Males	0301, 0343
American Indian Females	0401, 0819
Two or More Race Males	0028, 0819
Two or More Race Females	0301

In light of these data, EPA will continue to examine whether barriers to equal employment opportunity exist. In particular, EPA will try to determine whether an Agency policy or practice is causing certain race/national origin and sex groups to be qualified for major occupation positions at rates that are less than their application rate. EPA has planned a number of activities, which are detailed below, in an attempt to identify a potential cause of the aforementioned triggers. After these planned activities are completed, EPA will evaluate whether they have impacted the triggers noted above.

**Selection**

For new hires, EPA identified selection rate triggers by comparing the qualification and selection rates (Table A7) of the respective populations. The triggers associated with the selection rates of

White Females identified in FY 2013 were no longer present in FY 2014. Moreover, less selection rate triggers were identified for Asian Males, Asian Females, and Two or More Race Females in FY 2014 than in FY 2013.

In contrast, the selection rate triggers of Black Males have increased. For the past four fiscal years (2011, 2012, 2013, and 2014), the selection rates of Black Males has been lower than their qualification rates in four major occupations: 0028 Environmental Protection Specialist, 0301 Miscellaneous Administration and Program Specialist, 0401 General Biological Science, and 0819 Environmental Engineer. In FY 2014, a selection rate trigger that Black Males experienced in FY 2011 and 2012 reappeared: 0343 Management/Program Analyst occupational series. From FY 2013 to 2014, the representation of Black Males in the selection pool for the 0301 Miscellaneous Administration and Program Specialist occupational series decreased from 5.30% to 4.80% even though their qualification rates increased from 8.90% to 11.80%.

The triggers associated with the selection rates of Hispanic Females, White Males, Black Females, and American Indian Males have increased in FY 2014. In FY 2014, the following qualification rate triggers were present even though they were not identified in FY 2013: 1) Hispanic Females in the 0028 Environmental Protection Specialist, 0301 Misc. Administration and Program Specialist, 0401 General Biological Science, and 1301 Physical Scientist occupational series; 2) White Males in the 0028 Environmental Protection Specialist, 0401 General Biological Science, and 1301 Physical Scientist occupational series; and 3) American Indian Males in the 0401 General Biological Science occupational series. Accordingly, in FY 2014, triggers were associated with the selection rates of Hispanic Females, White Males, Black Females, and American Indian Males, which were not present in FY 2013.

The following chart details the specific race/national origin and sex groups that were selected for major occupation positions at rates lower than their qualification rates:

<b>Race, National Origin and Sex</b>	<b>Occupational Series</b>
Hispanic Males	0028, 0301
Hispanic Females	0028, 0401, 1301
White Males	0028, 0301, 0401, 1301
Black Males	0028, 0301, 0343, 0401, 0819
Black Females	0343, 0401, 1301

	<table border="1"> <tr> <td>Asian Males</td> <td>0028, 0401, 0819, 1301</td> </tr> <tr> <td>Asian Females</td> <td>0028, 0401, 0819, 1301</td> </tr> <tr> <td>Native Hawaiian Males</td> <td>0028, 0301, 0401, 0819</td> </tr> <tr> <td>Native Hawaiian Females</td> <td>0028, 0343, 0401</td> </tr> <tr> <td>American Indian Males</td> <td>0028, 0301, 0343, 0401, 0819, 1301</td> </tr> <tr> <td>American Indian Females</td> <td>0028, 0301, 0401, 0819, 1301</td> </tr> <tr> <td>Two or More Race Males</td> <td>0301, 0343, 0401, 1301</td> </tr> <tr> <td>Two or More Race Females</td> <td>0301, 0343, 0401</td> </tr> </table> <p>In light of these data, EPA will continue to examine whether barriers to equal employment opportunity exist. In particular, EPA will try to determine whether an Agency policy or practice is causing certain race/national origin and sex groups selected for major occupation positions at rates that are less than their qualification rate. EPA has planned a number of activities, which are detailed below, in an attempt to identify a potential cause of the aforementioned triggers. After these planned activities are completed, EPA will evaluate whether they have impacted the triggers noted above.</p>	Asian Males	0028, 0401, 0819, 1301	Asian Females	0028, 0401, 0819, 1301	Native Hawaiian Males	0028, 0301, 0401, 0819	Native Hawaiian Females	0028, 0343, 0401	American Indian Males	0028, 0301, 0343, 0401, 0819, 1301	American Indian Females	0028, 0301, 0401, 0819, 1301	Two or More Race Males	0301, 0343, 0401, 1301	Two or More Race Females	0301, 0343, 0401
Asian Males	0028, 0401, 0819, 1301																
Asian Females	0028, 0401, 0819, 1301																
Native Hawaiian Males	0028, 0301, 0401, 0819																
Native Hawaiian Females	0028, 0343, 0401																
American Indian Males	0028, 0301, 0343, 0401, 0819, 1301																
American Indian Females	0028, 0301, 0401, 0819, 1301																
Two or More Race Males	0301, 0343, 0401, 1301																
Two or More Race Females	0301, 0343, 0401																
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b> Provide a succinct statement of EPA policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>At this time, EPA continues to investigate whether any specific policy, practice, or procedure is causing any of the identified lower than expected participation rates. In FY 2014, EPA implemented the following planned activities to determine what may have caused the less than anticipated application, qualification, and selection rates: 1) a strategic recruitment plan and guidance document, which will be disseminated to all supervisors in EPA; 2) fostering a work environment that nurtures and advances the talents, drive, and interests of all employees; and 3) updating the guidebook on hiring flexibilities and authorities.</p> <p>Nonetheless, EPA’s application, qualification, and selection rates suggest that it should closely examine: 1) its outreach and recruitment policies, practices and procedures for the 0301 Misc. Administration and Program Specialist occupational series to determine whether any Agency policy, practice or procedure is causing certain race/national origin and sex groups not to apply; 2) its qualification policies and practices for the 0028 Environmental Protection Specialist, 0301 Misc. Administration and Program Specialist occupational series to determine whether any Agency policy, practice or procedure is causing certain race/national origin and sex groups not to be found qualified for these positions; and 3) its selection policies and practices for the 0028 Environmental Protection Specialist and 0401 General Biological Science occupational series to determine whether any Agency policy,</p>																

	practice or procedure is causing certain race/national origin and sex groups not to be selected for positions.
OBJECTIVE: State the alternative or revised Agency policy, procedure or practice to be implemented to correct the undesired condition.	EPA will continue its analysis of the hiring process, including recruitment, qualification and selection, associated with the above-identified lower than expected participation rates for several occupational series.
RESPONSIBLE OFFICIALS:	Acting Assistant Administrator of the Office of Administration & Resources Management Director of the Office of Civil Rights Director of the Office of Diversity, Advisory Committee Management and Outreach Director of the Office of Human Resources Deputy Civil Rights Officials
DATE OBJECTIVE INITIATED:	February 15, 2011
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2017
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
The Office of Human Resources will develop, in coordination with the Office of Diversity, Advisory Committee Management and Outreach and the Office of Civil Right, a strategic recruitment plan and guidance document, which will be disseminated to all supervisors in EPA.	<b>Completed September 2014</b>
Support a “One Great Place to Work Initiative” committing EPA to foster a work environment that nurtures and advances the talents, drive, and interests of all employees. This campaign is built around three principal areas: Supportive Work Environments, Professional Development, and Benefits and Amenities.	<b>Completed September 2014</b>
The Office of Human Resources will update the guidebook on hiring flexibilities and authorities and ensure that the updated information is broadly distributed to EPA selecting officials.	<b>Completed October 2014</b>

<p>The Office of Diversity, Advisory Committee Management and Outreach will collaborate with the Office of Human Resources to create a tool to track centrally coordinated recruitment activities.</p>	<p>June 2015</p>
<p>The Office of Administration and Resources Management will provide Agency-wide SEPM training to enhance diversity, inclusion and equal employment opportunities.</p>	<p>September 2015</p>
<p>The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to develop a hiring survey to examine the hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified.</p>	<p>September 2015</p>
<p>The Office of Diversity, Advisory Committee Management and Outreach will incorporate relevant civilian labor force into the Diversity Dashboard to increase the utilization of the Diversity Dashboard in developing and monitoring the effectiveness of targeted outreach strategies.</p>	<p>September 2015</p>
<p>The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to assess whether position descriptions accurately reflect the job duties of major occupations where lower than anticipated application, qualification, and selection rates are identified.</p>	<p>September 2016</p>
<p>The Office of Human Resources will coordinate and collaborate with the Office of Civil Rights to evaluate the data from the Management Hiring Satisfaction Survey to determine whether there are any procedural barriers associated with the development of vacancy announcements and outreach efforts.</p>	<p>September 2016</p>
<p>The Office of Civil Rights will collaborate with the Office of Human Resources to evaluate the effectiveness of its strategic recruitment plan and guidance document and make necessary modifications or changes.</p>	<p>September 2016</p>
<p>The Office of Civil Rights will collaborate and coordinate with Regions and Programs/Offices that employ series 0905 Attorneys to develop and implement a process to collect, retain, and analyze applicant flow data for series 0905 Attorney positions.</p>	<p>September 2017</p>

**Report of Accomplishments and Modifications to Objective**

EPA is pleased to report some changes in the application, qualification, and selection rates of certain race/national origin and sex groups were accomplished. In particular, the triggers associated with the application rates of Hispanic Females; qualification rates of Black Females, White Females, and Native Hawaiian Females; and selection rates of White Females diminished in FY 2014.

In FY 2014, the Agency issued its FY 2014-2018 Strategic Mission, which prioritized the attraction of employees with diverse backgrounds and perspectives, who are positioned to effectively accomplish the Agency's mission and meet evolving environmental and sustainability challenges.

In addition, the Agency established several outreach and recruitment processes that aim to ensure that it reaches all segments of society. In particular, the Agency: 1) issued internal and external guidance on Minority Academic Institution partnerships; 2) analyzed the Agency's FY 2013 Minority Academic Institution support and set a target goal for FY 2014 MAI support; and 3) disseminated its job announcements to all entities included on its recruitment source list and external stakeholders in accordance with the Standard Operating Procedure developed in FY 2013.

In addition, there are several examples of Region and Program/Offices undertaking initiatives designed to explore whether any agency action may have caused the previously identified triggers. The Region 7 EEO Officer and Office of Regional Counsel partnered with the headquarters Office of Human Resources and Public Affairs to review its recruitment and outreach strategy. The updated strategy utilizes social media to facilitate outreach activities prior to the job's announcement. The Office of Acquisition published a *Management Hiring Flexibilities and Authorities Guide*, which provides information about laws and authorities to ensure equal employment opportunity in hiring and other employment decisions.

## PART I-2: Internal Competitive Promotions

<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. How was the condition recognized as a potential barrier?</p>	<p>Data comparisons between the application, qualification, and selection rates for internal competitive promotions in some major occupations revealed instances of lower than expected application, qualification, and/or selection rates.</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>EPA reviewed the statistical data associated with internal promotions (Table A9) for employees in six of EPA’s major occupations and the participation rates for major occupations - distribution by race/ethnicity and sex (Table A6), which is a proxy for the relevant application pool rate and is used for purposes of this report only. In addition, EPA conducted a four-year trend analysis that includes FY 2011-2014. Although the exhaustive list of triggers is provided in each personnel transaction section, certain triggers were highlighted for illustrative purposes, not because they were more important or worse than other triggers.</p> <p>The seven largest occupations include 0028 Environmental Protection Specialist, 0301 Miscellaneous Administration and Program Specialist, 0343 Management/Program Analyst, 0401 General Biological Science (Research), 0819 Environmental Engineer (Research), 0905 General Attorney, and 1301 Physical/Environmental Scientist (Research). Although 0905 General Attorneys constitute one of EPA’s major occupations, data could not be completely gathered for this occupational series for the reasons stated above.</p> <p><b>Application</b></p> <p>For internal competitive promotions, EPA identified application rate triggers by comparing the participation rates of groups in major occupations by race, national origin, and sex (Table A6) and application rates of the respective populations (Table A9). EPA recognizes that not every person in a major occupation may actually apply for an internal competitive promotion, but EPA elected to use this as a proxy for the application rate, for purposes of this report only.</p>

In FY 2014, the application rates of Native Hawaiian Males was greater than their relevant applicant pool rates in all major occupations as compared to FY 2013, when they had application rate triggers in two major occupations: 0301 Miscellaneous Administration and Program Specialist, and 0401 General Biological Science. Similarly, triggers associated with the application rates of Black Females decreased from FY 2013 to FY 2014.

However, the application rates of Hispanic Females, White Males, Black Males, American Indian Males, and Two or More Race Males have not improved. Specifically, the application rates of Hispanic Females, White Males, Black Males, American Indian Males, and Two or More Race Males were lower than their relevant applicant pool rates in more major occupations than in FY 2013. For instance, in FY 2014, Hispanic Females had application rate triggers in 3 major occupations as compared to FY 2013, when triggers were identified in 1 major occupation series: 1301 Physical Scientist.

For the past three fiscal years (2012, 2013, 2014), the application rates of White Females was lower than their representation in the relevant applicant pool in 5 major occupations: 0028 Environmental Protection Specialist, 0301 Miscellaneous Administration and Program Specialist, 0343 Management/Program Analyst, 0401 General Biological Science, and 1301 Physical Scientist.

The following chart details the specific race/national origin and sex groups that applied for internal promotions at rates lower than their representation in the relevant occupations:

<b>Race, National Origin and Sex</b>	<b>Occupational Series</b>
Hispanic Males	0343
Hispanic Females	0301, 0343, 1301
White Males	0301, 0343, 0401
White Females	0028, 0301,0343,0401,1301
Black Males	0343, 0819, 1301
Black Females	0028, 0343
Asian Males	0301, 0343, 1301
Asian Females	0301, 0343, 0401, 1301
Native Hawaiian Females	0028, 0819
American Indian Males	0028, 0401, 1301
American Indian Females	0028, 0343
Two or More Race Males	0343, 1301
Two or More Race Females	1301

In light of these data, EPA will continue to examine whether barriers to equal employment opportunity exist. In particular, EPA will

determine whether an Agency policy, practice or procedure is causing certain race/national origin and sex groups to apply for promotions in major occupations at rates that are less than anticipated. EPA has planned a number of activities, which are detailed below, in an attempt to identify a potential cause of the aforementioned triggers. After these planned activities are completed, EPA will evaluate whether they have impacted the triggers noted above.

**Qualification**

For internal competitive promotions, EPA identified qualification rate triggers by comparing the application and qualification rates (Table A9) of the respective populations. In FY 2014, the qualification rates of Asian Females was higher than their application rates in all major occupations as compared to FY 2013, when they had qualification rate triggers in two major occupations: 0401 General Biological Science, and 1301 Physical Scientist occupational series. Similarly, triggers associated with the qualification rates of Black Females, Asian Males, and Native Hawaiian Males decreased from FY 2013 to FY 2014.

However, the qualification rates of American Indian Males and Two or More Race Males were lower than their application rates in more major occupations than in FY 2013. For instance in FY 2014, the following qualification rate triggers were present even though they were not identified in FY 2013: 0028 Environmental Protection Specialist; 0301 Miscellaneous Administration and Program Specialist; 0401 General Biological Science; 0819 Environmental Engineer.

For the past four fiscal years (2011, 2012, 2013, 2014), the qualification rates of Hispanic Males were lower than their application rates in six major occupations: 0028 Environmental Protection Specialist, 0301 Miscellaneous Administration and Program Specialist, 0343 Management/Program Analyst, 0401 General Biological Science, 0819 Environmental Engineer, and 1301 Physical Scientist.

The following chart details the specific race/national origin and sex groups that are qualified for major occupation positions at rates lower than their application rates:

Race, National Origin and Sex	Occupational Series
Hispanic Males	0028, 0301,0343, 0401, 0819, 1301

Hispanic Females	1301
White Males	0028, 0301,0343, 0819
Black Males	0028, 0301,0343, 0401, 1301
Black Females	0401
Asian Males	0343, 0401
Native Hawaiian Males	0343
Native Hawaiian Females	0301
American Indian Males	0028, 0301, 0401, 0819
American Indian Females	0343, 0819, 1301
Two or More Race Males	0028, 0301,0343, 0401, 0819
Two or More Race Females	0028, 0301,0343, 0401

In light of these data, EPA will continue to examine whether barriers to equal employment opportunity exist. In particular, EPA will determine whether an Agency policy or practice is causing certain race/national origin and sex groups to be deemed qualified for major occupation internal promotions at rates that are less than their application rate. EPA has planned a number of activities, which are detailed below, in an attempt to identify a potential cause of the aforementioned triggers. After these planned activities are completed, EPA will evaluate whether they have impacted the triggers noted above.

### **Selection**

For internal competitive promotions, EPA identified selection rate triggers by comparing the qualification and selection rates (Table A9) of the respective populations. In FY 2014, the selection rates of Native Hawaiian Females was higher than their qualification rates in all major occupations unlike in FY 2013, when they had selection rate triggers in 1 major occupation:

0301 Miscellaneous Administration and Program Specialist.

Specifically, in FY 2014, the selection rates of White Males, White Females, and Asian Females was less than their qualification rates in fewer major occupational series than in FY 2013. In particular, in FY 2014, selection rate triggers associated with Asian Females were present in three major occupations as compared to FY 2013, when they had selection rate triggers in four major occupations: 0028 Environmental Protection Specialist, 0301 Miscellaneous Administration and Program Specialist, 0819 Environmental Engineer, and 1301 Physical Scientist occupational series.

However, the selection rates of Black Males increased. For two fiscal years (2011, 2014), the selection rates of Black Males were lower than their qualification rates in five major occupations: 0028 Environmental Protection Specialist, 0301 Miscellaneous

Administration and Program Specialist, 0343 Management/Program Analyst, 0401 General Biological Science, and 0819 Environmental Engineer. Moreover, the selection rate triggers of Black Males has increased steadily since FY 2012.

The following chart details the specific race/national origin and sex groups that are selected for major occupation positions at rates lower than their qualification rates:

<b>Race, National Origin and Sex</b>	<b>Occupational Series</b>
Hispanic Males	0028, 0819
Hispanic Females	0028, 0343
White Males	0301, 0401
White Females	0301
Black Males	0028, 0301,0343, 0401,0819
Black Females	1301, 0343
Asian Males	0028,0301, 0343, 0819, 1301
Asian Females	0028, 0401, 0343, 1301
Native Hawaiian Males	0028, 0401
American Indian Males	0028, 0401
American Indian Females	0028, 0343, 0401
Two or More Race Males	0028, 0343
Two or More Race Females	0343, 0401

In light of these data, EPA will continue to examine whether barriers to equal employment opportunity exist. In particular, EPA will determine whether an Agency policy or practice is causing certain race/national origin and sex groups to be selected for major occupation internal promotions at rates that are less than their qualification rate. EPA has planned a number of activities, which are detailed below, in an attempt to identify a potential cause of the aforementioned triggers. After these planned activities are completed, EPA will evaluate whether they have impacted the triggers noted above.

**STATEMENT OF IDENTIFIED BARRIER:**

Provide a succinct statement of EPA policy, procedure or practice that has been determined to be the barrier of the undesired condition.

At this time, EPA continues to evaluate whether any specific Agency policy, practice, or procedure is causing any of the identified lower than expected participation rates. In FY 2014, EPA implemented several initiatives to foster a work environment that nurtures and advances the talents, drive, and interests of all employees in an attempt to determine what may have caused the less than anticipated application, qualification, and selection rates.

	<p>Nonetheless, EPA's application, qualification, and selection rates suggest that it should closely examine: 1) its solicitation and career development policies, practices and procedures for the 0343 Management/Program Analyst occupational series to determine whether any agency policy, practice or procedure is causing certain race/national origin and sex groups not to apply; 2) its qualification policies and practices for the 0301 Miscellaneous Administration and Program Specialist, and 0401 General Biological Science occupational series to determine whether any agency policy, practice or procedure is causing certain race/national origin and sex groups not to be found qualified for these positions; and 3) its selection policies and practices for the 0028 Environmental Protection Specialist occupational series to determine whether any agency policy, practice or procedure is causing certain race/national origin and sex groups not to be selected for positions.</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>EPA will continue its analysis of the application, qualification and selection policies and practices associated with the above-identified lower than expected qualification and selection rates for several occupational series.</p>
<p><b>RESPONSIBLE OFFICIAL:</b></p>	<p>Acting Assistant Administrator of the Office of Administration &amp; Resources Management          Director of the Office of Civil Rights          Director of the Office of Diversity, Advisory Committee Management and Outreach          Director of the Office of Human Resources          Deputy Civil Rights Officials</p>
<p><b>DATE OBJECTIVE INITIATED:</b></p>	<p>February 15, 2011</p>
<p><b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b></p>	<p>September 30, 2017</p>
<p><b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b></p>	<p><b>TARGET DATE</b> (Must be specific)</p>

Support a “One Great Place to Work Initiative” committing EPA to foster a work environment that nurtures and advances the talents, drive, and interests of all employees. This campaign is built around three principal areas: Supportive Work Environments, Professional Development, and Benefits and Amenities.	<b>Completed September 2014</b>
The Office of Human Resources will develop, in coordination with the Office of Diversity, Advisory Committee Management and Outreach and the Office of Civil Right, a strategic recruitment plan and guidance document, which will be disseminated to all supervisors in EPA.	<b>Completed September 2014</b>
The Office of Human Resources will update the guidebook on hiring flexibilities and authorities and ensure that the updated information is broadly distributed to EPA selecting officials.	<b>Completed October 2014</b>
The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to develop a hiring satisfaction survey to examine the hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified.	September 2015
The Office of Administration and Resources Management will provide Agency-wide SEPM training to enhance diversity, inclusion and equal employment opportunities.	September 2015
The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to create a tool or process to collect relevant applicant pool data.	September 2015
The Office of Human Resources will coordinate and collaborate with the Office of Civil Rights to evaluate the data from the Management Hiring Satisfaction Survey to determine whether there are any procedural barriers associated with the development of vacancy announcements and outreach efforts.	September 2016
The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to evaluate the effectiveness of	September 2016

it strategic recruitment plan and guidance document and make necessary modifications or changes.	
The Office of Civil Rights will collaborate and coordinate with Regions and Programs/Offices that employ series 0905 Attorneys to develop and implement a process to collect, retain, and analyze applicant flow data for series 0905 Attorney positions.	September 2017
The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to create a tool to assess effectiveness of career development activities.	September 2017

### Report of Accomplishments and Modifications to Objective

EPA is pleased to report that it accomplished some changes in the application, qualification, and selection rates of certain race/national origin and sex groups in FY 2014. In particular, the triggers associated with the application rates of Native Hawaiian Males; the qualification rates of Asian Females; and the selection rates of Native Hawaiian Females diminished in FY 2014.

In FY 2014, the Agency issued its FY 2014-2018 Strategic Mission and implemented an initiative to foster the development of employees and encourage a more engaged work environment. In particular, the Agency: implemented a system to collect baseline data on the use of its Skills Marketplace, a voluntary program to satisfy a number of goals including bolstering employees' overall career development and increase the scope of their knowledge and experience.

In addition, there are several examples of Region and Program/Offices undertaking initiatives designed to explore whether any agency action may have caused the previously identified triggers. For example, the Office of Air and Radiation created a rotational opportunity for staff to fill vacated supervisory positions to support employee development. The Office of General Counsel provided several internal opportunities through its interdivisional opportunities database for employees to acquire and perform different skills and duties, as well as through internal vacancy announcements for employees to temporarily perform team lead and/or managerial functions. The Office of General Counsel also established a workgroup to develop a Details Opportunities Proposal for senior managers' consideration prior to issuance of a Detail Opportunities policy.

In FY 2014, the Office of Chemical Safety and Pollution Prevention funded twenty-five mentee and mentor slots in the program. The Office of Chemical Safety and Pollution Prevention also held a flash mentoring program this year with employees of all levels participating, including the Assistant Administrator. Office of Inspector General offered a lunch and learn session on mentoring opportunities and mentoring resources were also added to their intranet website.

PART I-3: Senior Grades	
<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. How was the condition recognized as a potential barrier?</p>	<p>Data comparisons between the respective feeder pools (one grade below the grade being analyzed), application, qualification, and selection rates revealed instances of lower than expected application, qualification and/or selection rates.</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>EPA reviewed the statistical data associated with Internal Selections for Senior Level Positions (Table A11) and the participation rates for general schedule grades by race/ethnicity and sex (Table A4), which is a proxy for the relevant application pool and is used for purposes of this report only. In addition, EPA conducted a four-year trend analysis that includes FY 2011-2014. Although the exhaustive list of triggers is provided in each personnel transaction section, certain triggers were highlighted for illustrative purposes, not because they were more important or worse than other triggers.</p> <p><b>Application</b></p> <p>For the senior grades, EPA identified application rate triggers by comparing the participation rate of the respective populations at the next lower grade (e.g. the feeder pool for GS 13 Hispanic Females is their overall representation at the GS 12 level) (Table A4) and application rates (Table A11) of the respective populations.</p> <p>The application rates of Asian Males exceeded their representation in the next lowest grade at every senior grade level. In FY 2013, on the other hand, triggers were associated with their application rates at the GS 14 and GS 15 level. Likewise, in FY 2014, no application rate triggers were associated with Hispanic Females as compared to FY 2013, when triggers were identified at the GS 13 level.</p> <p>Moreover, the application rate triggers associated with Black, Asian, Native Hawaiian, and American Indian Females</p>

decreased from FY 2014 to FY 2013. In particular, the application rate of Native Hawaiian and American Indian Females was less than their representation in the next lowest grade in the GS 15 level as compared to FY 2013, when triggers were identified at every senior grade level.

However, the applications rates of Native Hawaiian Males and Two or More Race Females increased. In particular, application rate triggers were identified for Native Hawaiian Males and Two or More Race Females in FY 2014, which were not present in FY 2013. Additionally, for the past three fiscal years (2012, 2013, and 2014), the application rates of White Females was lower than their relevant applicant pool rate at every senior grade level.

The following chart details the specific race/national origin and sex groups that applied for Senior Grade positions at rates lower than their representation in the relevant feeder pool:

<b>Race, National Origin and Sex</b>	<b>Grades</b>
White Males	GS 14
White Females	GS 13, GS 14, GS 15
Black Females	GS 13, GS 14
Asian Females	GS 13, GS 15
Native Hawaiian Males	GS 15
Native Hawaiian Females	GS 15
American Indian Females	GS 15
Two or More Race Females	GS 15

In light of these data, EPA will continue to examine whether barriers to equal employment opportunity exist. In particular, EPA will evaluate whether any Agency policy, practice or procedure is causing certain race/national origin and sex groups to apply for Senior Grade positions at rates that are less than anticipated. EPA has planned a number of activities, which are detailed below, in an attempt to identify a potential cause of the aforementioned triggers. After these planned activities are completed, EPA will evaluate whether they have impacted the triggers noted above.

#### **Qualification**

For the senior grades, EPA identified qualification rate triggers by comparing application and qualification rates (Table A11) of the respective populations. The qualification rates of Black and Native Hawaiian Females exceeded their application rates

at every senior grade level as compared to FY 2013, when triggers were associated with their qualification rates at the GS 14 level. Likewise, qualification rate triggers associated with American Indian Males decreased from FY 2013 to FY 2014. In particular, the qualification rate of American Indian Males went from being less than their application rate at every senior grade level in FY 2013 to only appearing in the GS 14 level in FY 2014.

In contrast, the qualification rates of Native Hawaiian Males and Two or More Race Females increased. For instance, in FY 2014, the qualification rates of Asian Males were lower than their application rates at more senior grade levels as compared to FY 2013, when their triggers were only identified at the GS 13 level. Similarly, White Males had qualification rate triggers at every senior grade level in comparison to FY 2013, when triggers were identified at the GS 13 and 15 levels.

For the past four fiscal years (2011, 2012, 2013, and 2014), the qualification rates of Hispanic Males were lower than their application rates at every senior grade level. Similarly, qualification rate triggers have been associated with Hispanic Females at the GS 14 level over the past three fiscal years (2012, 2013, and 2014). Further, the qualification rates of American Indian and Two or More Race Females was lower than their application rates at the GS 15 and GS 14 level, respectively, even though such triggers were not identified in FY 2013.

The following chart details the specific race/national origin and sex groups that were found qualified at levels below their respective application rates:

<b>Race, National Origin and Sex</b>	<b>Grades</b>
Hispanic Males	GS 13, GS 14, GS 15
Hispanic Females	GS 14
White Males	GS 13, GS 14, GS 15
Black Males	GS 13, GS 14, GS 15
Asian Males	GS 14, GS 15
Native Hawaiian Males	GS 14
American Indian Males	GS 13
American Indian Females	GS 15
Two or More Race Males	GS 14, GS 15
Two or More Race Females	GS 14

In light of these data, EPA will continue to examine whether barriers to equal employment opportunity exist. In particular, EPA will continue evaluating whether an Agency policy practice or procedure is causing certain race/national origin and sex groups to be qualified for Senior Grade positions at rates that are less than anticipated. EPA has planned a number of activities, which are detailed below, in an attempt to identify a potential cause of the aforementioned triggers. After these planned activities are completed, EPA will evaluate whether they have impacted the triggers noted above.

### **Selection**

For the senior grades, EPA identified selection rate triggers by comparing application and qualification rates (Table A11) of the respective populations. EPA experienced a few small successes in the selection rates at the senior grade levels. For instance, selection rate triggers associated with Asian Females, Native Hawaiian Males, and Two or More Race Males and Females decreased from FY 2013 to FY 2014.

In FY 2014, the selection rates of White Males, Black Females, and American Indian Males and Females were lower than their qualification rates at more senior grade levels than in FY 2013. In FY 2014, American Indian Males had selection rate triggers at every senior grade level in comparison to FY 2013, when triggers were identified at the GS 14 and 15 levels. Likewise, Black Females had selection rate triggers at the GS 14 and GS 15 level, as compared to FY 2013, when triggers were identified at the GS 15 level.

However, the applications rates of White Females, Black Males, and White Males have not improved. For the past 3 fiscal years (2012, 2013, and 2014), the selection rates of White Females were lower than their qualification rates at the GS 13 level. Similarly, in FY 2014, selection rate triggers identified in FY 2011 and 2012 for Black Males at the GS 15 level reemerged after disappearing in FY 2013. In addition, the selection rates of White Males was lower than their qualification rates at the GS 15 level, respectively, even though this trigger was not identified in FY 2013.

The following chart details the specific race/national origin and sex groups that were selected at levels below their respective qualification rates:

	<b>Race, National Origin and Sex</b>	<b>Grades</b>
	Hispanic Males	GS 14
	Hispanic Females	GS 14, GS 15
	White Males	GS 15
	White Females	GS 13
	Black Males	GS 13, GS 15
	Black Females	GS 14, GS 15
	Asian Males	GS 13, GS 14
	Asian Females	GS 13, GS 15
	Native Hawaiian Males	GS 13
	Native Hawaiian Females	GS 13
	American Indian Males	GS 13, GS 14, GS 15
	American Indian Females	GS 13, GS 14
	Two or More Race Males	GS 14
	Two or More Race Females	GS 15
	<p>In light of these data, EPA will continue to examine whether barriers to equal employment opportunity exist. In particular, EPA will evaluate whether any Agency policy, practice or procedure is causing certain race/national origin and sex groups to be selected for Senior Grade positions at rates that are less than anticipated. EPA has planned a number of activities, which are detailed below, in an attempt to identify a potential cause of the aforementioned triggers. After these planned activities are completed, EPA will evaluate whether they have impacted the triggers noted above.</p>	
<b>RESPONSIBLE OFFICIAL:</b>	Acting Assistant Administrator of the Office of Administration & Resources Management Director of the Office of Civil Rights Director of the Office of Diversity, Advisory Committee Management and Outreach Director of the Office of Human Resources Deputy Civil Rights Officials	
<b>DATE OBJECTIVE INITIATED:</b>	February 15, 2011	
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	September 30, 2017	

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
Support a “One Great Place to Work Initiative” committing EPA to foster a work environment that nurtures and advances the talents, drive, and interests of all employees. This campaign is built around three principal areas: Supportive Work Environments, Professional Development, and Benefits and Amenities.	<b>Completed September 2014</b>
The Office of Human Resources will develop, in coordination with the Office of Diversity, Advisory Committee Management and Outreach and the Office of Civil Right, a strategic recruitment plan and guidance document, which will be disseminated to all supervisors in EPA.	<b>Completed September 2014</b>
The Office of Human Resources will update the guidebook on hiring flexibilities and authorities and ensure that the updated information is broadly distributed to EPA selecting officials.	<b>Completed October 2014</b>
The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to develop a hiring survey to examine the hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified.	September 2015
The Office of Administration and Resources Management will provide Agency-wide SEPM training to enhance diversity, inclusion and equal employment opportunities.	September 2015
EPA will evaluate the effectiveness of its strategic recruitment plan and guidance document and make necessary modifications or changes.	September 2015
The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to create a tool or process to collect relevant applicant pool data.	September 2015
The Office of Human Resources will coordinate and collaborate with the Office of Civil Rights to evaluate the data from the Management Hiring Satisfaction Survey to determine whether there are any procedural barriers associated with the development of vacancy announcements and outreach efforts.	September 2016

The Office of Civil Rights will collaborate and coordinate with Regions and Programs/Offices that employ series 0905 Attorneys to develop and implement a process to collect, retain, and analyze applicant flow data for series 0905 Attorney positions.	September 2017
The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to create a tool or process to assess effectiveness of career development activities.	September 2017
The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to create a tool or process to evaluate the distribution of awards.	September 2017
<b>Report of Accomplishments and Modifications to Objective</b>	
<p>EPA is pleased to report that it accomplished some improvements in the application, qualification, and selection rates of certain race/national origin and sex groups in FY 2014. In particular, the triggers noted in the application rates of Asian Males, qualification rates of Black and Native Hawaiian Females, and selection rates of Asian Females, Native Hawaiian Males, and Two or More Race Males and Females diminished in FY 2014. EPA believes that these improvements may be the result of its completion of several FY 2014 planned activities.</p> <p>In FY 2014, the Agency issued its FY 2014-2018 Strategic Mission and implemented an initiative to foster the development of employees and encourage a more engaged work environment. In particular, the Agency: implemented a system to collect baseline data on the use of its Skills Marketplace, a voluntary program to satisfy a number of goals including bolstering employees' overall career development and increase the scope of their knowledge and experience.</p> <p>In addition, there are several examples of Region and Program/Offices undertaking initiatives designed to explore whether any agency action may have caused the previously identified triggers. The Region 1 Diversity Steering Committee was convened to study and offer recommendations to expand the diversity of the Region's leadership feeder pool (i.e., staff in grades GS-13 and above). Based on the committee's recommendations, Region 1 plans to offer merit promotion opportunities and developmental opportunities for staff in grades GS-12 and below in FY 2015. The Region 2 Leadership Development Program provided opportunities for leadership development in an array of programs to enhance diversity, and had more than 40 employees participate in the FY 2013/2014 Leadership Development Program.</p> <p>As noted in the internal competitive promotion accomplishments, the Office of Air and Radiation created a rotational opportunity for staff to fill vacated supervisory positions to support employee development. The Office of General Counsel also established a workgroup to develop a Details Opportunities Proposal for senior managers' consideration prior to issuance of a Detail Opportunities policy.</p>	

In FY 2014, the Office of Chemical Safety and Pollution Prevention funded twenty-five mentee and twenty-five mentor slots in the program. The Office of Chemical Safety and Pollution Prevention also held a flash mentoring program this year with employees of all levels participating, including the Assistant Administrator. Office of Inspector General offered a lunch and learn session on mentoring opportunities. Mentoring resources were also added to their intranet website.

PART I-4: Senior Executive Service

**STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:**

Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?

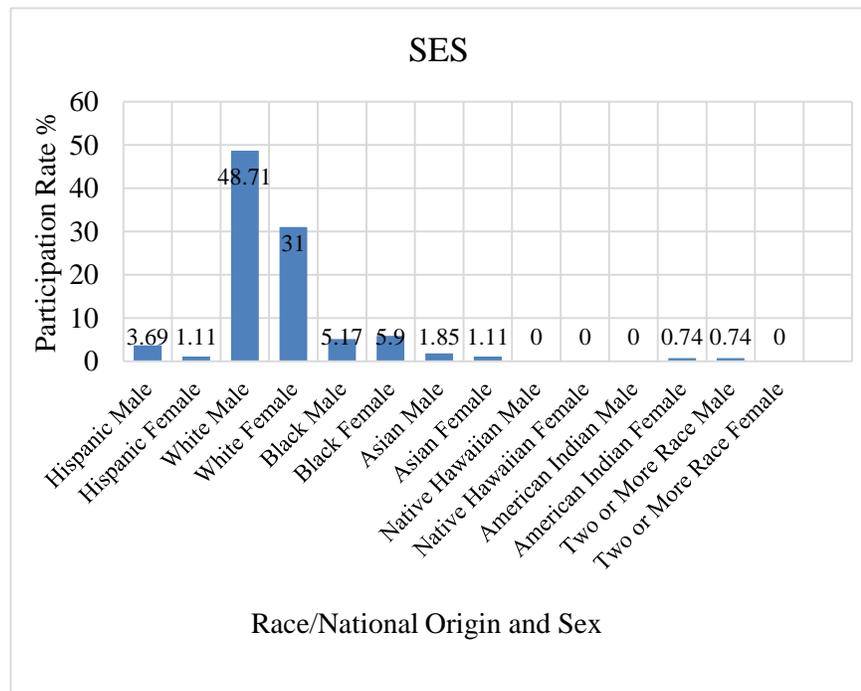
The Agency has not acquired detailed information on internal applicants to SES vacancies to conduct a comprehensive analysis of the Senior Executive Service (SES) workforce.

**BARRIER ANALYSIS:**

Provide a description of the steps taken and data analyzed to determine cause of the condition.

In the 4th quarter of FY 2011, the Executive Resources Division (ERD) successfully launched its first system to collect applicant flow data related to external applicants for SES vacancies. Presently, when selections are made, retrospective analyses of applicant flow data related to determinations on best qualified candidates for the vacancies is conducted and reported.

The Agency collected the workforce participation rates for the SES, which are graphically represented below.



	<p>Although the Agency must collect and analyze detailed information on internal applicants to SES vacancies before it can examine whether barriers to equal employment opportunity exist, the aforementioned workforce data show that certain race/national origin and sex groups are more represented in the current SES workforce.</p> <p>EPA has planned a number of activities to promote our examination of internal SES data, which are detailed below.</p>
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of EPA policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>At this time, it is not possible to identify if there is a specific hiring or promotion process policy, practice, or procedure that may be impacting the representation of any group in the SES. EPA will collect and analyze more detailed information on internal applicants to SES vacancies SES in FY 2016.</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>EPA will work to continue its efforts to enhance its automated data capture capabilities for internal SES hires.</p>
<p><b>RESPONSIBLE OFFICIAL:</b></p>	<p>Acting Assistant Administrator of the Office of Administration &amp; Resources Management  Director of the Office of Civil Rights  Director of the Office of Diversity, Advisory Committee Management and Outreach  Director of the Office of Human Resources  Deputy Civil Rights Officials Deputy Civil Rights Officials</p>
<p><b>DATE OBJECTIVE INITIATED:</b></p>	<p>October 1, 2013</p>

TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2018
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
The Office of Human Resources will develop, in coordination with the Office of Diversity, Advisory Committee Management and Outreach and the Office of Civil Right, a strategic recruitment plan and guidance document, which will be disseminated to all supervisors in EPA.	<b>Completed September 2014</b>
The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to develop a process for collecting and analyzing more detailed information on internal applicants to SES vacancies in accordance with the requirements of MD-715.	September 2015
The Office of Civil Rights will collaborate with Office of Human Resources will collect and analyze more detailed information on internal applicants to SES vacancies in accordance with the requirements of MD-715.	September 2016
The Office of Human Resources will launch a Learning Management System to track Agency employees' participation in career development activities, including trainings, details, and e-learning to determine whether participation in such programs impacts the probability that individuals will apply for and qualify for senior grade positions.	December 2016
The Office of Human Resources will ensure full implementation of the new learning management system.	September 2017
The Office of Human Resources will create a tool or process to assess effectiveness of career development activities in the Learning Management System.	March 2018
<b>Report of Accomplishments and Modifications to Objective</b>	

## PART I-5: Individuals with Targeted Disabilities

<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>Data comparisons between FY 2013 and FY 2014 indicate that even though the EPA workforce decreased by 1097 (5.8%) full/part time temporary and permanent employees, individuals with targeted disabilities increased from 201 (1.20%) to 372 (2.38%) within EPA.</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>EPA completed Part J of this report and noted that the total number of individuals with targeted disabilities in EPA workforce increased from FY 2013 to FY 2014. In particular, the representation of individuals with targeted disabilities in EPA's workforce increased from 201 (1.20%) to 372 (2.38%). Additionally, the total number of full/part time temporary and permanent employees with qualified individuals with a reportable disability increased by 0.73% from FY 2013 to FY 2014.</p>
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of EPA policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>The data suggest that EPA should more closely examine: 1) the uniform use and training on Schedule A and 5 CFR 213.3102(u); and 2) the availability of training programs on Schedule A and 5 CFR 213.3102(u), including topics like the conversion of Schedule A appointees to competitive status when appropriate.</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>EPA will continue its analysis of the retention and selection rates of individuals with targeted disabilities.</p>
<p><b>RESPONSIBLE OFFICIAL:</b></p>	<p>Acting Assistant Administrator of the Office of Administration &amp; Resources Management          Director of the Office of Civil Rights          Director of the Executive Resource Division          Deputy Civil Rights Officials</p>

DATE OBJECTIVE INITIATED:	February 15, 2011
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2016
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
The Office of Diversity, Advisory Committee Management and Outreach will compile a list of disability recruiting sources for Shared Service Centers to send copies of EPA job announcements published on USAJobs.	<b>Completed March 2014</b>
Support a "One Great Place to Work Initiative" committing EPA to foster a work environment that nurtures and advances the talents, drive, and interests of all employees. This campaign is built around three principal areas: Supportive Work Environments, Professional Development, and Benefits and Amenities.	<b>Completed September 2014</b>
The Office of Human Resources will update the exit interview form and process to track the motivation for employees' departure from Agency employment.	September 2015
The Office of Civil Rights will establish a diversity committee to address hiring, advancement, and retention of people with targeted disabilities.	September 2015
The Office of Human Resources and Office of Civil Rights will analyze: 1) the uniform use and training on Schedule A and 5 CFR 213.3102(u); 2) the availability of training programs on Schedule A use and requirement for applicants and managers; and 3) the availability of training programs on the conversion of Schedule A appointees to competitive status, when appropriate.	September 2016
<b>Report of Accomplishments and Modifications to Objective</b>	
In FY 2014, the Office of Civil Rights and Human Resources collaborated to include an employee information form for new employees with disabilities to complete pertaining to	

potential reasonable accommodations requests when onboarding. The Shared Service Centers routinely performed outreach efforts for people with targeted disabilities.

In FY 2014, the National Reasonable Accommodation Coordinator (NRAC) and Assistant Reasonable Accommodation Coordinator (ARAC) provided training, which were attended by approximately 188 managers/supervisors and thirty-six employees. The NRAC conducted a total of thirteen training sessions on EPA's Reasonable Accommodation Policy and Procedures, and Section 508. Furthermore, the Agency continues to hold Senior Executives accountable for fostering diversity for all employees including those individuals with disabilities, pursuant to Executive Order 13548 through their performance appraisal.

In addition, there are several examples of Region and Program/Offices undertaking initiatives designed to explore whether any agency action may have caused the previously identified triggers. In FY 2014, Region 7 developed a Strategy for Employment of Individuals with Disabilities. The purpose is to ensure that job opportunities are reaching applicants with disabilities so that all segments of society have an opportunity to compete for positions. Region 5 published written guidance on the flexibilities of using the Schedule A hiring authority for Persons with Disabilities. In addition, Region 5 managers received Schedule A training in February 2014.

The Region 9 Office of Human Resources assured compliance with panel interview procedures for both internal and external Schedule A hires and reviewed questions for every first round interview. Region 10 conducted individual meetings with supervisors prior to the announcement of positions to determine if: 1) it is conducive to a person with a targeted disability; 2) outreach should be conducted; and 3) Schedule A hiring authority is appropriate.



	TOTAL	Reportable Disability		Targeted Disability		Not Identified		No Disability	
		#	%	#	%	#	%	#	%
6. Employee Recognition and Awards									
6.a. Time-Off Awards (Total hrs. awarded)	46,198	2,817	6.1%	488	1.1%	695	1.5%	42,686	92.39%
6.b. Cash Awards (Total \$\$\$ awarded)	12,826,974	739,888	5.77%	225,821	1.76%	169,458	1.32%	11,917,628	92.91%
6.c. Quality-Step Increase	674	28	4.15%	7	1.04%	14	2.08%	632	93.77%
<b>Part IV</b> Identification and Elimination of Barriers	Please see Form I-5.								
<b>Part V</b> Goals for Targeted Disabilities	<p><b>Hiring Goals</b> – EPA established a goal to reach 2.0% representation in the total workforce for people with targeted disabilities by the end of 2016. In FY 2014, EPA surpassed this goal for the first time. The percentage of people with targeted disabilities at EPA is 2.38%. An agency-wide recertification was conducted through People Plus which allowed employees to self-identify and reclassify their status. In addition, the Office of Personnel Management adjusted the codes used to capture employees with targeted disabilities in accordance with the statutory language of the Americans with Disabilities Act Amendments Act of 2008. To improve the retention and advancement of individuals with targeted disabilities, a diversity committee will be established in FY 2015. In addition, Schedule A and 5 CFR 213.3102(u) training programs will be broadened to include topics such as the conversion of Schedule A appointees to competitive status when appropriate.</p>								

## PART K: Best Practices Summary

EPA considers the following to be noteworthy best practices of our Agency:

- The FY 2014-2018 Strategic Mission, which prioritized the attraction of employees with diverse backgrounds and perspectives, who are positioned to effectively accomplish the Agency's mission and meet evolving environmental and sustainability challenges.
- The Office of Administration and Resources Management disseminated job announcements to all entities included on its recruitment source list, including Minority Academic Institutions, and external stakeholders in accordance with the Standard Operating Procedure developed in FY 2013.
- The Office of Air and Radiation created a rotational opportunity for staff to fill vacated supervisory positions to support employee development.
- The Office of General Counsel provided several internal opportunities through its interdivisional opportunities database for employees to acquire and perform different skills and duties, as well as through internal vacancy announcements for employees to temporarily perform team lead and/or managerial functions.
- The Principal Deputy Assistant Administrator of the Office of Enforcement and Compliance Assurance appointed two senior executives to champion the development and implementation of a training program for OECA managers and supervisors. The subject of the training included EEO laws, regulations, rights, duties and responsibilities to promote best workplace practices.
- The Office of Environmental Information developed and implemented its FY 2014/2015 Talent Management Action Plan to achieve numerous goals, including to ensure that employee development is planned, structured, and systematic—yet flexible to address organizational and individual needs.
- The Office of Chemical Safety and Pollution Prevention funded twenty-five mentee and mentor slots in the program and held a flash mentoring program in FY 2014 with employees of all levels participating, including the Assistant Administrator.
- The Region 1 Diversity Steering Committee was convened to study and offer recommendations to expand the diversity of the Region's leadership feeder pool (i.e., staff in grades GS-13 and above. Based on the committee's recommendations Region 1 plans to offer merit promotion opportunities and developmental opportunities for staff in grades GS-12 and below in FY 2015.

- The Region 2 Leadership Development Program, which provides opportunities for leadership development in an array of programs to enhance diversity, had more than forty employees participate in the FY 2013/2014 LDP.
- The Region 7 EEO Officer and Office of Regional Counsel partnered with the headquarters Office of Human Resources and Public Affairs to review its recruitment and outreach strategy. The updated strategy utilizes social media to facilitate outreach activities prior to the job's announcement.
- The Region 9 Office of Human Resources assured compliance with panel interview procedures for both internal and external Schedule A hires and reviewed questions for every first round interview.
- Region 10 conducted individual meetings with supervisors prior to the announcement of positions to determine if: 1) it is conducive to a person with a targeted disability; 2) outreach should be conducted; and 3) Schedule A hiring authority is appropriate.

Attachments:

- \*Copies of relevant EEO Policy Statements
- \*Copy of Workforce Data Tables as necessary to support Executive Summary and/or EEO Plans
- \*Copy of data from 462 Report as necessary to support action items related to Complaint Processing Program deficiencies, ADR effectiveness, or other compliance issues.
- \*Copy of Facility Accessibility Survey results as necessary to support EEO Action Plan for building renovation projects
- \*Organizational Chart