

United States
Environmental Protection Agency



Management Directive 715 Report

Fiscal Year 2016

Protecting Human Health and the Environment

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EEOC FORM 715-01 PARTS A-D	<i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM EPA STATUS REPORT			
For period covering October 1, 2015 to September 30, 2016				
PART A Department or Agency Identifying Information	1. Agency		1. U.S. Environmental Protection Agency	
	1.a. 2 nd level reporting component		N/A	
	1.b. 3 rd level reporting component		N/A	
	1.c. 4 th level reporting component		N/A	
	2. Address		2. 1200 Pennsylvania Avenue, NW	
	3. City, State, Zip Code		3. Washington, D.C. 20460	
	4. CPDF Code	5. FIPS code(s)	4. EP	5. 11
PART B Total Employment	1. Enter total number of permanent full-time and part-time employees			1. 14,723
	2. Enter total number of temporary employees			2. 1,031
	3. Enter total number employees paid from non-appropriated funds			3. 0
	4. TOTAL EMPLOYMENT [add lines B 1 through 3]			4. 15,754
PART C Agency Official(s) Responsible for Oversight of EEO Program(s)	1. Head of Agency, Official Title		1. Scott Pruitt, Administrator	
	2. Agency Head Designee		2. Mike Flynn, Acting Deputy Administrator	
	3. Principal EEO Director/Official Title/Series/Grade		3. Tanya Lawrence, Acting Director Office of Civil Rights, SES	
	4. Title VII Affirmative EEO Program Official		4. Tina Lancaster, Assistant Director Affirmative Employment, Analysis, and Accountability Staff	
	5. Section 501 Affirmative Action Program Official		5. Christopher Emanuel, National Disability Employment Program Manager	
	6. Title VII EEO Complaint Processing Program Manager		6. Cynthia Darden, Assistant Director for Title VII	
	7. Other Responsible EEO Staff		7. Amanda Sweda, National Reasonable Accommodations Coordinator Kristen Tropp, Assistant Reasonable Accommodations Coordinator Renee Clark, Team Lead, Title VII Mirza P. Baig, EEO Manager Jerome King, EEO Manager Jannette Graves, Program Specialist	

<div data-bbox="354 252 574 348"> EEOC FORM 715-01 PARTS A-D </div>	<div data-bbox="865 252 1380 348"> <i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM EPA STATUS REPORT </div>
<div data-bbox="435 390 516 415"> PART D </div> <div data-bbox="217 436 686 495"> List of Subordinate Components Covered in This Report </div> <div data-bbox="224 558 703 932"> </div>	<div data-bbox="760 401 1446 856"> Headquarters Program Offices in Washington, DC; Research Triangle Park, NC; Cincinnati, OH; Las Vegas, NV Office of the Administrator Office of Administration and Resources Management Office of Air and Radiation Office of the Chief Financial Officer Office of Enforcement and Compliance Assurance Office of General Counsel Office of the Inspector General Office of International and Tribal Affairs Office of Environmental Information Office of Chemical, Safety and Pollution Prevention Office of Research and Development Office of Land and Emergency Management Office of Water </div> <div data-bbox="760 890 1088 1224"> Regional Offices Region 1: Boston, MA Region 2: New York, NY Region 3: Philadelphia, PA Region 4: Atlanta, GA Region 5: Chicago, IL Region 6: Dallas, TX Region 7: Lenexa, KS Region 8: Denver, CO Region 9: San Francisco, CA Region 10: Seattle, WA </div> <div data-bbox="760 1255 1385 1436"> Program Labs: OAR/ORIA/NAREL: Montgomery, AL ORD, NRM Research Lab: Ada, OK ORD/NERL: Athens, GA ORD/NHEER Labs: Narragansett, RI, Gulf Breeze, FL, Duluth, MN, Corvallis, OR </div>

Part E – Executive Summary

Introduction

This Federal Agency Annual Equal Employment Opportunity Program Status Report for Fiscal Year 2016 (FY16) outlines the U.S. Environmental Protection Agency (EPA or Agency) Equal Employment Opportunity (EEO) Program activities, as required by the U.S. Equal Employment Opportunity Commission's (EEOC) Management Directive 715 (MD-715). This report highlights the EPA's accomplishments in establishing and maintaining a model EEO program by promoting equal employment opportunity and identifying areas for improvement for all its employees and applicants. The report also provides planned activities to address any programmatic deficiencies.

The U.S. Environmental Protection Agency

The EPA's mission 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. Fostering a diverse and inclusive workplace through EEO is essential to fulfilling our mission to protect human health and the environment, including our service to the American people.

The Office of Civil Rights

The EPA Office of Civil Rights (OCR) is responsible for carrying out the requirements of the MD-715. In order, to most efficiently and effectively accomplish this duty, OCR maintains several partnerships across the Agency; however, its primary partnership is with the Office of Administration and Resources Management (OARM). This partnership is critical given that OARM is responsible for the effective management of the Agency's human, financial and physical resources, and the data access to employee and applicant race, national origin (RNO), and disability, including the diversity and inclusion¹. Moreover, OCR consults with the Office of General Counsel (OGC) for legal sufficiency review of the Federal Agency Annual EEO Program Status Report.

¹ For purposes of this report, EPA incorporated the Office of Personnel Management (OPM) definition of workforce diversity which stands as a collection of individual attributes that, together, help the Agency pursue organizational objectives efficiently and effectively. These include, but are not limited to, characteristics such as national origin, language, race, color, disability, ethnicity, gender, age, religion, sexual orientation, gender identity, socioeconomic status, veteran status, and family structures. The concept also encompasses differences among people concerning where they are from, where they have lived and their differences of thought and life experiences. OPM further defines inclusion as a set of behaviors (culture) that encourages employees to feel valued for their unique qualities and experience a sense of belonging; and inclusive diversity as a set of behaviors that promote collaboration amongst a diverse group.

Model EEO Program - Essential Elements

In Management Directive 715, six elements serve as the foundation for a model equal employment opportunity program:

- I. Demonstrated commitment from agency leadership;
- II. Integration of equal employment opportunity into the agency's strategic mission;
- III. Management and program accountability;
- IV. Proactive prevention of unlawful discrimination;
- V. Efficiency; and
- VI. Responsiveness and legal compliance

Essential Element I – Demonstrated Commitment from Agency Leadership

- EPAs commitment to equal employment opportunity is presented annually in the *EEO Policy Statement* (April 1, 2016) and *Anti-Harassment Policy Statement* (January 1, 2016) signed by the Administrator.
- In FY 16, the Administrator also signed a new order called the *Transgender and Gender Non-Conforming Employees Order* (June 15, 2016).
- The Office of Human Resources (OHR), along with OCR, ensures EEO related materials are posted and visible throughout EPA Headquarters, Regions, and labs. EPA policies and procedures related to EEO, anti-harassment, and reasonable accommodations are made accessible during new employee orientation and are posted within EPA facilities and on the EPA intranet.
- New employees are required to take EEO related training within their first 90 days of on-boarding. Newly promoted supervisors are provided similar EEO related materials and training during the EPA Successful Leaders Program.
- As a practice, EPA Senior Executives are rated on performance standards that ensure development and promote success of EPA EEO civil rights and diversity and inclusion policies, programs and/or practices, including actions identified within their sub office EEO Program Status Report.
- EPA issued a memo to all supervisors and managers on FY 15 End-Of-Year Performance Management Guidance for General Schedule Employees and Additional Guidance for FY 16. This guidance, made effective in FY 16, revised the previous EEO standard for the general schedule (GS) 13-15 supervisors and managers.
- Supervisors and managers increased support to Special Emphasis Programs (SEPs) and SEP Managers (SEPMs) (EPA has over 125 collateral duty SEP Managers).
- OCR expanded EEO practitioner access to the EPA national employee personnel database system on EEO and managed by the U.S. Department of the Interior (DOI) Oracle Business Intelligence Enterprise Edition (OBIEE). Access at the regional level decreased timely response rates to requests for EEO workforce analysis. OCR, in partnership with OHR, sponsored EEO practitioner training on the system while anticipating further upgrades by end of year to the platform - OBIEE. EEO practitioners are able to leverage useful dialogue on workforce analysis with their managers and supervisors on EPA EEO and diversity and inclusion workforce data.

- Each year the Agency presents the *Suzanne E. Olive Award for Exemplary Leadership in National EEO* to recognize individuals and/or groups for their significant contributions to EEO and civil rights, and diversity and inclusion while advancing the Administrator's theme of *Cross Agency Strategy: Embracing EPA as a High-Performing Organization*.

Essential Element II – Integration of EEO into the Agency's Strategic Mission

The *State of EEO* was given to the Administrator, along with other senior officials, capturing the Agency's prior fiscal year MD-715 performance and its progress in completing barrier analysis.

In addition, the Agency analyzed the performance levels and personnel needs of the internal and external civil rights programs and engaged in recruitment for the following occupations:

- A Program Analyst GS-0343-13/14 National Reasonable Accommodation Coordinator (NRAC) which will support the increasing needs of the national reasonable accommodation program at the Headquarters level;
- A Program Analyst GS-0343-14 (Associate Assistant Director-Team Leader) for the External Complaints and Compliance (Title VI) to support the increasing level of case management required;
- An Equal Opportunity Specialist GS-0360-11/13 for external complaints filed under Title VI of the Civil Rights Act of 1964;
- A Program Analyst GS-0343-14 (Associate Assistant Director-Team Leader) for affirmative employment programs to fulfill the increasing requirements of MD-715, the Agency's affirmative employment programs and to conduct barrier analysis;
- An Equal Employment Specialist GS-0260-9/12 (developmental) for the affirmative employment program; and,
- An Equal Employment Specialist GS-0260-12/13 in the Employee Complaints and Resolution Staff (Title VII), expected to be filled in FY 17, who will assist in processing the increasing number of complaints of discrimination and assist in the intake for the alternative dispute resolution program.

Efforts to integrate plans and activities that improve EEO and diversity and inclusion in the workplace were streamlined for all program offices and regions, such as: increasing the use of hiring panels, increasing the use of special hiring authorities (i.e., Schedule A and disabled veterans); enhancing career development opportunities; increasing employee engagement; increasing the roles and responsibilities of SEPM as it pertains to affirmative employment initiatives, i.e., outreach, recruitment, and leveraging internal and external partnerships and alliances.

The Agency took a leadership role among federal agencies by giving employees the opportunity to voluntarily self-disclose one's sexual orientation and gender identity (SOGI). In addition to workforce demographic data on race, national origin, sex, and disability, SOGI data collection will further assist in the enhancement of areas such as:

- *Promoting Equal Employment Opportunities*
- *Cultivating Workplace Diversity and Inclusion*
- *Enhancing Employee Engagement and Development*
- *Tracking and Measuring Effectiveness*

EPA with support from the Office of Personnel Management (OPM) and the EEOC, piloted this federal agency effort in three phases:

- **Phase 1** – Test group data collection. OCR collaborated with OGC and Region 5 to pilot a collection of SOGI data. Employees in OGC and Region 5 were given an opportunity to respond to three SOGI questions. Five hundred and twenty employees responded, with a response rate of 40%. Additionally, the National Center for Health Statistics recommended that the three SOGI questions used in the pilot program move forward in Phase 2.
- **Phase 2** – Agency implementation of employee self-disclosure of SOGI information. DOI and OPM agreed to expedite changes to the Federal personnel payroll system (FPPS) and Employee Express to allow EPA employees to self-disclose SOGI information. This was a result of a ‘change request’ to IBC/FPPS initiated by the SOGI group and voted upon by the Office of Management and Budget in September. Full implementation is expected August 2017.
- **Phase 3** – Agency implementation to EPA applicants. EEOC will consider making recommendations to update the applicant form with the SOGI questions. The EPA SOGI representatives have participated in the OPM Diversity in Government Council Critical Issues Workgroup on LGBT issues which will assist in this effort.

EPA’s SOGI representatives continue to develop national internal communications to ensure all employees understand why SOGI data is important to the workplace and what the Agency plans to do with the data. EPA has shared its experience with the SOGI pilot with other agencies, and some of those agencies now have SOGI data collection efforts underway.

EPA assesses its partnerships and alliances with diverse professional organizations and educational institutions to achieve a more diverse pool of applicants. The Agency measured its success in achieving a more diverse pool of applicants through the assessment of recruitment strategies and existing tools intended to increase diversity, for example:

The Agency coordinated recruitment activities such as announcing job vacancies using a Diversity Recruitment Source List created in FY 15. The list, managed through the HR Shared Service Centers (SSCs), centralizes the effort to reach schools, universities, organizations and associations for all permanent (full/part time) job announcements. The Agency analysis of the cost effectiveness of this strategy resulted in the development of a more focused approach between the SSCs and EPA managers for all recruitment actions to ensure increased diversity in applicant pools. For example, SSCs and OHR officials and hiring managers collaborate early in the recruitment process to identify eligible candidates from various sources such as: Schedule A, disabled veterans, Workforce Recruitment Program (WRP) for students with disabilities, Bender contract (open to all Federal agencies), Pathways programs, and partnerships with schools to direct their recruitment.

OHR launched an update in FY 16 to its Minority Serving Institutions (MSIs) database which tracks program offices and Regions’ financial assistance and other activities which support MSIs and the White House MSIs initiatives. Further, all program offices, Regions and labs ensured the placement of MSI Coordinators who managed and reported these activities. OHR provided guidance and coordinated training for all MSI Coordinators.

EPA reviewed existing Memorandum of Understanding (MOUs) with MSIs to plan effective outreach opportunities. The review process resulted in the following engagement: the renewal of the MOU with the Vermont Law School on Distant Learning for the advancement of environmental education between the Vermont Law School and MSIs; the renewal of the Gallaudet MOU; the extension of the Howard University MOU, and the creation of the Rochester Institute of Technology/National Technical Institute for the Deaf MOU. The review and renewal of MOUs affords an opportunity for EPA to refocus its outreach activities, information disseminated on careers at EPA, and interactions with the next generation of potential agency employees.

OHR, along with OCR, assessed the internal communication and tracking methods used in monitoring areas of affirmative employment, including streamlining efforts to capture data on outreach, professional development, employee engagement, and retention. In FY 16, OHR and OCR increased efforts to collaborate on strategies related to EEO and affirmative employment programs. The strategies would improve communication, create an internal and external exchange of information, and standardize reporting requirements such as the MD-715, Federal Equal Opportunity Recruitment Program (FEORP), Disabled Veterans Affirmative Action Program (DVAAP), and other annual reports that require the collection of workforce data and analysis.

Essential Element III - Management and Program Accountability

The OCR Director (Acting) reported directly to the Administrator to ensure accountability throughout the Agency. OCR provided technical guidance to all EPA program management officials, OHR, and others with the implementation of plans in accordance with MD-715 guidance. In FY 16, assessments and effective implementation of programs, policies, and procedures included:

- *Notification and Federal Employee Antidiscrimination and Retaliation Act of 2002 (No FEAR Act)*- The agency required No FEAR ACT training for all current and new employees.
- *Implementation of Civil Rights Programs* - The *Deputy Civil Rights Officials (DCROs)* implemented civil rights programs consistent with Agency policy and directives, by participating in a minimum of two civil rights briefings per year to ensure accountability of national civil rights efforts and oversight of civil rights programs within their respective offices. Additionally, the DCROs participated in mid and annual Technical Assistance Visits (TAVs) where assessments and plans were discussed in accordance with MD-715.
- *Complaints of Discrimination* During the TAVs and upon senior leadership request, OCR provides a status of each program office's informal and formal complaints of discrimination.
- *Technical Assistance Visits (TAVs)* – OHR and OCR provided regular consultations, guidance, data analytics and feedback to assist with the effective implementation of programs, policies and procedures pursuant to the guidance of MD-715. Furthermore, each program office developed a multi-year action plan for MD-715 and workplace diversity and inclusion.
- *Review of Potential Systemic Barriers* – OHR and OCR partnered to identify strategic areas where OCR can participate in assessment of programs, policies, and procedures that may have systemic barriers impacting full participation in areas such as EEO programs, promotions, awards, career development and training. In FY 16, both offices made efforts toward building a more robust SEP with clearly defined programmatic roles and responsibilities.

To further expand its efforts to ensure implementation of effective EEO programs and plans at all management levels, EPA focused on the following:

- *Benchmarking* - Interagency benchmarking in areas of EEO and diversity and inclusion. OHR and OCR attended annual federal interagency meetings sponsored by the U.S. Department of Labor, EEOC, OPM and the White House on hiring Persons with Disabilities (PWDs). There, OHR and OCR learned of practices that will help increase the dissemination of EPA job announcements among PWD. OHR and OCR partnered to enhance management's awareness of hiring authorities for PWD/ persons with targeted disabilities (PWTD), such as Schedule A, the conversion of Schedule A employees to the competitive service and recruitment sources that identify PWD, PWTD, and disabled veterans. In addition, OHR and OCR partnered to promote the newly developed database of PWD resumes. EPA had 799 full-time/part-time permanent new hires and 360 temporary new hires in FY 16. Of the 1159 total new hires, 111 (9.68%) had a reportable disability and 19 (1.64%) had a targeted disability. Of the total new hires, 86 (10.8%) were disabled veterans (with a 30% or more disability).

- *Employee Engagement Committees* - In response to the Federal Employee Viewpoint Survey EPA management established Employee Engagement Committees. These committees have diverse participation, including members of related groups such as SEPs.
- *Diversity and Inclusion Advisory Committee (DIAC)* - In FY 16, OARM explored options for restructuring the membership and purpose of the DIAC. The goal was to strengthen its platform of engagement around plans and activities that support EEO and diversity and inclusion; and to evaluate committee effectiveness by identifying appropriate goals and objectives with metrics to measure outcomes. To further promote collaboration, the OHR and OCR Directors help facilitated the DIAC activities. In FY 16, the DIAC also considered additional representation from OCR on workgroups that create initiatives involving the assessment of personnel programs, policies, and procedures that have impact on areas of EEO and diversity and inclusion. Relaunch of the new structure is expected for FY 17.

Essential Element IV – Proactive Prevention

- *EPA 5-Year Strategic Plan for Federal Employment of Individuals with Disabilities under Executive Order 13548 (2011)* - Proactive steps were taken to provide equal opportunity to qualified individuals with disabilities in all aspects of federal employment. These steps lead to an increase in the hiring of individuals with disabilities in FY16.
- *Effective Processes and Procedures for Reasonable Accommodations* - The Agency uses two sets of RA procedures: 1) National Reasonable Accommodation Procedures for AFGE bargaining unit members and applicants for AFGE bargaining unit positions; and 2) EPA's Reasonable Accommodation Procedures for Employees and Applicants with Disabilities. Both procedures are made available to all employees on the EPA's intranet site. The National Reasonable Accommodation Coordinator (NRAC) regularly briefed the OCR Director and Local Organizations Reasonable Accommodation Coordinator (LORACs) on compliance with written procedures.
- *Timely Response to Reasonable Accommodations*- The Agency processed 265 of the 294 (90%) requests for reasonable accommodations within the time frames identified in both the AFGE National Reasonable Accommodation Procedures and the EPA Reasonable Accommodation Procedures. The Agency has attained and exceeded a 90% processing rate for the sixth consecutive year in compliance with the requirements outlined in MD-715.
- *Tracking and Monitoring Reasonable Accommodation systems* – To address the increase of requests for reasonable accommodations, OCR and the NRAC assessed the Agency's existing methods to address, track and monitor requests for reasonable accommodations and developed a new electronic case tracking system.
- *EPA Procedures for Addressing Workplace Harassment - EPA Order 4711*. The Administrator issued EPA's Anti-Harassment Policy and Procedures in November 2015, which sets out procedures for reporting and investigating allegations of workplace harassment. The national procedures reflect the Agency's effort to prevent harassment on all protected bases (including, but not limited to, sexual harassment and retaliation) in the workplace. The procedures:
 - Inform employees as to what type of behavior is prohibited, and the steps to take to report harassment.
 - Provide for multiple avenues of redress, in addition to the EEO complaint process.
 - Provide that no acts of retaliation will be tolerated.

All managers and supervisors participated in EEOC facilitated training of these procedures between October 2015 and March 2016. All other employees participated in online training between February and September 2016.

- *Transgender and Gender Non-Confirming Policy Statement and Transgender and Gender Non-Confirming Employees Procedure – EPA Order 1000.31B.* Extensive collaboration between OCR, OGC, OARM and SEPMs began in FY 15 to develop the first Transgender and Gender Non-Confirming Policy and Procedure which was issued by the Administrator on June 14, 2016.
- “*Ally Pledge*” (Pledge) – In FY 16, the Special Emphasis Program for Lesbian, Gay, Bisexual and Transgender Advisory Council introduced the pilot program where employees can voluntarily pledge to create a work environment where all can bring their full selves, talents and abilities to serve the public. Receiving the endorsement of the Administrator, the intent of the pledge is to increase awareness around inclusion and ensure employees do not feel the need to hide their sexual orientation or gender identity. More than 700 employees voluntarily signed the pledge in FY 16. The Agency is exploring opportunities where the pledge can be expanded to all SEPs in FY 17.
- *Notification and Federal Employee Antidiscrimination and Retaliation Act of 2002 (No FEAR Act).* In FY 16, 99.41% of EPA employees participated in biennial No FEAR Act training. Additionally, EPA required all new employees to complete the online No FEAR Act training within their first 90 days. In the biennial training period, 63.39% of the 620 new permanent EPA employees took the training within the first 90 days. The Agency worked with OHR to further explore opportunities where new employees can receive regulated training such as during the Agency's orientation program.

Essential Element V – Efficiency

- *Timely processing of informal EEO complaints of discrimination* - EPA's success in meeting processing times include the following areas: timely fact-finding for informal complaints of discrimination, offers to participate in alternative dispute resolution (ADR), and the number of ADR acceptance responses. Even with the loss of integral ADR staff, timeliness rates for ADR offers for informal EEO complaints of discrimination increased from 92% in FY 15 to 96% in FY 16. Although ADR offer rates for participation decreased from 82% in FY 15 to 75% in FY 16, ADR participation rates increased from 41% in FY15 to 47% in FY 16. In FY 16, 33% of ADR cases were resolved.
- *Timely Response to Requests for Final Agency Decisions* – Response rates of those individuals who have filed a formal complaint of discrimination are received within thirty days and have benefitted from last year's addition of a staff attorney who is assigned to draft FADs. While the additional staff attorney has improved the internal OCR processing time for drafting FADs, OCR has been confronted with an increase of complaints in FY 16.
- *Regular National EEO meetings* - The OCR Director (Acting) conducted regular meetings with the EEO community, including lab managers and collateral duty EEO Counselors, to keep them apprised of processing statistics, provide updates on important process changes or emerging issues, and identify solutions to address common problems with work products.
- *EEO Training for Counselors* - In FY 16, the EEO Counselor Training Committee identified and/or delivered fourteen (14) 1.0 to 1.5-hour training sessions as re-certification opportunities. In FY 16, 26 collateral-duty EEO Counselors earned 254 credit hours. In addition, 25 full-time EEO employees also participated in the training sessions, receiving 212.5 credit hours. The Agency provided the EEO Community the following training and awareness opportunities in FY 16:

Cultural Awareness Series: LGBT; Internal mediation pilot briefing update; Face-to-Face Interviews in a Virtual World/Skype for Business for EEO Counselors; Dealing with Bullying in the Workplace; Unconscious Bias: Hidden Barriers; Working with Difficult People: How to Work with Aggressive People; NO FEAR Act; Micro-behaviors: Understanding, Harnessing and Leveraging the Power of the Unconscious Mind; Complaints Resolution: an EPA LGBT on-line discussion; What Does the *Macy Decision* mean for EPA.

- *OCR Contracts Ensuring Effective Processing* - In addition, OCR evaluated existing contracts to ensure effective processing of complaints of discrimination. This evaluation resulted in the Agency's continued use of the existing contractor. The current standard operating procedures (SOPs) provide effective guidance on processing EEO cases and imposing penalties on the contractor when investigatory materials are late.

Essential Element VI – Responsiveness and Legal Compliance

EPA continued to focus on compliance with the EEO laws and EEOC regulations, policy guidance, and other written guidance. Plans for addressing newly identified gaps, from prior fiscal years are further discussed in Part H of this report. *See EEO Plan for Attaining the Essential Elements of a Model EEO Program.*

- There was a 12% decrease in the average number of days to complete an investigation. The average number of days to complete the investigation decreased from 243 days in FY 15 to 213 days in FY 16.
- In FY 16, rates for formal complaints of discrimination reached a high of 86, surpassing the 58 filed in FY 15. This represents a 48% increase in formal complaints.
- OCR utilized an internal FAD management plan to re-assess the inventory and update the processing to reduce the inventory of FADs and meet the regulatory 60-day timeline. OCR has used the services of contractors, in addition to OCR staff attorneys, to reduce the active docket.

Workforce Profiles and Analysis

The EPA analyzed its workforce profiles to identify any triggers that may require further inquiry as to the existence of barriers to equal employment opportunities for an employee group based on race, ethnicity, sex or disability. The Agency's plans to complete barrier analyses are included with this EEO Program Status Report where necessary.

Total Workforce

In FY 16, EPAs total workforce had 14,723 (93.45%) full-time/part-time permanent (permanent with status) employees and 1,031 (6.54%) temporary (temporary or term appointment having no permanent status) employees for a total workforce of 15,754. At the close of FY 15, EPA employed 14,620 (93.92%) full-time/part-time permanent employees and 946 (6.08%) temporary employees for a total of 15,566 employees. This was a net increase of 103 (0.70%) full-time/part-time permanent employees, and a net increase of 85 (8.99%) temporary employees for a total net increase in FY 16 of 188 (1.21%) employees in the total workforce.

Males comprised 7,707 (48.92%) of the total workforce as compared to 51.84% of the national civilian labor force (NCLF) in FY 16. Females comprised 8,047 (51.08%) of the total workforce as compared to 48.16% of the NCLF. In FY 15, Males comprised 7,642 (49.09%) and Females comprised 7,924 (50.91%) of the total workforce. This was also a net decrease for Males at 65 (-0.17%) and a net increase of 123 (0.17%) for Females.

See Appendices for FY 16 Table A1.

At the end of FY 16, the number of PWTD in EPA's permanent and temporary workforce declined from 364 (2.34%) in FY 15 to 346 (2.20%) in FY 16, resulting in a net decrease of 18 (4.95%). The decline continued from the 378 (2.38%) total workforce in FY 2014. Snapshot 1 below displays the disability status for the EPA total workforce in FY 16 as compared to EEOC's Federal Benchmark of 2.00% of the workforce being PWTD:

Snapshot 1

EPA Total Workforce (Permanent/Temporary) % For Persons With Disabilities/Persons With Targeted Disabilities					
FY 16 Total Workforce (Permanent/Temporary)	% Non-Disabled	% Not Identified	% Disabled	% Targeted Disabled (subset of % Disabled)	% Targeted Disabled Federal Benchmark
15,754	90.07%	2.51%	7.42%	2.20%	2.00%

Of the total workforce, 1121 (7.61%) were full-time/part-time permanent PWD, an increase of 30 (0.15%) since FY 15. Of the total workforce, 339 (2.30%) were temporary PWTD, a decrease of 20 (0.15%) since FY 15. *Appendices: See Appendices for FY 16 Table B1.*

Permanent Workforce (excluding temporary employees)

The permanent employee workforce identified in Snapshot 2 (below) is where EPA can undertake a wide-range of barrier analysis to identify potential triggers and barriers and execute plans for eliminating them. It is noted that because EPA's temporary employee workforce does not comprise a significant portion of its workforce, an examination of EEO data relating to these employees may not assist the Agency in identifying any meaningful disparities resulting from barriers to equal opportunity. It is recognized that

temporary employees will not experience the same career progression as the permanent workforce, and certain data, such as promotion rates, may not be relevant to temporary employees.

Interpretation of Snapshot 2 exhibiting the EPA permanent workforce will provide a diagnostic tool to focus on meaningful disparities and areas where potential barriers may exist and may require closer attention. Multiple years of data are provided to give a glimpse into the trends for race, national origin, and sex.

Additionally, both National Civilian Labor Force and Relevant Civilian Labor Force statistics are provided as benchmarks. The National Civilian Labor Force consists of all persons over 16 years of age, who are not institutionalized or on active duty in the armed forces, and who either have a job or want a job. It is a national weighted average of demographic statistics pertaining only to occupations seen within EPA. *See Appendices for FY 16 Table A-1.*

Snapshot 2

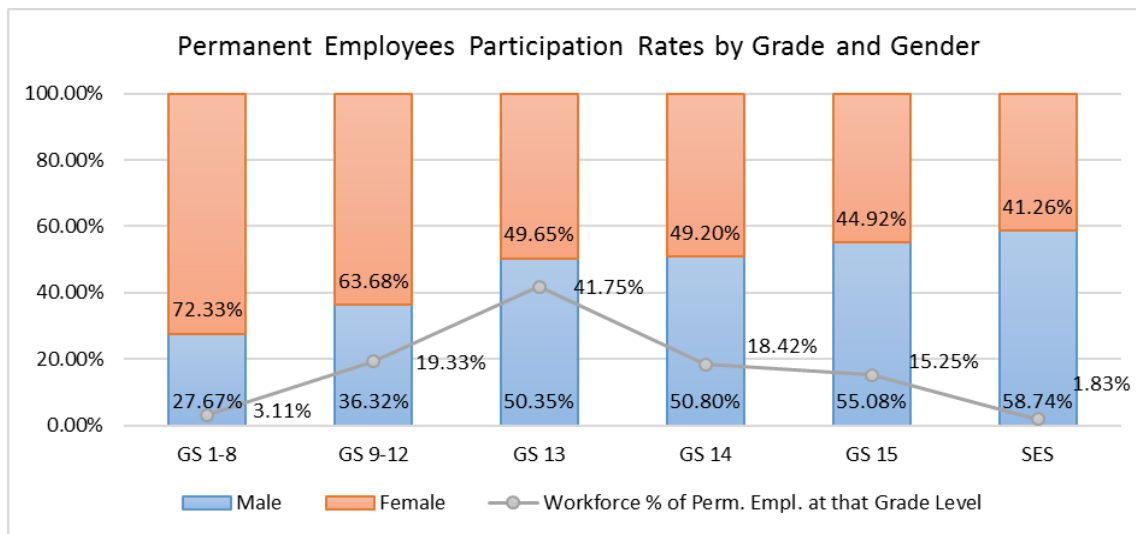
EPA Permanent Workforce % Compared to 2010 Civilian Labor Force (CLF%)*						
RNO	Total EPA %	National CLF %	Male EPA %	Male CLF %	Female EPA %	Female CLF %
Hispanic or Latino	6.48	9.96	3.09	5.17	3.7	4.79
White	67.4	72.36	35.91	38.33	30.59	34.03
Black or African American	17.45	12.02	5.02	5.49	13.14	6.53
Asian	7.03	3.9	3.32	1.97	3.56	1.93
Native Hawaiian/ Other Pacific Islander	0.11	0.14	0.05	0.07	0.05	0.07
American Indian/Alaska Native	1	1.08	0.46	0.55	0.56	0.53
Two or More Races	0.48	0.54	0.16	0.26	0.33	0.28

**All analysis of these data tables should be based on the percentages, not the numbers.*

Participation by Grade Level

Highlighted in *Snapshot 3* are the full-time/part-time permanent workforce participation rates at each grouped grade level compared to EPA gender participation rates. EPA workforce participation rates at the GS 1-8 level is 3.11%, of which 72.33% are Females. EPA workforce participation rates at the GS 9-12 level is 19.33%, of which 63.68% are Females. Notably, Female participation rates are higher than Male participation rates at the lower grade levels (< GS 13); while Male participation rates begin to increase at the senior grade levels (GS 13>), toward the SES level.

Snapshot 3



When comparing participation rates for RNO groups at mid and senior grade levels (GS 9 - SES) to their participation rates in the EPA permanent workforce, the Agency identified groups with less than anticipated participation rates. Snapshot 4 identifies these groups. *See Appendices for Table A-1 and Table A-4-2.*

Snapshot 4

RNO/Gender Participation in Grade Level is Lower than RNO Rates of Participation in Permanent Workforce		
GRADE	RNO Males	RNO Females
GS-09	Hispanic, American Indian/Alaskan Native	Asian Female
GS-10	Hispanic, Native Hawaiian/Pacific Islander	Hispanic, Black, Native Hawaiian/Pacific Islander
GS-11	Hispanic, Asian Pacific Islander, American Indian/Alaska Native, Two or More Races	Native Hawaiian/Pacific Islander
GS-12	Hispanic, Native Hawaiian/Pacific Islander, American Indian/Alaska Native	
GS-13	Native Hawaiian/Pacific Islander	Black, Native Hawaiian/Pacific Islander
GS-14	Hispanic, Black, Asian, Native Hawaiian/Pacific Islander, American Indian/Alaska Native	Hispanic, Black, Native Hawaiian/Pacific Islander
GS-15	Hispanic, Black, Asian, Native Hawaiian/Pacific Islander,	Hispanic, Black, Asian Pacific Islander,
GS-SES	Hispanic	Hispanic, Black, Native Hawaiian/Pacific Islander, American Indian/Alaska Native, Two or More Races

The Agency to analyzed the less than expected participation rates represented by the NCLF of the following seven EPA major occupations: Environmental Protection Specialist (0028), Miscellaneous Administrative and Program Specialist (0301), Management/Program Analyst (0343), General Biological Science (0401), Environmental Engineer (0819), General Attorney (0905), and Physical/Environmental Scientist (1301). These seven major occupations represent 67.38% of EPA's full-time/part-time permanent workforce (14,620). *See Appendices for Table A-6.*

The RNO groups with a less than expected rate of participation are highlighted in Snapshot 5 for each of the seven major occupations:

Snapshot 5

EPA Major Occupations Compared to 2010 Occupational CLF*														
	Hispanic		White		African American		Asian Pacific Islander		Native Hawaiian		American Indian/ Alaska Native		Two or more races	
	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female
Envr Pro Spc (0028)	2.95%	4.11%	30.46%	38.24%	3.76%	12.66%	1.92%	3.62%	0.00%	0.13%	0.67%	0.85%	0.31%	0.31%
Occ CLF	2.22%	1.34%	64.84%	23.87%	2.02%	1.58%	1.79%	1.03%	0.11%	0.01%	0.60%	0.31%	0.23%	0.05%
Gen Admin (0301)	2.43%	5.04%	19.40%	27.99%	5.78%	35.07%	1.68%	1.49%	0.00%	0.00%	0.37%	0.19%	0.19%	0.37%
Occ CLF	2.86%	5.87%	27.06%	43.84%	3.60%	8.89%	2.57%	3.64%	0.03%	0.05%	0.33%	0.62%	0.26%	0.39%
Mgmt Analyst (0343)	1.90%	3.59%	20.22%	33.26%	5.79%	29.67%	1.25%	2.86%	0.00%	0.00%	0.29%	0.44%	0.22%	0.51%
Occ CLF	2.46%	2.14%	49.01%	32.56%	3.03%	3.80%	3.33%	2.46%	0.02%	0.04%	0.31%	0.32%	0.27%	0.24%
Biologist (0401)	1.81%	3.05%	40.17%	39.41%	2.96%	4.87%	2.96%	3.63%	0.00%	0.00%	0.38%	0.57%	0.00%	0.19%
Occ CLF	2.44%	2.17%	44.27%	39.49%	1.39%	1.59%	3.17%	4.15%	0.05%	0.05%	0.48%	0.35%	0.19%	0.20%
Envr Eng (0819)	6.07%	4.05%	43.56%	23.87%	4.79%	4.72%	7.24%	4.72%	0.06%	0.00%	0.31%	0.31%	0.12%	0.18%
Occ CLF	2.92%	0.89%	62.81%	19.13%	4.27%	1.95%	4.98%	1.90%	0.01%	0.12%	0.55%	0.17%	0.23%	0.06%
Attorney (0905)	2.93%	3.62%	39.00%	38.32%	1.96%	5.67%	1.96%	4.69%	0.10%	0.00%	0.39%	0.78%	0.00%	0.59%
Occ CLF	2.52%	1.85%	59.68%	26.68%	2.13%	2.60%	1.82%	1.74%	0.02%	0.01%	0.31%	0.23%	0.22%	0.18%
Gen Phy Sci (1301)	3.46%	2.69%	46.83%	31.65%	2.93%	4.37%	3.46%	3.36%	0.00%	0.00%	0.67%	0.48%	0.00%	0.10%
Occ CLF	2.36%	1.92%	48.15%	27.82%	1.41%	2.21%	8.20%	6.74%	0.03%	0.00%	0.44%	0.18%	0.30%	0.24%

*EPA highlighted positions that had rates of participation that were, at minimum, 1% less than their occupational rates of participation within the civilian labor force.

Applicant Flow Data

Although GS 0905 General Attorneys constitute one of EPA's major occupations, applicant flow data is not tracked by the same method as the other major occupations due to the excepted service selection process. Therefore, EPA is developing a process to collect data for this occupation in accordance with EEOC guidance.

The data in Snapshot 5 were used to analyze applicant flow data for six of the seven EPA major occupations. In addition, the Agency applicant flow data source was used to analyze the less than expected rates of participation found within two occupations: Environmental Protection Specialist (0028) and the Environmental Engineer (0819). Since RNO is analyzed in the application flow data, selections from applicants who did not self-identify their RNO were not included. *For this section see Appendices for Table A-7.*

Environmental Protection Specialist (0028): 7,919 Applicants

EPA received a total of 7,919 applications for the Environmental Protection Specialist positions in FY 16. Of those applicants, 5,346 or 67.50% voluntarily self-identified their RNO. In addition, there were 3,665 or 68.56% of those who self-identified met the basic qualifications for the position. Of those who self-identified their RNO and qualified for the position, 80 were selected. Snapshot 6 shows a demographic breakdown of those individuals who voluntarily self-identified their RNO and sex and applied, qualified, and selected for the Environmental Protection Specialist positions.

Snapshot 6

Total RNO Group (7,919)	# of Individuals Voluntarily Self-Identified			# of Individuals Self-Identified/Basic Qualifications			#/% of Individuals Self-Identified/Selected		
	Total (5,346)	Male (2,874)	Female (2,472)	Total (3,655)	Male (1,898)	Female (1,760)	Total (80)	Male (32)	Female (48)
Hispanic	689 (12.89%)	372 (7.00%)	317 (5.90%)	502 (13.73%)	261 (7.10%)	241 (6.60%)	9 (11.25%)	6 (7.50%)	3 (3.80%)
White	3,003 (55.65%)	1,664 (31.10%)	1,339 (25.00%)	2,046 (55.98%)	1,090 (29.80%)	956 (26.20%)	55 (68.75%)	23 (28.80%)	32 (40.00%)
Black	1,003 (18.76%)	494 (9.30%)	509 (9.50%)	669 (18.30%)	320 (8.80%)	349 (9.50%)	12 (15.00%)	1 (1.20%)	11 (13.80%)
Asian Pacific Islander	441 (8.25%)	218 (4.10%)	223 (4.20%)	314 (8.59%)	157 (4.30%)	157 (4.30%)	3 (3.75%)	2 (2.50%)	1 (1.20%)
Native Hawaiian/Other Pacific Islander	29 (0.54%)	17 (0.30%)	12 (0.20%)	14 (0.38%)	6 (0.20%)	8 (0.20%)	0 (0.00%)	0 (0.00%)	0 (0.00%)
American Indian/Alaska Native	112 (2.09%)	71 (1.30%)	41 (0.80%)	74 (1.38%)	44 (1.20%)	30 (0.80%)	1 (1.25%)	0 (0.00%)	1 (1.20%)
Two or More Races	69 (1.29%)	38 (0.70%)	31 (0.60%)	36 (0.98%)	17 (0.50%)	19 (0.50%)	0 (0.00%)	0 (0.00%)	0 (0.00%)

Review of this data reveals triggers requiring further analysis. For further detail, see Part I on New Hires.

Environmental Engineer (0819): 5,806 Applicants

In FY 16, EPA received 5,806 applications for the Environmental Engineer positions, of which 4,112 (70.7%) voluntarily self-identified their RNO. Of those to provide their RNO, 3,532 qualified, and 46 selected for the position. Snapshot 7 shows a demographic breakdown of those individuals who voluntarily self-identified their RNO, and applied, qualified and selected for the Environmental Protection Specialist positions.

Snapshot 7

Total RNO Group (5,806)	# of Individuals Voluntarily Self-Identified			# of Individuals Self-Identified/Basic Qualified			#/% of Individuals Self-Identified/Selected		
	Total (4,112)	Male (2,492)	Female (1,620)	Total (3,532)	Male (2,137)	Female (1,395)	Total (46)	Male (29)	Female (17)
Hispanic	430 (0.77%)	242 (5.90%)	188 (4.60%)	360 (10.19%)	202 (5.70%)	158 (4.50%)	3 (6.52%)	2 (4.30%)	1 (2.20%)
White	2,581 (62.77%)	1,526 (37.10%)	1,055 (25.70%)	2,227 (63.05%)	1,322 (37.40%)	905 (25.60%)	31 (67.39%)	20 (43.50%)	11 (23.90%)
Black	479 (11.65%)	292 (7.10%)	187 (4.50%)	412 (11.66%)	254 (7.20%)	158 (4.50%)	2 (4.34%)	1 (2.20%)	1 (2.20%)
Asian Pacific Islander	548 (13.33%)	375 (9.10%)	173 (4.20%)	478 (13.53%)	317 (9.00%)	161 (4.60%)	10 (21.73%)	6 (13.00%)	4 (8.70%)
Native Hawaiian/Other Pacific Islander	1 (0.02%)	1 (0.00%)	0 (0.00%)	1 (0.03%)	1 (0.00%)	0 (0.00%)	0 (0.00%)	0 (0.00%)	0 (0.00%)
American Indian/Alaska Native	48 (1.17%)	42 (1.00%)	6 (0.10%)	35 (0.99%)	31 (0.90%)	4 (0.10%)	0 (0.0%)	0 (0.00%)	0 (0.00%)
Two or More Races	25 (0.61%)	14 (0.30%)	11 (0.30%)	19 (0.54%)	10 (0.30%)	9 (0.30%)	0 (0.00%)	0 (0.00%)	0 (0.00%)

Review of this data reveals triggers requiring further analysis. For further detail, see Part I.

New Hires

EPA had a total of 1,159 new hires in FY 16. Of the total of 799 permanent new hires 398 (49.81%) were Male and 401 (50.19%) were Female. Of the total of 360 temporary new hires 186 (51.67%) were Male and 174 (48.33%) were Female. (See Appendices for Table A-8).

Of the 799 permanent new hires, 13 (1.63%) had a targeted disability. Of the 360 temporary new hires 6 (1.67%) had a targeted disability. EPA had a total of 19 (1.64%) new hires with a targeted disability in FY 16. EEOC has provided federal agencies a Federal benchmark and ongoing goal for PWTD of 2.0%. (See Appendices for Table B-8). Snapshot 8 reflects demographic information for all FY 16 new hires.

Snapshot 8

FY 16 New Hires to EPA			Hispanic			White		Black		Asian Pacific Islander		Native Hawaiian/Other Pacific Islander		American Indian/Alaska Native		Two or more races		Disabilities	
		All	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	PWD	PWTD	
Permanent New Hires	#	799	32	27	258	252	63	79	35	34	3	0	4	3	2	1	87	13	
	%	100	4.01%	3.38%	32.29%	31.54%	7.88%	9.89%	4.38%	4.26%	0.38%	0.00%	0.50%	0.38%	0.25%	0.13%	10.89	1.63%	
Temporary	#	360	5	12	140	109	19	29	20	21	0	0	1	1	0	0	24	6	
	%	100%	1.39%	3.33%	38.89%	30.28%	5.28%	8.06%	5.56%	5.83%	0.00%	0.00%	0.28%	0.28%	0.00%	0.00%	6.67%	1.67%	
Nat 2010 CLF	%	100%	5.17%	4.79%	38.33%	34.03%	5.49%	6.53%	1.97%	1.93%	0.07%	0.07%	0.55%	0.53%	0.26%	0.28%	Total 9.58%	Total 1.64%	

Review of this data reveals the above highlighted triggers requiring further analysis. For further detail, see Part I.

Separations

In FY 16, there were a total of 806 separations from EPA, of which 782 (97.02%) were voluntary and 24 (2.98%) involuntary. See Appendices for Tables A-1, 14 and B-1, 14. Separation (involuntary and voluntary) rates by RNO and sex are in Snapshot 9:

Snapshot 9

Separations by RNO/Disability	Separations by GENDER	Type of Separation VOLUNTARY	Type of Separation INVOLUNTARY	% in Current Permanent Workforce
806		782	24	14,723
Hispanic	Male	2.17%	8.33%	3.09%
	Female	2.69%	0.00%	3.70 %
White	Male	40.92%	25.00%	35.91%
	Female	30.18%	8.33%	30.59%
Black	Male	4.35%	20.83%	5.02%
	Female	11.76%	16.67%	13.14%
Asian Pacific Islander	Male	4.73%	8.33%	3.32%
	Female	2.17%	12.50%	3.56%

Snapshot 9 continued

Separations by RNO/Disability	Separations by GENDER	Type of Separation VOLUNTARY	Type of Separation INVOLUNTARY	% in Current Permanent Workforce
806		782	24	14,723
Native Hawaiian/Pacific Islander	Male	0.26%	0.00%	0.05%
	Female	0.13%	0.00%	0.05%
American Indian/Alaska Native	Male	0.00%	0.00%	0.46%
	Female	0.26%	0.00%	0.56%
Two or More Races	Male	0.38%	0.00%	0.16%
	Female	0.26%	0.00%	0.33%
PWD		10.87%	12.50%	7.42%
PWTD		29.00%	1.00%	2.20%

Snapshot 9 indicates there were RNO groups with separation rates higher than their representation rates in the workforce, requiring further analysis. This includes: involuntary separations for Hispanic Males, Black Males and Females, and Asian Males; voluntary separations for White Males, Asian Males, Native Hawaiian/Pacific Islander Males and Females, and Two or More Races Males. *See Appendices for Table A-14 and B-14.*

Summary of EPA Accomplishments

In FY 16, these programs promoted employee development to build the capacity for individual and organizational performance:

- *Senior Executive Service (SES) Pipeline Training* – In September 2015, the Agency assisted potential SES candidates by providing training on the SES application process. The training also included a panel discussion with current agency SES managers who answered questions on their experiences as Senior Executives at EPA.
- *SES Candidate Development Program (CDP)* The Agency began its first 13-month SES CDP which ended in September 2016 and had approximately 275 participants. The program was announced to all EPA employees, but targeted those with at least one year of experience equivalent to the GS 15 level. The Agency is offering the program again, which began in FY16 will end in FY17. This second program attracted 568 applications, both internal and external to the Agency. Applicant RNO data was not captured, however strategies are being developed to track RNO data.
- *First-Line Supervisor Pipeline Trainings* - OHR conducted two panel discussions about becoming first-line supervisors. These discussions covered multiple topics, including transitioning from peer to supervisor, managing nonperformers, work-life balance, supervisory training, and managing up and down.
- *EPA Talent Hub* – The Talent Hub website was launched to serve as a centralized resource for a range of career development opportunities available across the agency. The Talent Hub was a recommendation from the Human Resources Council and the High Performance Organization Team. Feedback from the *Federal Employee Viewpoint Survey* data, and discussions with employees were factored in the recommendation. The Talent Hub stores all full-and part-time details, and temporary promotion opportunities. The Talent Hub is continuously updated with opportunities, including mentoring and intergovernmental personnel assignments.
- *SOGI Pilot* - EPA initiated the first phase of *SOGI* by giving employees the opportunity to voluntarily self-disclose sexual orientation and gender identity information in addition to other workforce demographic data. SOGI data collected will be analyzed for application in four interrelated areas:

Promoting Equal Employment Opportunities; Cultivating Workplace Diversity and Inclusion; Enhancing Employee Engagement and Development; and Tracking and Measuring Effectiveness.

- *Hiring PWDs* - The Agency participated in the U.S. Department of Labor, EEOC, OPM and White House interagency sessions on hiring PWDs. These sessions focused on federal government practices to increase participation rates for PWD. At the end of FY 16, the EPA's total workforce of permanent/temporary employees consisted of 1,169 (7.42%) PWD and of those, 346 (2.2%) PWTD. Additionally, the number of disabled veterans (30% or more disabled) included 86 (10.8%) of the new hires in FY 16.
- *Reasonable Accommodations (RA)* - For the sixth consecutive year, the Agency attained a 90% processing rate for RA requests, in compliance with the requirements outlined in MD-715. A detailed summary of the status of FY 16 requests is located in Part I-5.
- *Timely Processing of RA Requests* - The Agency processed 268 of the 294 (91.1%) received RA requests within the time frames identified in both the AFGE National Reasonable Accommodation Procedures and the EPA Reasonable Accommodation Procedures. In FY 16, there were 71 more RA requests than the number of requests in FY 15.
- *RA Requests for Assistive Technology*— CAP processed and provided 56 assistive technology requests for EPA employees with disabilities in FY16 saving the Agency \$52,432.08. Overall, CAP has provided 1,436 accommodations from FY02 to FY16 with a total cost savings of \$1,079,163.97 for EPA.

The Path Forward

While EPA made noteworthy progress in FY 16, there are opportunities for growth. Although a barrier analysis was not conducted in FY 16, planned activities in Part I are carried over to FYs 17 and 18, including: reductions in the application and qualification rate triggers for internal and external hiring, and in the selection rate triggers in the internal competitive promotions, senior grades, and new hires.

- EPA continues to explore the root causes of triggers and develop activities to remediate triggers to equal employment and advancement opportunities where identified. This will continue the momentum that includes the development of four main activities:
 - Examination of each area of the hiring process in major occupations where lower than anticipated application, qualification, and selection rates are identified.
 - Tracking the reason for employees' departure from the Agency, specifically PWD/PWTD. By furthering its understanding of the reasons for leaving the Agency, EPA aims to improve its ability to retain talented staff.
 - Refining the process to collect, retain, and analyze applicant flow data for the occupational series 0905 Attorney positions, in coordination with OGC.
 - Enhancing recruitment by developing: a) tools to evaluate the effectiveness of the strategic recruitment plan and guidance document; b) tools to assess the effectiveness of career development activities; and, c) a process for collecting internal SES applicant flow data in accordance with the requirements of MD-715.

EPA will continue to promote education and ensure awareness of Schedule A Hiring Authorities for PWTD through the use of tool kits and communication with managers.

The following planned actions going into FY 17 will continue to be explored:

- Develop/implement processes to collect, retain, and analyze applicant flow data for Attorney Advisor, GS-0905, and SES positions.
- Develop/implement an alternative to the management hiring satisfaction survey to examine the hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified.
- Develop/implement a tool to evaluate the effectiveness of the strategic recruitment plan and guidance document.
- Further develop/implement training that includes information about competitive conversions and track the appointment and expiration dates of Schedule A hires.
- Develop/implement processes to collect data, retain, and analyze employee participation rates in career development opportunities including trainings, details, and e-learning.

Confirm that position descriptions present no triggers in major occupations where lower than anticipated application, qualification, and selection rates are identified.

EEOC FORM 715-01 PART F	<i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM EPA STATUS REPORT
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**Certification of Establishment of
Continuing Equal Employment Opportunity Programs**

I, Tanya Lawrence, Acting Director of the Office of Civil Rights, am the Principal EEO Director/ Official for the U.S. 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 standard 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 the 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

Date

Certifies that this Federal Agency Annual EEO Program
Status Report is in compliance with EEOC MD-715

Signature of Agency Head or Agency Head Designee

Date

Part G: Self-Assessment towards a Model EEO Program Checklist

Essential Element A: *Demonstrated Commitment from Agency Leadership*

Requires the agency head to issue written policy statements ensuring a workplace free of discriminatory harassment and a commitment to equal employment opportunity.

Compliance Indicator: EEO policy statements are up-to-date.		
EEOC MD 715 Agency Assessment Measures	Measure met? Yes or No	Comment or Explanation of Unmet Measures (EEOC Form 715-01 Part H)
1a. EPA Head was installed on June 18, 2013. The Administrator's initial EEO policy statement was issued January 2014. 1b. Was the initial EEO Policy Statement issued within 6 – 9 months of the installation of EPA Head? If no, provide an explanation.	Yes	NOTE: Administrator re-issues policy statements annually. FY 16 was issued March 2016.
2. During the current Agency Head's tenure, has the EEO Policy Statement been reissued annually? If no, provide an explanation.	Yes	
3. Are new employees provided a copy of the EEO Policy Statement during orientation?	Yes	
4. When an employee is promoted into the supervisory ranks, is s/he provided a copy of the EEO Policy Statement?	Yes	

Compliance Indicator: EEO policy statements have been communicated to all employees.		
EEOC MD 715 Agency Assessment Measures	Measure Met? Yes or No	EEOC MD 715 Agency Assessment Measures
5. Have the heads of subordinate reporting components communicated support of all Agency EEO policies through the ranks?	Yes	
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?	Yes	
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)]	Yes	

Compliance Indicator: Agency EEO policy is vigorously enforced by Agency management.		
EEOC MD 715 Agency Assessment Measures	Measure met? Yes or No	EEOC MD 715 Agency Assessment
8. Are managers and supervisors evaluated on their commitment to Agency EEO policies and principles, including their efforts to:	Yes	
a. Resolve problems/disagreements and other conflicts in their respective work environments as they arise?	Yes	
b. Address concerns, whether perceived or real, raised by employees and following-up with appropriate action to correct or eliminate tension in the workplace?	Yes	
c. 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?	Yes	
d. Ensure full cooperation of employees under his/her supervision with EEO office officials such as EEO Counselors, EEO Investigators, etc.?	Yes	
e. Ensure a workplace that is free from all forms of discrimination, harassment and retaliation?	Yes	
f. 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?	Yes	
g. Ensure the provision of requested religious accommodations when such accommodations do not cause an undue hardship?	Yes	
h. Ensure the provision of requested disability accommodations to qualified individuals with disabilities when such accommodations do not cause an undue hardship?	Yes	
9. Have all employees been informed about what behaviors are inappropriate in the workplace and that this behavior may result in disciplinary actions?	Yes	
10. Describe what means were utilized by EPA to so inform its workforce about the penalties for unacceptable behavior.	Yes	
11. 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?	Yes	
12. Have managers and supervisor been trained on their responsibilities under the procedures for reasonable accommodation?	Yes	

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

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.		
EEOC MD 715 Agency Assessment Questions	Measure met? Yes or No	Comment or Explanation of Unmet Measures (EEOC Form 715-01 Part H)
13. 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?)	Yes	
14. Are the duties and responsibilities of EEO officials clearly defined?	Yes	
15. Do the EEO officials have the knowledge, skills, and abilities to carry out the duties and responsibilities of their positions?	Yes	
16. If EPA has 2 nd level reporting components, are there organizational charts that clearly define the reporting structure for EEO programs?	N/A	
17. If EPA has 2 nd 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.		
EEOC MD 715 Agency Assessment Questions	Measure met? Yes or No	Comment or Explanation of Unmet Measures (EEOC Form 715-01 Part H)
18. 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?	Yes	

19. 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?	Yes	
20. 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?	Yes	
a. 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?	Yes	
b. 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)]	Yes	
21. 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?	Yes	

Compliance Indicator: EPA has committed sufficient human resources and budget allocations to its EEO programs to ensure successful operation.

EEOC MD 715 Agency Assessment	Measure met?	Comment or Explanation of Unmet Measures
Questions	Yes or No	(EEOC Form 715-01 Part H)
22. 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?	Yes	
23. 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?	Yes	

24. Are statutory/regulatory EEO related Special Emphasis Programs sufficiently staffed?	Yes	
a. Federal Women's Program - 5 U.S.C. 7201; 38 U.S.C. 4214; Title 5 CFR, Subpart B, 720.204	Yes	
b. Hispanic Employment Program - Title 5 CFR, Subpart B, 720.204	Yes	
c. 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	Yes	
25. 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?	Yes	

Compliance Indicator: EPA has committed sufficient budget to support the success of its EEO Programs.

EEOC MD 715 Agency Assessment Questions	Measure met?	Comment or Explanation of Unmet Measures
	Yes or No	(EEOC Form 715-01 Part H)
26. 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?	Yes	
27. 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?)	Yes	
28. Has funding been secured for publication and distribution of EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures, etc.)?	Yes	
29. Is there a central fund or other mechanism for funding supplies, equipment and services necessary to provide disability accommodations?	Yes	

30. Does EPA fund major renovation projects to ensure timely compliance with Uniform Federal Accessibility Standards?	Yes	
31. Is the EEO Program allocated sufficient resources to train all employees on EEO Programs, including administrative and judicial remedial procedures available to employees?	Yes	
a. 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)]	Yes	
b. Is there sufficient funding to ensure that all employees have access to this training and information?	Yes	
32. Is there sufficient funding: to provide all managers and supervisors with training and periodic up-dates on their EEO responsibilities?	Yes	
a. for ensuring a workplace that is free from all forms of discrimination, including harassment and retaliation?	Yes	
b. to provide religious accommodations?	Yes	
c. to provide disability accommodations in accordance with EPA's written procedures?	Yes	
d. in the EEO discrimination complaint process?	Yes	
e. to participate in ADR?	Yes	

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.

Compliance Indicator: EEO program officials advise and provide appropriate assistance to managers/supervisors about the status of EEO programs within each manager or supervisor's area of responsibility.		
EEOC MD 715 Agency Assessment	Measure met?	Comment or Explanation of Unmet Measures
Questions	Yes or No	(EEOC Form 715-01 Part H)
33. Are regular (monthly/quarterly/semi-annually) EEO updates provided to management/supervisory officials by EEO program officials?	Yes	

34. 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?	Yes	
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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)]

EEOC MD 715 Agency Assessment Questions	Measure met? Yes or No	Comment or Explanation of Unmet Measures (EEOC Form 715-01 Part H)
35. 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?	Yes	
36. 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?	Yes	
37. 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?	Yes	

Compliance Indicator: When findings of discrimination are made, EPA explores whether or not disciplinary actions should be taken.

EEOC MD 715 Agency Assessment Questions	Measure met? Yes or No	Comment or Explanation of Unmet Measures (EEOC Form 715-01 Part H)
38. Does EPA have a disciplinary policy and/or a table of penalties that covers employees found to have committed discrimination?	Yes	
39. 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?	Yes	

40. Has EPA, when appropriate, disciplined or sanctioned managers/supervisors or employees found to have discriminated over the past two years?	N/A	
If so, cite number found to have discriminated and list penalty/disciplinary action for each type of violation.		
41. 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?	Yes	
42. Does EPA review disability accommodation decisions/actions to ensure compliance with its written procedures and analyze the information tracked for trends, problems, etc.?	Yes	

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.

Compliance Indicator: Analyses to identify and remove unnecessary barriers to employment are conducted throughout the		
EEOC MD 715 Agency Assessment Questions	Measure met?	Comment or Explanation of Unmet Measures (EEOC Form 715-01 Part H)
42. 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?	Yes	
43. 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?	Yes	
44. Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans?	Yes	
45. Are trend analyses of workforce profiles conducted by race, national origin, sex and disability?	Yes	
46. Are trend analyses of the workforce's major occupations conducted by race, national origin, sex and disability?	Yes	

47. Are trends analyses of the workforce's grade level distribution conducted by race, national origin, sex and disability?	Yes	
48. Are trend analyses of the workforce's compensation and reward system conducted by race, national origin, sex and disability?	Yes	
49. Are trend analyses of the effects of management/personnel policies, procedures and practices conducted by race, national origin, sex and disability?	Yes	

Compliance Indicator: The use of Alternative Dispute Resolution (ADR) is encouraged by senior management.

EEOC MD 715 Agency Assessment Questions	Measure met? Yes or No	Comment or Explanation of Unmet Measures (EEOC Form 715-01 Part H)
50. Are all employees encouraged to use ADR?	Yes	
51. Is the participation of supervisors and managers in the ADR process required?	Yes	

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.

Compliance Indicator: EPA has sufficient staffing, funding, and authority to achieve the elimination of identified barriers.

EEOC MD 715 Agency Assessment Questions	Measure met? Yes or No	Comment or Explanation of Unmet Measures (EEOC Form 715-01 Part H)
73. Does the EEO Office employ personnel with adequate training and experience to conduct the analyses required by MD-715 and these instructions?	Yes	
74. Has EPA implemented an adequate data collection and analysis systems that permit tracking of the information required by MD-715 and these instructions?	Yes	
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?	Yes	

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?	Yes	
77. Are 90% of accommodation requests processed within the time frame set forth in EPA procedures for reasonable accommodation?	Yes	

Compliance Indicator: EPA has an effective complaint tracking and monitoring system in place to increase the effectiveness of EPA's EEO Programs.

EEOC MD 715 Agency Assessment	Measure met?	Comment or Explanation of Unmet Measures
Questions	Yes or No	(EEOC Form 715-01 Part H)
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?	Yes	
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?	Yes	
80. Does EPA hold contractors accountable for delay in counseling and investigation processing times?	Yes	
If yes, briefly describe how: <i>In the event of a delay, contract payment is reduced or the contract is not renewed.</i>		
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?	Yes	
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?	Yes	

Compliance Indicator: EPA has sufficient staffing, funding and authority to comply with the time frames in accordance with the

EEOC MD 715 Agency Assessment	Measure met?	Comment or Explanation of Unmet Measures
Questions	Yes or No	(EEOC Form 715-01 Part H)
83. Are benchmarks in place that compare EPA's discrimination complaint processes with 29 C.F.R. Part 1614?	Yes	
a. 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?	Yes	

b. Does EPA provide an aggrieved person with written notification of his/her rights and responsibilities in the EEO process in a timely fashion?	Yes	
c. Does EPA complete the investigations within the applicable prescribed time frame?	Yes	
d. When a complainant requests a final agency decision, does EPA issue the decision within 60 days of the request?	No	Please see explanation listed under Part H-1.
e. 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?	Yes	
f. When a settlement agreement is entered into, does EPA timely complete any obligations provided for in such agreements?	Yes	
g. Does EPA ensure timely compliance with EEOC AJ decisions which are not the subject of an appeal by EPA?	Yes	

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.

EEOC MD 715 Agency Assessment	Measure met?	Comment or Explanation of Unmet Measures
Questions	Yes or No	(EEOC Form 715-01 Part H)
84. 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?	Yes	
85. 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?	Yes	
86. After EPA has offered ADR and the complainant has elected to participate in ADR, are the managers required to participate?	Yes	
87. Does the responsible management official directly involved in the dispute have settlement authority?	Yes	

Compliance Indicator: EPA has effective systems in place for maintaining and evaluating the impact and effectiveness of its		
EEOC MD 715 Agency Assessment Questions	Measure met? Yes or No	Comment or Explanation of Unmet Measures (EEOC Form 715-01 Part H)
88. 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?	Yes	
89. 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)?	Yes	
90. 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?	Yes	
91. Do EPA's EEO programs address all of the laws enforced by the EEOC?	Yes	
92. 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?	Yes	
93. Does EPA track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD-715 standards?	No	Please see Part H-2.
94. Does EPA consult with other agencies of similar size on the effectiveness of their EEO programs to identify best practices and share ideas?	Yes	

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.		
EEOC MD 715 Agency Assessment Questions	Measure met? Yes or No	Comment or Explanation of Unmet Measures (EEOC Form 715-01 Part H)
95. 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?	Yes	

96. Does EPA discrimination complaint process ensure a neutral adjudication function?	Yes	
97. If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints?	Yes	

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.

Compliance Indicator: Agency personnel are accountable for timely compliance with orders issued by EEOC Administrative Judge		
EEOC MD 715 Agency Assessment Questions	Measure met? Yes or No	Comment or Explanation of Unmet Measures (EEOC Form 715-01 Part H)
98. 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?	Yes	

Compliance Indicator: EPA's system of management controls ensures that EPA timely completes all ordered corrective action		
EEOC MD 715 Agency Assessment Questions	Measure met? Yes or No	Comment or Explanation of Unmet Measures (EEOC Form 715-01 Part H)
99. Does EPA have control over the payroll processing function of EPA? If Yes, answer the two questions below.	Yes	
a. Are there steps in place to guarantee responsive, timely, and predictable processing of ordered monetary relief?	Yes	
b. Are procedures in place to promptly process other forms of ordered relief?	Yes	

Compliance Indicator: Agency personnel are accountable for the timely completion of actions required to comply with orders of EEOC.		
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EEOC MD 715 Agency Assessment Questions	Measure met? Yes or No	Comment or Explanation of Unmet Measures (EEOC Form 715-01 Part H)
100. Is compliance with EEOC orders encompassed in the performance standards of any agency employees?	Yes	
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.		
101. Is the unit charged with the responsibility for compliance with EEOC orders located in the EEO office?	Yes	
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		
102. Have the involved employees received any formal training in EEO compliance?	Yes	
103. Does EPA promptly provide to the EEOC the following documentation for completing compliance:		
a. 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?	Yes	
b. Awards: A narrative statement by an appropriate agency official stating the dollar amount and the criteria used to calculate the award?	Yes	
c. 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?	Yes	
d. Compensatory Damages: The final agency decision and evidence of payment, if made?	Yes	
e. 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?	Yes	
f. Personnel Actions (e.g., Reinstatement, Promotion, Hiring, Reassignment): Copies of SF-50s	Yes	
g. 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.	Yes	

h. 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).	Yes	
i. Final Agency Decision (FAD): FAD or copy of the complainant's request for a hearing.	Yes	
j. Restoration of Leave: Print-out or statement identifying the amount of leave restored, if applicable. If not, an explanation or statement.	Yes	
k. Civil Actions: A complete copy of the civil action complaint demonstrating same issues raised as in compliance matter.	Yes	
l. Settlement Agreements: Signed and dated agreement with specific dollar amounts, if applicable. Also, appropriate documentation of relief is provided.	Yes	

Part H: Plan to Correct Deficiencies

Part H-1: Timeliness and Effectiveness of EEO Complaints Processing Program

Statement of Model Program Essential Element Deficiency:	(Part G: Q-87) When a complainant requests a Final Agency Decision, does EPA issue the decision within 60 days of the request? No.
Objective:	To ensure that FADs are consistently completed within the timeframes prescribed by EEOC MD 110 and 29 C.F.R. Part 1614. To ensure that legal counsel is given adequate time to conduct sufficiency reviews while still meeting regulatory timeframes.
Responsible Official	Director, Office of Civil Rights Assistant Director, Office of Civil Rights, Employment Complaints Resolutions Staff (ECRS) Office of General Counsel (OGC) Civil Rights and Finance Law Office (CRFLO)
Date Objective Initiated	March 1, 2011
Target Date for Completion of Objective	September 30, 2018

Planned Activities Toward Completion of Objective	Target Date
1. Staffing of the OCR Attorney-Advisor ensures priority for completing a minimum of 60% of the FAD docket within the required timeframes. Amended to: Staffing of the OCR Attorney-Advisor positions places priority on issuing a minimum of 60% of the FADs within the required timeframe.	June 30, 2018
2. Employment Complaints Resolution Staff (ECRS) will continue to utilize the newly created FAD Management Plan to assess the docket.	June 30, 2018
3. ECRS will utilize its Inter-Agency Agreements and Contractors to strategically reduce its active docket on a continual basis.	June 30, 2018

Report of Accomplishments and Modifications to Objective:

(PART G: Q-87) The increase in requests for FADs has outpaced the current staffing levels needed to draft, review and issue FADs.

Activity No. 1. OCR filled two attorney positions to draft FADs. The two attorneys are working on the FAD docket, but the Agency has not resolved cases to a minimum of 60% of the FAD docket by the end of FY 16. OCR believes there are opportunities to reduce the time to draft and review FADs. Therefore, OCR, with OGC, will plan a LEAN project to evaluate the processes to create a more efficient and timely workflow.

Activity No. 2. ECRS is in the process of revising and updating the FAD management plan.

Activity No. 3. ECRS is suspending the use of Interagency Government and contractors until completion of the LEAN project and the revision of the FAD management plan in Activity 1 and Activity 2 above.

Part H-2: Statement of Model Program Essential Element Deficiency

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 process for shared information and communication between those involved in recruitment to determine the cause of any identified triggers. The desired goal is to focus on recruitment efforts that will increase participation rates in the applicant pools.
Responsible Official	Principal Deputy Assistant Administrator, Office of Administration & Resources Management Director, Office of Civil Rights Director, Office of Human Resources Deputy Civil Rights Officials
Date Objective Initiated	November 1, 2013
Target Date for Completion of Objective:	December 31, 2018

Planned Activities Toward Completion of Objective	Target Date
<p>1. OCR will collaborate with the OARM 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>Amended to: OCR will collaborate with the OARM to identify an alternative method(s) or tool that will allow the Agency to examine the hiring processes in major occupations where lower-than-anticipated application, qualification, and selection rates are identified.</p>	December 31, 2018
<p>2. a. OCR will collaborate with the OARM and Shared Service Centers to assess whether EPA position descriptions accurately reflect the job duties of major occupations, including those where lower-than-anticipated application, qualification, and selection rates are identified.</p> <p>b. OCR will also collaborate with OHR to evaluate the effectiveness of OHR's strategic recruitment plan and guidance document and make necessary modifications.</p>	December 31, 2018
<p>3. OCR will collaborate with OHR to evaluate the data from the Management Hiring Satisfaction Survey to determine whether there are any procedural triggers associated with the development of vacancy announcements and outreach efforts.</p>	December 31, 2018
<p>4. OCR will collaborate with the Office of Enforcement and Compliance Assurance (OECA), OGC, OHR, to create a process to collect, retain, and analyze applicant flow data for Series 0905 Attorney positions.</p>	December 31, 2018

Report of Accomplishments and Modifications to Objective:	Target Date
Although minor steps have begun, these items were placed on hold as a result of several office realignments and changes in leadership in FY 16. OHR/DRES D has the opportunity to conduct outreach and recruitment for a diverse applicant pool to staff and support the initiatives for FY 18.	

Part H-3: Standardize EEO Information Provided to New Employees and New Managers/Supervisors

Statement of Model Program Essential Element Deficiency:	(Part G: Q-3) Are new employees provided a copy of the EEO Policy Statement during orientation? Yes
Objective:	To streamline methods which convey EEO information (i.e., EEO related policies which include timely completion of No FEAR Act training) to new employees and employees promoted into the supervisory ranks.
Responsible Official:	Acting Administrator, Office of Administrator (OARM) Director, Office of Human Resources (OHR) Director, Diversity, Recruitment, & Employee Services Division (DRESD) Director, Office of Civil Rights (OCR) Assistant Director, Affirmative Employment, Analysis and Accountability Program (AEAA)
Date Objective Initiated:	January 1, 2015
Target Date for Completion of Objective:	September 30, 2018

Planned Activities Toward Completion of Objective:	Target Date (Must Be Specific)
1. OHR, Program Management Officers, EEO Officers and Area Lab Managers will ensure that new employees complete the required No FEAR Act training within their first 90 days.	September 30, 2017
2. OHR will assist Program Management Officers, EEO Officers and Area Lab Managers in creating a method to electronically track and monitor new employees' completion of the online No FEAR Act training.	September 30, 2018

Report of Accomplishments and Modifications to Objective:

EPA continued to ensure that new employees and employees promoted into the supervisory ranks are provided a copy of the EEO Policy Statement during orientation. In addition, EPA took a proactive step to further ensure additional EEO related awareness such as No FEAR Act training is completed in a timely manner.

Activity No. 1. In the biennial year (FY 16) of the No FEAR Act, 99.4% of the employees participated in the mandatory training. New employees were required to complete the online No FEAR Act training within their first 90 days of onboarding with 63.39% of the 620 new EPA employees complying; 30.88%, of the new employees missed the 90-day requirement but did complete the training within FY 16. The remaining 5.73% did not complete the training in FY 16.

ACTION: EPA will take steps to increase new employee completion rates by 30% to meet the 90-day requirements and to train 100% of new employees in their first 90 days.

Activity No. 2. Tracking participation in No FEAR Act training is time consuming because of the lack of a standard methodology. EPA is exploring options for a standard methodology

ACTION: OHR in coordination with OCR, will establish criteria for the agency's Skillport to interface with its Datamart employee records (i.e., new employees) to enhance scheduling, tracking and reporting of participation in the No FEAR Act training by new employees.

Part H-4: Increase Hispanic/Latino Participation at the GS-12 through SES Levels

Statement of Model Program Essential Element Deficiency:	In accordance with the Executive Order 13583, <i>Establishing a Coordinated Government-wide Initiative to Promote Diversity and Inclusion in the Federal Workforce</i> , the Agency will analyze data for Hispanic/Latino employees and applicants, to identify possible triggers and barriers related to retention and upward mobility for GS-12 through SES.
Objective:	Identify triggers and potential barriers to Hispanic/Latino employees where there is a less than anticipated participation rates at the GS-12 through Senior Executive Service (SES) levels.
Responsible Official:	Acting Assistant Administrator, Office of Administration & Resource Management (OARM) Director, Office of Human Resources (OHR) Director, Diversity, Recruitment, & Employee Services Division (DRESO) Director, Office of Civil Rights (OCR) Assistant Director of the Office of Civil Rights, Affirmative Employment Analysis and Accountability Program
Date Objective Initiated:	January 18, 2017
Target Date for Completion of Objective:	January 31, 2018

Planned Activities Toward Completion of Objective:	Target Date (Must Be Specific)
1. OCR, along with OARM and Shared Service Centers will implement a strategy to address the EEOC's Hispanic Council on Federal Employment (HCFE) Memo to Heads of Executive Departments and Agencies on Hispanics in the federal workforce, specifically requiring annual trigger and barrier analysis be reported in the FY 17 MD-715 on Hispanics/Latinos.	January 31, 2018
2. OCR, along with OARM, OHR, DRESO and the Shared Service Centers, will conduct a root cause analysis and summarize recruitment outreach events focused on Hispanic/Latino populations as required in EEOC's guidance on HCFE Barrier Analysis.	September 30, 2017
3. OCR, along with OARM, OHR, DRESO and the Shared Service Centers, will conduct a thorough analysis of the applicant flow showing representation of Hispanics at each stage of the recruitment /hiring process compared to the overall Agency applicant flow.	November 30, 2017
4. OCR, along with OARM, OHR, and DRESO, will conduct analysis of Hispanic/Latino representation at the GS-12 through SES level compared to corresponding CLF and Agency benchmarks; and career tracks leading to SES (internal and external).	November 30, 2017

5. OCR, along with OARM, OHR, DRES D and the Shared Service Centers, will conduct root cause analysis on recruitment as required in EEOC's guidance on HCFE Barrier Analysis (e.g. recruitment plan).	November 30, 2017
6. OCR, along with OARM, OHR, DRES D and the Shared Service Centers, will conduct root cause analysis on hiring as required in EEOC's guidance on HCFE Barrier Analysis (e.g., selection process accountability, hiring goal for persons with targeted disabilities).	November 30, 2017
7. OCR, along with OARM, OHR, DRES D and the Shared Service Centers, will conduct root cause analysis on training and development as required in EEOC's guidance on HCFE Barrier Analysis. (e.g., requirements for Individual Development Plans; participation in leadership development programs by individuals of Hispanic ethnicity, compared to overall employee participation).	November 30, 2017
8. OCR, along with OARM, OHR, DRES D and the Shared Service Centers, will conduct analyses on promotions as required in EEOC's guidance on HCFE Barrier Analysis (e.g., collection of demographics on internal promotions; review the promotion process periodically to ensure equal treatment for protected EEO groups).	November 30, 2017
9. OCR, along with OARM, OHR, DRES D and the Shared Service Centers, will conduct analyses on separations as required in EEOC's guidance on HCFE Barrier Analysis. (e.g., agency policies requiring exit interviews; involuntary/voluntary separations.)	November 30, 2017
10. OCR, along with OARM, OHR, and DRES D, will analyze the most recent Federal Employment Viewpoint Survey by demographics to determine where further investigation is required.	November 30, 2017
11. OCR, along with OARM, OHR, and DRES D, will develop strategies to strengthen pipelines and improve retention and upward mobility for Hispanic employees (e.g., narrative on targeted outreach, internships, mentoring, rotational assignments, awards/recognitions, and leadership accountability measures).	November 30, 2017
12. OCR, along with OARM, OHR, and DRES D, will develop a summary of best practices that resulted in the success or improvement in Hispanic employment, retention programs, and promotion opportunities.	November 30, 2017

Report of Accomplishments and Modifications to Objective:

To be determined.

Part I: EEO Plan to Eliminate Identified Barrier

Part I-1: Applicants and New Hires for Major Occupations

<p>Statement of Condition That Was a Trigger for A Potential Barrier:</p> <p>Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?</p>	<p>Analysis of 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>Barrier Analysis:</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 new hires (Table A7) for employees in six of seven of its major occupations and the RCLF. In addition, EPA conducted a four-year trend analysis for FY 2013-2016. Although the comprehensive list of FY 16 RNO and sex groups with triggers is provided in the table below, selected trends are highlighted as illustrations.</p> <p>The seven major occupations are:</p> <ol style="list-style-type: none"> 1. 0028 Environmental Protection Specialist, 2. 0301 Miscellaneous Administrative and Program Specialist, 3. 0343 Management/Program Analyst, 4. 0401 General Biological Science (Research), 5. 0819 Environmental Engineer (Research), 6. 0905 General Attorney, and 7. 1301 Physical/Environmental Scientist (Research). <p>Although 0905 General Attorneys constitute one of EPA's major occupations, RNO and sex data is not tracked due to the unique selection process for excepted service positions. EPA is developing a process to collect this data in accordance with EEOC MD-715 guidance. In FY 16, the OCR along with the OGC collected preliminary data; however, the data was too limited for comprehensive analysis.</p> <p>Application</p> <p>The following narrative provides an analysis of multi-year trends associated with new hires.</p> <p>EPA identified application rate triggers by comparing the RCLF and application rates of those who self-identified (Table A7) their race/ethnicity and sex.</p> <p>In FY 15 and 16, White males have applied for positions at rates lower than their representation in the RCLF in every major occupation series. For the fourth year in a row, White males have applied for positions at rates lower than their representation in the RCLF in four major occupations:</p> <ol style="list-style-type: none"> 1. 0028 Environmental Protection Specialist; 2. 0343 Management/Program Analyst; 3. 0401 General Biological Science; and 4. 0819 Environmental Engineer.

Similarly, White females, for the fourth year in a row, have applied for positions at rates lower than their representation in the RCLF in three major occupations:

1. 0301 Miscellaneous Administration and Program Specialist;
2. 0343 Management/Program Analyst; and
3. 0401 General Biological Science.

However, even though the application rates for White males was under their representation RCLF, the rates increased overall from FY 15 to FY 16 in four major occupation series (0028, 0343, 0819, 1301). Application rates also increased for White females in these same occupations.

New application rate triggers were identified for White females (1301); Asian males (0301); Asian females (1301); and two or more race males (0401, 0819).

The following chart provides the FY16 triggers relative to new hires based on MD-715 Tables A7 and A8 for the specific RNO and sex groups that applied for major occupation positions at rates lower than their representation in the RCLF:

Applicants (Voluntarily self-identified)

Race, National Origin and Sex	Occupational Series
White Males	0028, 0301, 0343, 0401, 0819, 1301
White Females	0301, 0343, 0401, 1301
Asian Females	1301
Asian Males	0301
Native Hawaiian or Other Pacific Islander Females	0819
Two or More Races Males	0401, 0819

EPA will use the triggers to examine whether barriers to equal employment opportunity exist. EPA will further examine whether there are Agency policies, practices or procedures that may cause certain RNO and sex groups to apply at rates less than anticipated rates for major occupation positions. EPA has several activities, which are detailed within the planned activities below, to identify a potential cause of the triggers. After the planned activities are completed, EPA will evaluate the impact on 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. It must be noted that these tables refer to the Basic Qualifications generated through Monster.gov and not the more detailed evaluation of qualifications conducted at the Agency's Shared Service Centers. Overall triggers associated with the qualification rates decreased in FY 16, as only four five qualification triggers were identified.

The following chart provides the FY16 triggers pertaining to RNO and sex groups for applicants that were qualified for major occupation positions at rates lower than their application rates based on MD-715 tables A7/A8:

Race, National Origin and Sex	Occupational Series
White Males	0028, 0301
Black Males	0343
American Indian or Alaska Native Females	1301

EPA is evaluating methods to improve the data collection to examine the standards applied to EPA applicants to major occupations, deemed Best Qualified, and referred to management for selection. Improving the analysis of the qualifications that result in a certificate will allow EPA to identify any potential barriers to equal employment opportunity.

Selection

The following narrative provides an analysis of multi-year trends associated with new hires.

EPA identified selection rate triggers by comparing the qualification and selection rates (Table A7) of the respective populations.

An increase of triggers associated with the selection rates of Hispanic Males and Females, White Females, Black Males and Females, and Asian Females has been identified in FY 16. In FY 16, the following selection rate triggers were present: 1) Hispanic Males in the 0401 General Biological Science and 0819 Environmental Engineer occupational series; 2) Hispanic Females in the 0028 Environmental Protection Specialist, 0343 Management/Program Analyst, and 0819 Environmental Engineer occupational series; 3) White Females in the 0819 Environmental Engineer, and 1301 Physical Scientist occupational series; 4) Black Males in the 0343 Management/Program Analyst occupational series; 5) Black Females in the 0301 Miscellaneous Administration and Program Specialist and 1301 Physical Scientist occupational series; and 6) Asian Females in the 0401 General Biological Science occupational series.

When looking at a 5-year trend analysis on selection rates, triggers have been identified for the fourth consecutive year in the following:

- Hispanic Males in the 0301 Miscellaneous Administration and Program Specialist series;
- White Males in the 0301 Miscellaneous Administration and Program Specialist series;
- Black Males in the 0028 Environmental Protection Specialist and 0819 Environmental Engineer series;
- Asian Males in the 0028 Environmental Protection Specialist and 1301 Physical Scientist series;
- Asian Females in the 0301 Miscellaneous Administration and Program Specialist series;
- Native Hawaiian/Pacific Islander Males in the 0028 Environmental Protection Specialist series;

- Native Hawaiian/Pacific Islander Females in the 0028 Environmental Protection Specialist and 0343 Management/Program Analyst series;
- American Indian/Alaska Native Males in the 0028 Environmental Protection Specialist, 0301 Miscellaneous Administration and Program Specialist and 0343 Management/Program Analyst series; and,
- American Indian/Alaska Native Females in the 0301 Miscellaneous Administration and Program Specialist; 0401 General Biological Science, 0819 Environmental Engineer, and 1301 Physical Scientist occupational series.

In contrast, the triggers associated with the selection rates of White Males decreased in FY 16. From FY 15 to 16, the selection rates of White Males for positions in the 0401 General Biological Science occupational series increased from 22.20% to 31.90%; the 0819 Environmental Engineer occupational series, increased from 26.20% to 43.50%; and the 1301 Physical Scientist occupational series increased from 21.10% to 51.40%.

The following chart provides the FY16 triggers pertaining to specific RNO and sex groups that were selected for major occupation positions at rates lower than their qualification rates:

Race, National Origin and Sex	Occupational Series
Hispanic Males	0301, 0343, 0401, 0819, 1301
Hispanic Females	0028, 0343, 0819
White Males	0301, 0343
White Females	0819, 1301
Black Males	0028, 0343, 0401, 0819
Black Females	0301, 0819, 1301
Asian Males	0028, 0301, 0343, 0401, 1301
Asian Females	0028, 0301, 0401
Native Hawaiian or other Pacific Islander Males	0028, 0343
Native Hawaiian or other Pacific Islander Females	0028, 0301, 0343, 0401
American Indian or Alaska Native Males	0028, 0301, 0343, 0401, 0819, 1301

	American Indian or Alaska Native Females	0301, 0343, 0401, 0819, 1301
	Two or More Races Males	0028, 0301, 0343, 0401, 0819, 1301
	Two or More Races Females	0028, 0301, 0343, 0819, 1301
<p>EPA will use these triggers to examine whether barriers to equal employment opportunity exist. EPA will further examine whether there are Agency policies, practices or procedures that may cause certain RNO and sex groups to be selected at rates less than anticipated for major occupation positions. EPA has activities, which are detailed within the planned activities below, to identify a potential cause of the triggers. After the planned activities are completed, EPA will evaluate the impact on the triggers noted above.</p>		

<p>Statement of Identified Barrier:</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>EPA has not identified a barrier in FY 16, but continues the process of barrier analysis to identify the root cause of any of the identified lower-than-expected participation rates.</p> <p>In FY 16, EPA implemented the following planned activities to determine a root cause of the less-than-anticipated application, qualification, and selection rates: 1) provided Agency-wide SEPM training related to diversity, inclusion and equal employment opportunities; 2) created a tool to track centrally coordinated recruitment activities; and 3) incorporated relevant civilian labor force data into the Diversity Dashboard to increase the utilization of the Diversity Dashboard in developing and monitoring the effectiveness of targeted outreach strategies.</p> <p>EPA's application, qualification, and selection rates suggest that EPA should examine the selection process for major occupational series to determine whether any Agency policy, practice or procedure is causing lower than anticipated selection rates for certain RNO and sex groups.</p>
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<p>Objective:</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 hiring process, including recruitment, qualification and selection, associated with the identified lower-than-expected participation rates for several occupational series.</p>
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<p>Responsible Officials:</p>	<p>Acting Assistant Administrator, Office of Administration & Resources Management</p> <p>Director, Office of Human Resources</p> <p>Director, Office of Civil Rights</p> <p>Deputy Civil Rights Officials</p>
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Date Objective Initiated:	February 15, 2011
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Target Date for Completion of Objective:	September 30, 2018
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Planned Activities Toward Completion of Objective:	Target Date (Must Be Specific)
<p>1. OCR will collaborate with OARM to develop a management hiring satisfaction survey to examine the hiring processes in major occupations where lower-than-anticipated application, qualification, and selection rates are identified.</p> <p>Amended to: OCR will collaborate with OARM to identify an alternative method(s) or tool(s) that will allow the Agency to examine the hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified.</p>	September 30, 2018
<p>2. OCR will collaborate with OARM management to assess whether EPA position descriptions accurately reflect the job duties of major occupations where lower than anticipated application, qualification, and selection rates are identified.</p> <p>Amended to: OCR will collaborate with the OARM and Shared Service Centers to assess whether EPA position descriptions accurately reflect the job duties of major occupations where lower-than-anticipated application, qualification, and selection rates are identified.</p>	September 30, 2018
<p>3. OCR will collaborate with OHR to evaluate the effectiveness of its strategic recruitment plan and guidance document and make necessary modifications or changes.</p>	September 30, 2018
<p>4. OHR will coordinate and collaborate with OCR 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>Amended to: OHR will coordinate and collaborate with OCR to evaluate the data from the identified alternative method(s) or tool(s) that will allow the Agency to examine its hiring process to determine whether there are any procedural barriers associated with the development of vacancy announcements and outreach efforts.</p>	September 30, 2018
<p>5. OCR 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 those positions.</p>	September 30, 2018

Report of Accomplishments and Modifications to Objective:
EPA observed some changes in the application, qualification, and selection rates of certain RNO and sex groups in FY 16. Specifically, the triggers associated with the application rates of Hispanic Males, Hispanic Females, and American Indian

Report of Accomplishments and Modifications to Objective:

Males, and qualification rates of White Males and American Indian Females, were not present in FY 16. During that same period, the selection rates of Hispanic Males, Asian Males, and Asian Females increased in FY 16.

The accomplishments below are numbered to correspond with the planned activity.

Activity No 1. OCR's efforts to examine the hiring processes in major occupations will continue. OCR examines EPA hiring processes annually. In FY 16, the following steps were included:

- Analyzed data to identify and determine which Regions had hired the most major occupation positions;
- Worked with the Regions and hiring officials to obtain hiring information.
- Retrieved new hire data to identify the series, grade and office of the new hires.
- Reviewed and streamlined survey questions that were developed for the manager's survey.
- Collaborated with OARM and other offices to identify most recent hires.
- Further collaboration is expected with OARM.

OCR's efforts to examine the hiring process continue; therefore, the planned activity was amended and extended.

Activity No 2. Clarity to the Task Defined: EPA's SSCs continue to update their archives of position descriptions including major occupations. There was an error in the planned activity requiring correction in FY 16. The correction restates the activity as follows: OCR will collaborate with OARM to assess whether position descriptions accurately reflect the job duties of major occupations where lower than anticipated application, qualification, and selection rates are identified.

Activity No 3. OCR and OHR along with the SSC continued to draft and develop a management hiring survey that can be presented to senior management across the agency. Several questions have been drafted. However, due to several office realignments, this activity has been placed on hold and an alternative method or tool for examining the hiring process is scheduled to be completed in FY 18.

Activity No 4. Although steps were taken in FY 16, target dates for activity No. 4 were re-evaluated to accommodate several office realignments and changes in OHR/DRESO leadership.

Activity No 5. OCR collaborated with OGC to assess methods of collecting application, qualification, and selection rates by RNO for Attorney 0905 series. OGC to date has piloted two job announcements through USA Jobs, giving OCR the ability to successfully collect the application and qualification rates. OCR and OGC will continue to assess the reliability of this data collection method to meet the FY 18 goal.

Part I: EEO Plan to Eliminate Identified Barrier

Part I-2: Internal Competitive Promotions

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?

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.

Barrier Analysis:

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

EPA reviewed the statistical data associated with internal competitive promotions (Table A9) for employees in six of seven major occupations and the participation rates for the same 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 13 - FY 16. Although the exhaustive list of triggers is provided in each personnel transaction section, certain triggers were highlighted for illustrative purposes

Application

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 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.

In FY 16, overall application rate triggers decreased compared to FY 15 for Asian Males and Females, Native American Females, and Two or More Races Males and Females.

However, the application rates for White Males, White Females, and American Indian/ Alaska Native Females remained lower than anticipated. Specifically, for the fourth year, White Males had application rate triggers in four major occupations series: 0028 Environmental Protection Specialist; 0343 Management/Program Analyst; 0401 General Biological Science (Research); 0819 Environmental Engineer. Although triggers are still present, application rates increased in the four afore-mentioned occupation series compared to FY 15.

Source: Table A6 and Table A9

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

Applicants (Voluntarily self-identified)

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

EPA will examine whether barriers to equal employment opportunity exist using the afore-mentioned triggers. EPA will analyze whether there are Agency policies, practices or procedures that may cause certain RNO and sex groups to apply for promotions in major occupations at rates that are less than anticipated. EPA has planned activities, which are detailed below to identify a potential cause of the afore-mentioned triggers. After the planned activities are completed, EPA will evaluate the impact on 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 16, the qualification rate triggers increased compared to FY 15, while nine triggers are no longer present, 14 new triggers appeared in FY 16.

In FY 16, the following qualification rate triggers were present: 1) Hispanic Males in the 0028 Environmental Protection Specialist occupational series; 2) Hispanic Females in the 0343 Management/Program Analyst occupational series; 3) White Males in the 0301 Miscellaneous Administration and Program Specialist, and 0401 General Biological Science occupational series; 4) Black Males in the 0819 Environmental Engineer occupational series; 5) Asian Males in the 0301 Miscellaneous Administration and Program Specialist, and 0401 General Biological Science occupational series; 6) American Indian Females in the 0343 Management/Program Analyst, 0819 Environmental Engineer, and 1301 Physical Scientist occupational series; and 7) Two or More Races Male in the 0028 Environmental Protection Specialist, 0301 Miscellaneous Administration and Program Specialist, and 0401 General Biological Science occupational series.

Source: Table A6 and Table A9

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

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

EPA will examine whether barriers to equal employment opportunity exist using the afore-mentioned triggers. EPA will further determine whether there are Agency policies or practices that may cause certain race/national origin and sex groups to be deemed qualified at rates that are less than their application rate for major occupation internal promotions. EPA has planned activities, which are detailed below, to identify a potential cause of the afore-mentioned triggers. After the planned activities are completed, EPA will evaluate the impact on 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 16, the selection rates of White Males were higher than their qualification rates in all major occupations except 0301 Miscellaneous Administration and Program Specialist. However, in FY 15, White males had selection rate triggers in four major occupations. Moreover, triggers associated with the qualification rates of Asian Males and Females decreased from FY 15 to FY 16.

For the third year in a row, triggers associated with the selection rates have existed for the following:

- 1) Hispanic Males in the 0819 Environmental Engineer;
- 2) White Males in the 0301 Miscellaneous Administration and Program Specialist;
- 3) Black Males in the 0301 Miscellaneous Administration and Program Specialist;
- 4) Asian Males in the 0343 Management/Program Analyst;
- 5) Asian Females in the 0401 General Biological Science; and
- 6) American Indian Males in the 0028 Environmental Protection Specialist and 0401 General Biological Science occupational series.

Source: Table A6 and Table A9

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:

	<table><tr><th>Race, National Origin and Sex</th><th>Occupational Series</th></tr><tr><td>Hispanic Males</td><td>0301, 0343, 0819</td></tr><tr><td>Hispanic Females</td><td>0028, 0343, 0819, 1301</td></tr><tr><td>White Males</td><td>0301</td></tr><tr><td>White Females</td><td>0819, 1301</td></tr><tr><td>Black Males</td><td>0028, 0301, 0343, 0401</td></tr><tr><td>Black Females</td><td>0028, 0343, 0819, 1301</td></tr><tr><td>Asian Males</td><td>0028, 0343, 0401</td></tr><tr><td>Asian Females</td><td>0028, 0401</td></tr><tr><td>Native Hawaiian Males</td><td>0301, 0343</td></tr><tr><td>Native Hawaiian Females</td><td>0028</td></tr><tr><td>American Indian Males</td><td>0028, 0301, 0401, 0819</td></tr><tr><td>American Indian Females</td><td>0301, 0343, 0401</td></tr><tr><td>Two or More Races Males</td><td>0028, 0343</td></tr><tr><td>Two or More Races Females</td><td>0301, 0343, 0401, 0819, 1301</td></tr></table>	Race, National Origin and Sex	Occupational Series	Hispanic Males	0301, 0343, 0819	Hispanic Females	0028, 0343, 0819, 1301	White Males	0301	White Females	0819, 1301	Black Males	0028, 0301, 0343, 0401	Black Females	0028, 0343, 0819, 1301	Asian Males	0028, 0343, 0401	Asian Females	0028, 0401	Native Hawaiian Males	0301, 0343	Native Hawaiian Females	0028	American Indian Males	0028, 0301, 0401, 0819	American Indian Females	0301, 0343, 0401	Two or More Races Males	0028, 0343	Two or More Races Females	0301, 0343, 0401, 0819, 1301
	Race, National Origin and Sex	Occupational Series																													
	Hispanic Males	0301, 0343, 0819																													
	Hispanic Females	0028, 0343, 0819, 1301																													
	White Males	0301																													
	White Females	0819, 1301																													
	Black Males	0028, 0301, 0343, 0401																													
	Black Females	0028, 0343, 0819, 1301																													
	Asian Males	0028, 0343, 0401																													
	Asian Females	0028, 0401																													
	Native Hawaiian Males	0301, 0343																													
	Native Hawaiian Females	0028																													
	American Indian Males	0028, 0301, 0401, 0819																													
	American Indian Females	0301, 0343, 0401																													
	Two or More Races Males	0028, 0343																													
Two or More Races Females	0301, 0343, 0401, 0819, 1301																														
<p>EPA will examine whether barriers to equal employment opportunity exist using the afore-mentioned triggers. EPA will determine whether there are Agency policies or practices that may cause certain race/national origin and sex groups to be selected at rates that are less than their qualification rate for major occupation internal promotions. EPA has planned activities, which are detailed below to identify a potential cause of the afore-mentioned triggers. After the planned activities are completed, EPA will evaluate the impact on the triggers noted above.</p>																															

<p>Statement of Identified Barrier:</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>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 16, EPA implemented several initiatives to foster a work environment that nurtures and advances the talents, drive, and interests of all employees to determine what may have caused the less than anticipated application, qualification, and selection rates.</p> <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 0819 Environmental Engineer occupational series to determine whether any Agency policy, practice or procedure is causing certain race/national origin and sex groups less than anticipated application rates; 2) its qualification policies and practices for the 0028 Environmental Protection Specialist, 0819 Environmental Engineer, and 1301 Physical Scientist occupational</p>
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	series to determine whether any Agency policy, practice or procedure is causing certain race/national origin and sex groups less than anticipated qualification rates; and 3) its selection policies and practices for all major occupational series to determine whether any Agency policy, practice or procedure is causing certain race/national origin and sex groups less than anticipated selection rates for positions.
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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 application, qualification and selection policies and practices associated with the above-identified lower-than-expected qualification and selection rates for several occupational series.
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Responsible Officials:	Acting Assistant Administrator, Office of Administration & Resources Management Director, Office of Civil Rights Director, Office of Human Resources Deputy Civil Rights Officials
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Date Objective Initiated:	February 15, 2011
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Target Date for Completion of Objective:	September 30, 2018
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Planned Activities Toward Completion of Objective:	Target Date (Must Be Specific)
1. OCR will collaborate with OARM to identify an alternative method(s) or tool(s) which allow the Agency to examine the hiring processes in major occupations where lower-than-anticipated application, qualification, and selection rates are identified.	September 30, 2018
2. OCR will collaborate with the OARM to create a tool or process to collect relevant applicant pool data.	Completed September 2016
3. OARM will regularly provide OCR with OPM data from quarterly management hiring satisfaction surveys to review against any potential barrier associated in the hiring process.	September 30, 2018

<p>4. OCR will collaborate with OARM to evaluate the effectiveness of its strategic recruitment plan and guidance document and make necessary modifications or changes.</p> <p>Amended to: The DRESO through OHR will evaluate the effectiveness of the Agency's national strategic recruitment plan and guidance document to make necessary modifications or changes that will target less than expected participation rates.</p>	September 30, 2018
<p>5. OCR 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>	September 30, 2018
<p>6. OCR will collaborate with OARM to create a tool to assess effectiveness of career development activities.</p>	September 30, 2018

Report of Accomplishments and Modifications to Objective:

The accomplishments below are numbered to correspond with the planned activity.

Activity No 1. OCR's efforts to examine the hiring processes in major occupations continued in FY 16. Further steps were achieved as follows:

- Analyzed data to identify Regions with the highest hiring rates related to EPA's major occupations;
- Collaborated with Regions and most hiring officials to obtain hiring information.
- Retrieved new hires data to identify the series, grade and office of the new hires.
- Reviewed and streamlined survey questions that were developed for the manager's survey.
- Collaborated with OARM and other offices to identify most recent hires.
- Further collaboration is expected with OARM.

OCR's efforts to examine the hiring process continues, therefore, the planned activity was amended and extended.

Activity No 2. COMPLETED OCR collaborated with Region 7 in obtaining RCLF data for each program office and Region to use in their recruitment efforts during FY 16. OCR will work with Region 7 to continue this effort for future recruitments.

Activity No 3. OHR/DRESO and SSC will extend the activity period as ongoing. As an alternative to developing an internal hiring survey, the Agency will consider the use of OPM's Federal-wide hiring survey broken down by agency to conduct analysis on the hiring process quarterly.

Activity No 4. Because of several office realignments and changes in leadership, this activity continues as new leadership of the OHR and DRESO programs assess the Agency's needs, triggers and required direction. In the second quarter of FY 17, OCR and OHR plan to schedule a meeting to identify triggers that will lead to a potential barrier analysis.

Activity No 6. OCR collaborated with OGC to assess methods of collecting application, qualification, and selection rates by RNO for Attorney 0905 series. OGC, to date, has piloted two job announcements through USAJobs, resulting in the ability for OCR to successfully collect the application and qualification rates. OCR and OGC will continue to assess the reliability of this data collection method to meet the FY 17 goal.

Part I: EEO Plan to Eliminate Identified Barrier

Part I-3: Senior Grades

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?

Data comparisons between the respective feeder pools (one grade below the grade being analyzed) and application, qualification, and selection rates revealed instances of lower-than-expected application, qualification and/or selection rates.

Barrier Analysis:

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

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/national origin 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 13 - FY 16. Although the exhaustive list of triggers is provided in each personnel transaction section, certain triggers were highlighted for illustrative purposes, but not because they were more important or worse than other triggers.

Application

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.

Triggers associated with the application rates of White Females, and Black Females have remained consistent from FY 13 to FY 16. Specifically, the following application rate triggers have been present since FY 13: 1) White Females at the GS 13, 14, and 15 levels; and 2) Black Females at the GS 13 level.

While triggers for White Females were identified for consecutive years, their application rates increased in FY 16 from FY 15 at every senior grade level. Specifically, White Female application rates at the GS 14 increased from 15.40% to 20.60% and at the GS 15 increased from 12.10% to 23.80%.

For the first time, the application rates decreased at every senior grade level for Hispanic Males. However, that decrease did not create a trigger in their application rates.

The following chart details the specific RNO and sex groups that applied for senior grade positions at rates lower than their representation in the relevant feeder pool:

Applicants (Voluntarily self-identified)

Race, National Origin and Sex	Occupational Series
White Males	GS 14, GS 15
White Females	GS 13, GS 14, GS 15
Black Females	GS 13, GS 14, GS 15

Native Hawaiian Males	GS 15
Native Hawaiian Females	GS 15
American Indian Females	GS 15
Two or More Races Males	GS 13, GS 14
Two or More Races Females	GS 13

EPA will examine whether barriers to equal employment opportunity exist using these triggers. EPA will assess whether there are Agency policies, practices or procedures that may cause certain RNO and sex groups to apply for senior grade positions at rates that are less than anticipated. EPA has planned activities, which are detailed below, to identify a potential cause of these triggers. After the planned activities are completed, EPA will evaluate the impact on 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. Triggers in anticipated rates of participation at the qualification stage for White Males, and Black Males have remained consistent from FY 13 to FY 16. The following triggers have been present since FY 2013: 1) White Males at the GS 15 level; and 2) Black Males at the GS 14 and 15 levels.

Similarly, in FY 15 and 16, qualification rates of Hispanic Males at the GS 13 and 14 levels, as well as White Males at the GS 13 level, were below their application rates.

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

Grades

Race, National Origin and Sex	Grade
Hispanic Males	GS 13, GS 14
White Males	GS 13, GS 14, GS 15
Black Males	GS 13, GS 14, GS 15
Black Females	GS 15
Asian Males	GS 14, GS 15
Native Hawaiian Males	GS 13, GS 14
Two or More Races Males	GS 13, GS 14, GS 15

EPA will examine whether barriers to equal employment opportunity exist using these triggers. EPA will further assess whether there are Agency policies, practices, or procedures that may cause certain RNO and sex groups to be qualified for Senior Grade positions at rates that are less than anticipated. EPA has planned activities, which are detailed below, to identify a potential cause of these triggers. After the

	<p>planned activities are completed, EPA will evaluate the impact on the triggers noted above.</p> <p>Selection</p> <p>For the senior grades, EPA identified selection rate triggers by comparing application and qualification rates (Table A11) of the respective populations. EPA experienced an increase in the selection rates at the senior grade levels for certain RNO and sex groups. For instance, the selection rates of Hispanic Females, Black Females and Asian Males exceeded their qualification rates at the GS 13 level as compared to FY 15.</p> <p>Additionally, in FY 16, selection rate triggers decreased from FY 15 for Asian Males at the GS 13 level and Hispanic Males, Black Females, and American Indian Females at the GS 14 level.</p> <p>The following chart details the specific RNO and sex groups that were selected at levels below their respective qualification rates:</p> <table border="1" data-bbox="597 730 1421 1413"> <thead> <tr> <th colspan="2">Race, National Origin and Sex</th></tr> </thead> <tbody> <tr> <td>Hispanic Males</td><td>GS 13, GS 15</td></tr> <tr> <td>Hispanic Females</td><td>GS 14, GS 15</td></tr> <tr> <td>Black Males</td><td>GS 13, GS 14, GS 15</td></tr> <tr> <td>Asian Males</td><td>GS 14</td></tr> <tr> <td>Asian Females</td><td>GS 14, GS 15</td></tr> <tr> <td>Native Hawaiian Males</td><td>GS 14</td></tr> <tr> <td>Native Hawaiian Females</td><td>GS 13, GS 14</td></tr> <tr> <td>American Indian Males</td><td>GS 13, GS 14, GS 15</td></tr> <tr> <td>American Indian Females</td><td>GS 13</td></tr> <tr> <td>Two or More Races Females</td><td>GS 13, GS 14, GS 15</td></tr> </tbody> </table> <p>EPA will examine whether barriers to equal employment opportunity exist using these triggers. EPA will assess whether there are Agency policies, practices or procedures that may cause certain RNO and sex groups to be selected for senior grade positions at rates that are less than anticipated. EPA has planned several activities, which are detailed below, to identify a potential cause of these triggers. After the planned activities are completed, EPA will evaluate the impact on the triggers noted above.</p>	Race, National Origin and Sex		Hispanic Males	GS 13, GS 15	Hispanic Females	GS 14, GS 15	Black Males	GS 13, GS 14, GS 15	Asian Males	GS 14	Asian Females	GS 14, GS 15	Native Hawaiian Males	GS 14	Native Hawaiian Females	GS 13, GS 14	American Indian Males	GS 13, GS 14, GS 15	American Indian Females	GS 13	Two or More Races Females	GS 13, GS 14, GS 15
Race, National Origin and Sex																							
Hispanic Males	GS 13, GS 15																						
Hispanic Females	GS 14, GS 15																						
Black Males	GS 13, GS 14, GS 15																						
Asian Males	GS 14																						
Asian Females	GS 14, GS 15																						
Native Hawaiian Males	GS 14																						
Native Hawaiian Females	GS 13, GS 14																						
American Indian Males	GS 13, GS 14, GS 15																						
American Indian Females	GS 13																						
Two or More Races Females	GS 13, GS 14, GS 15																						

<p>Statement of Identified Barrier:</p> <p>Provide a succinct statement of EPA policy, procedure or practice that has been determined to be</p>	<p>EPA evaluates whether any specific Agency policy, practice, or procedure is causing any of the identified lower than expected participation rates. In FY 16, EPA implemented several initiatives to foster a work environment that nurtures and advances the talents, drive, and interests of employees to determine what may have caused the less than anticipated application, qualification, and selection rates.</p>
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the barrier of the undesired condition.	EPA's application, qualification, and selection rates suggest that it should examine: 1) its solicitation and career development policies, practices and procedures for the GS 13 level to determine whether any Agency policy, practice or procedure is causing less than anticipated application rates for certain RNO and sex groups; 2) its qualification policies and practices for the GS 13 level to determine whether any Agency policy, practice or procedure is causing less than anticipated qualification rates for certain RNO and sex groups; and 3) its selection policies and practices for the GS 13, GS 14, and GS 15 level to determine whether any Agency policy, practice or procedure is causing less than anticipated selection rates for certain RNO and sex groups' positions.
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Objective: State the alternative or revised Agency policy, procedure or practice to be implemented to correct the undesired condition.	To identify potential barriers, EPA will analyze the application, qualification and selection policies and practices associated with the above-identified less than anticipated application, qualification and selection rates for several occupational series.
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Responsible Officials:	Acting Assistant Administrator, Office of Administration and Resources Management Director, Office of Human Resources Director, Office of Civil Rights Deputy Civil Rights Officials
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Date Objective Initiated:	February 15, 2011
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Target Date for Completion of Objective:	September 30, 2018
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Planned Activities Toward Completion of Objective:	Target Date (Must Be Specific)
<p>1. OCR will collaborate with OARM to develop a management hiring satisfaction survey to examine the hiring processes in major occupations where lower-than-anticipated application, qualification, and selection rates are identified.</p> <p>Amended to: OCR will collaborate with OARM to identify an alternative method(s) or tool(s) which allows the Agency to examine the hiring processes in major occupations where lower-than-anticipated application, qualification, and selection rates are identified.</p>	September 2018

2. OCR will collaborate with OARM to create a tool or process to collect relevant applicant pool data.	September 30, 2018
3. OHR will coordinate and collaborate with OCR to evaluate the data from the examination of the hiring process to determine whether there are any procedural barriers associated with the development of vacancy announcements and outreach efforts.	September 30, 2018
4. OCR will collaborate with the 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 30, 2018
5. OCR will collaborate with OARM to create a tool or process to assess effectiveness of career development activities.	September 30, 2018
6. OCR will collaborate with OARM to create a tool or process to evaluate the distribution of awards.	September 30, 2018

Report of Accomplishments and Modifications to Objective:

The accomplishments below are numbered to correspond with the planned activity.

Activity No 1. OCR efforts to examine the hiring processes in major occupations will continue. In FY 16, OCR has taken further steps to examine the hiring processes which are ongoing.

The following steps are being taken:

- Analyzing data to identify and determine which Regions have hired the most major occupation positions;
- Working with the Regions and most hiring officials to obtain hiring information.
- Retrieving new hire data to identify the series, grade and office of the new hires.
- Reviewing and streamlining survey questions that were original developed for the proposed manager's survey.
- Collaborating with OARM and other offices to identify most recent hires.

OCR's efforts to examine the hiring process continue, therefore, the planned activity was amended and extended.

Activity No 3. OHR/DRESO, SSC, along with OCR, consider alternatives to developing an internal hiring process survey. The Agency will also consider the use of OPM's Federal-wide hiring survey broken down by agency, to conduct quarterly analysis on the hiring process.

Activity No 5. OARM, as lead, continued to explore learning management systems to expand its means of tracking activities, to include career development; however, in FY 16 due to organizational changes, this priority was extended to FY 18. OCR and DRESO will continue to collaborate on this initiative.

Activity No 6. OCR collaborated with OGC to develop methods of collecting application, qualification, and selection rates by RNO for Attorney 0905 series. OGC, to date, has piloted two job announcements through USAJobs, giving OCR the ability to successfully collect this data. OCR and OGC will continue to assess the reliability of this data collection method to meet the FY 18 goal.

Part I: EEO Plan to Eliminate Identified Barrier

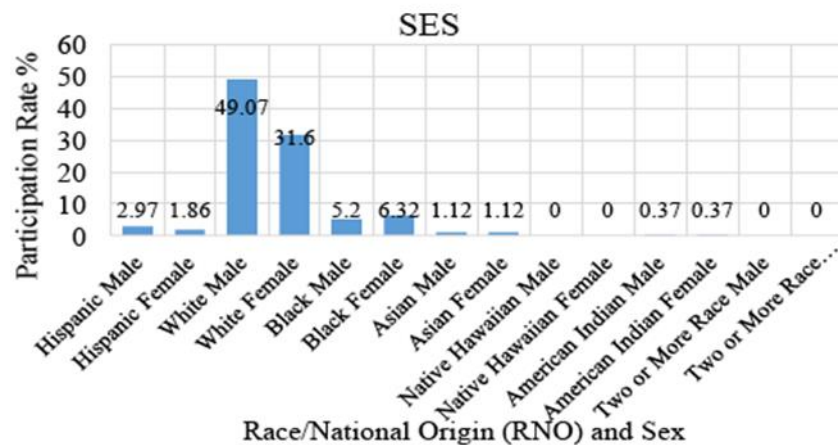
Part I-4: Senior Executive Service (SES)

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 SES workforce.

NOTE: Internal applicants are members of the SES or SES Candidate Development Program graduates. The Agency collected the FY 16 workforce participation rates for the SES, which are graphically represented below.



Barrier Analysis:

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

In FY 11, the Agency launched a system to collect applicant flow data related to external applicants for SES vacancies. The process for when selections are made includes a retrospective analysis of applicant flow. Determinations on best qualified candidates were conducted and reported.

The Agency must collect and analyze detailed information on internal applicants to SES vacancies before it can determine whether any policy, practice or procedure has caused the participation rates illustrated above for the SES workforce data.

EPA has planned several activities to promote our examination of internal SES data, which are detailed below.

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.

EPA will collect and analyze more detailed information on internal applicants to SES vacancies in FY 16. Without that information, EPA cannot identify a specific hiring or promotion process policy, practice, or procedure that may be impacting the representation of any group in the SES.

Objective: State the alternative or revised Agency policy, procedure or practice to be implemented to correct the undesired condition.	To identify triggers and potential barriers, EPA will continue its efforts to enhance its automated data capture capabilities for internal SES hires.
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Responsible Officials:	Acting Assistant Administrator, Office of Administration and Resources Management Director, Office of Civil Rights Director, Office of Human Resources Deputy Civil Rights Officials
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Date Objective Initiated:	October 1, 2013
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Target Date for Completion of Objective:	December 30, 2018
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Planned Activities Toward Completion of Objective:	Target Date (Must Be Specific)
1. OCR will collaborate with OARM 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.	March 31, 2018
2. OCR will collaborate with OHR to collect and analyze applicant flow data for internal applicants for SES vacancies.	March 31, 2018
3. OHR 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.	November 30, 2018
4. OHR will ensure full implementation of the new learning management system.	December 31, 2018
5. OHR will create a tool or process to assess effectiveness of career development activities in the learning management system.	December 31, 2018
6. OHR/Executive Resources Division (ERD), will provide ongoing training to Agency employees interested in applying to the SES. This will include panel discussions with current agency SES managers to develop those in the feeder pool.	September 2017

Report of Accomplishments and Modifications to Objective:

The accomplishments below are numbered to correspond with the planned activity.

Activity No 2. This activity was extended to ensure full collaboration while OHR/DRESO conducted several office realignments and made changes in leadership in 2016. DRESO was created in FY 16 and implemented the process and consideration of sufficient staffing needs to address workforce employment initiatives.

Activity No 3. OHR manually tracked employee mandated training requirements and continues to work on interagency opportunities to develop and implement a learning management system for training, details, and e-learning as opposed to career development activities.

Activity No 6. ERD conducted two leadership training sessions in September 2016, one for employees interested in first line supervisory roles and one for employees interested in SES.

Part I: EEO Plan to Eliminate Identified Barrier

Part I-5: Individuals with Targeted Disabilities

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 total number of individuals with targeted disabilities in the total workforce decreased from 364 (2.34%) in FY 15 to 346 (2.20%) in FY 16.

Persons with Disabilities and Targeted Disabilities are separating from the permanent EPA workforce at higher rates than their FY 16 EPA workforce participation rates:

	PWD	PWTD
Current FY Rate of Separation	10.92%	3.72%
Current FY Rate of Workforce Participation	7.61%	2.30%

NOTE: EPA participation rates for PWTD has for the third time, surpassed the Federal benchmark of 2.00%.

Barrier Analysis:

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

EPA completed Part J of the EEO Program Status Report and conducted analysis of the following:

Research

Review of practices to increase the employment of PWD in accordance with Executive Order 13548; EPA Strategic Plan for Employment of Individuals with Disabilities; hiring and promotions policies, practices, and procedures applicable to recruitment and retention of PWTD; the Federal Employee Viewpoint Survey results; OPM Hiring Survey results ending FY 16; the efficiency and effectiveness of the EPA's reasonable accommodation program; and EEOC's 462 and data related to applicant flow ending FY 15 and ending FY 16.

Analysis

PWD/PWTD data analysis resulted in the following:

The total number of PWTD in the EPA workforce declined from 364 in FY 15 to 346 in FY 16. Also in FY 16, EPA separated from its permanent/temporary workforce 796 employees overall; of that, 88 (10.80%) were PWD and 30 (3.77%) were PWTD, resulting in a total of 118 (14.57%) separated employees with disabilities.

New Hires

There were 1,126 permanent/temporary new hires in FY 16. Analysis of new hires in FY 16 reflects an increase in the actual number of PWD/PWTD new hires when compared to FY 15. In FY 16, there were 111 (9.57%) new hires that had a disability when compared to 97 (10.09%) new hires in FY 15. In FY 16, there were 19 (1.64%) new hires that had a targeted disability when compared to 11 (1.14%) new hires with a targeted disability in FY 15.

The above analysis indicated that, while the number of PWD increased, their actual participation rates within the overall workforce decreased in FY 16. In contrast,

	<p>while the number of PWTB increased, their actual participation rates within the overall workforce increased in FY 16.</p> <p>Separations</p> <p>Separations occur at higher rates than those of new hires for both PWD/PWTB.</p> <p>Additionally, there was intermittent dissemination of potential PWD/PWTB candidate resumes to hiring officials for an identified position during the reorganization of OHR.</p> <p>Further analysis is required on recruitment efforts and the retention of PWD/PWTB.</p>
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<p>Statement of Identified Barrier:</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>Although awareness and utilization of special appointment authorities have increased, the Agency has not identified a barrier at this time. Further analysis will be necessary.</p>
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<p>Objective:</p> <p>State the alternative or revised Agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>Collect data from hiring officials and employees with disabilities and targeted disabilities to further identify if potential barriers exist to hiring and retaining persons with disabilities/targeted disabilities.</p>
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<p>Responsible Officials:</p>	<p>Acting Assistant Administrator, Office of Administration & Resources Management</p> <p>Director, Office of Human Resources</p> <p>Director, Office of Civil Rights</p> <p>Deputy Civil Rights Officials</p>
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<p>Date Objective Initiated:</p>	<p>October 1, 2016</p>
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<p>Target Date for Completion of Objective:</p>	<p>September 30, 2021</p>
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Planned Activities Toward Completion of Objective:	Target Date (Must Be Specific)
1. The EPA Special Placement Program Coordinator (SPPC) and the National Disability Employment Program Manager will provide counsel and advice to hiring managers and job applicants on the Schedule A hiring process and the disability hiring tools in general.	December 31, 2018
2. OHR and OCR will analyze: 1) the uniform use and training on Schedule A and 5 CFR 213.3102(u); 2) the availability of disability training programs on Schedule A and the Workforce Recruitment Program (WRP) for managers; and 3) the gathering of applicant flow data.	November 30, 2018
3. Will work more cooperatively with DRES and OARM on Schedule A recruitment and hiring by more effective resume dissemination to available positions. Amended to: OHR/DRES and OCR will collaborate on increasing the use of and tracking of Schedule A recruitment and hiring by developing an effective resume database with the ability to track the resume once it's disseminated for an open position. OHR will re-establish the Agency's 5-year Strategic Plan for Individuals with Disabilities as required in Part J to include performance targets for PWD/PWTD. OCR will examine the applicant flow of PWTD.	December 31, 2018
4. OHR will further develop its partnerships with universities, colleges and organizations, such as Gallaudet University, to renew existing Memoranda of Understanding (MOUs); and/or create new MOUs (e.g., with Rochester Institute of Technology/National Technical Institute for the Deaf), that will enhance student opportunities (paid/unpaid) within the Agency.	December 31, 2018
5. Section 508 Coordinators Executive Group will make available Assistive Technology for the Port Talent Hub.	November 30, 2018

Report of Accomplishments and Modifications to Objective:
<p>In FY 16, EPA accomplished several planned activities that strive to improve the representation of PWTD in its workforce. The Office of Grants and Debarment and OCR co-hosted a disability hiring training at the "EPA Mentoring Day" for the students of George Washington University on March 22, 2016.</p> <p>Activity No 1. Special Placement Program Coordinator (SPPC) for EPA also serves as the National Disability Employment Program Manager (DEPM) and provided counsel and advice to hiring managers and job applicants on the Schedule A hiring process and the disability hiring tools in general.</p> <p>Activity No 2. NRAC delivered RA training at the EPA agency-wide HR Conference to Regional LORACs and HR specialists in March 2016, two program offices in May 2016 (1 session for managers/supervisors) and in September 2016 (4 sessions for employees, managers/supervisors).</p> <p>Activity No 3. The DEPM worked closely with OHR and DRES to collect and distribute resumes and Schedule A letters to hiring managers. Hiring opportunities for people with disabilities have increased.</p> <p>Activity No 4 OHR and OCR analyzed:</p> <ul style="list-style-type: none"> the uniform use and training on Schedule A and 5 CFR 213.3102(u); training programs on Schedule A use and requirement for applicants and managers; and available applicant flow data.

Report of Accomplishments and Modifications to Objective:

Additional Agency Highlights:

The National DEPM, along with the Office of Environmental Information and OHR co-sponsored the National Disability Employment Awareness Month Program (NDEAM). This training was conducted by the DEPM, Autism SPEAKS, Al-Mohamed, and the Department of Labor (DOL), Office of Disability Employment Program (ODEP). Various other briefings were presented at staff meetings and technical assistance visits throughout the year.

Provided Agency-wide training to the SEPMs on the MD 715 applicant flow data on hires and percentages of PWTD at EPA.

Training was also provided to the SEPMs on “SEPMs: How you can conduct a 20-minute briefing/brown-bag training on disability hiring tools to hiring managers.” The training covered the Workforce Recruitment Program (WRP) and the Schedule A appointment authority.

DRES D

In FY 16, DRES D monitored and tracked recruitment opportunities for PWD/ PWTD resulting in the following strategic recruitment opportunities:

- Gallaudet University Career Fair on October 2, 2015.
- Equal Opportunity Publications Careers and the disABLED career fairs on November 13, 2015, and May 13, 2016.

The EPA has also worked with Gallaudet University to provide students with opportunities to volunteer with the Agency.

The OHR Disability Program Coordinator volunteered to become a recruiter for the DOL WRP for college students with disabilities.

DRES D and OCR collaborated on TAVs with each program and regional office where guidance related to potential barriers of employment, promotion or career development was shared, for example: workforce demographics, workforce participation by RNO and disability, hiring flexibilities, the use of hiring panels and best practices.

Coordination between OHR’s Disability Program Coordinator and Veteran Employment Program Manager (VEPM) helped to increase the PWD/PWTD workforce through partnerships like the Longview School, which developed environmental education activities that will engage and provide increased awareness of EPA jobs to students with disabilities, along with other groups such as disabled veterans programs. At the end of FY 16, the total number of veterans hired was 185, with 119 being veterans with disabilities. This is an increase from FY 15.

OHR attended career events designed to educate and recruit veterans and veterans with disabilities, including events sponsored by the DOL, U.S. Department of Veterans Affairs, U.S. Department of Defense, the National Institutes of Health, and Quantico Marine Corps Base. The VEPM was also responsible for coordinating a training event for hiring managers that focused on working with employees diagnosed with Post Traumatic Stress Disorder (PTSD).

EPA managers are encouraged to use flexible hiring authorities such as Schedule A, the Veterans Recruitment Appointment and the Veterans Employment Opportunity Act to hire veterans and veterans with disabilities as a non-traditional hiring mechanism, eliminating the need for certain steps in the traditional hiring process. In FY 16, a partnership was created with OPM in which specific positions were advertised on Facebook and through Twitter, allowing more opportunity for veterans with disabilities and others to learn of job openings.

Additionally, EPA partnered with the Operations Warfighter Program and the Non-Paid Work Experience Program to create the EPA Injured Soldier Veteran Volunteer Placement Program. This program allows hiring managers to bring on veterans and active duty soldiers to work on specific projects for a specific timeframe. At the conclusion of the project, if the volunteer is available and the hiring manager has a position to fill permanently, the volunteer can be converted non-competitively.

Affirmative Employment Accountability and Analysis

In FY 16, the National Disability Program Manager worked with the EEO Officers and Program Management Officers to provide guidance and information for their respective Headquarters program offices and Regions through their MD-715

Report of Accomplishments and Modifications to Objective:

action plan related to PWD/PWTD. This effort is to explore possible attitudinal or institutional barriers that may contribute to the increased separations rates of PWTD.

Telework Enhancements Improving Accommodations

EPA provided training to managers and employees on the telework initiative in the event of an emergency. The support of this initiative provides access and accommodation for employees with disabilities, and allows these employees to telework in the event of an emergency or inclement weather.

Managers and Supervisors Awareness

Promoted Schedule A hiring by providing trainings that will bring awareness to EPA hiring managers and supervisors about hiring, converting and promoting more qualified employees with disabilities.

Increased training about Schedule A helped EPA hiring managers and supervisors learn not only about the hiring process, but how the employees' conversion to permanent status impacts the diversity of EPA's workforce. Other training provided throughout the year covered topics such as unconscious bias and attitudinal barriers, stereotypical assumptions/thinking, and perceptions based on a person's appearance that may lead a reviewer to question the ability of applicants with disabilities to perform the duties of the job.

Provided EPA-wide training to the SEPMs on the MD-715 applicant flow data on hires and separations of PWTD at EPA.

Reasonable Accommodation Program

At the EPA agency-wide Human Resources Conference, the NRAC delivered RA training to Regional LORACs and HR specialists in March 2016, including one session for managers/supervisors, in May 2016 for two program offices, and September 2016 four sessions for employees, managers/supervisors).

Finalized the design and functionality of the Reasonable Accommodation Management System (RAMS), which will enable OCR to analyze disability related RA data, identify trends, and provide metrics in real time.

Developed a template for travel-related RA requests to meet GSA requirements.

Reinitiated the monthly reporting of RA numbers to AFGE consistent with the negotiated RA procedures.

During FY 16, EPA processed a total of 294 RA requests, which is an increase of 71 requests from FY 15. The following is a summary and analysis of these requests:

- A total of 265 of the 294 requests (90.1%) were processed and concluded in FY 16;
- 213 of the 294 (72.4%) were approved
- 9 of the 294 (3.1%) were denied
- 26 of the 294 (8.8%) were withdrawn by the employee
- 5 of the 294 (1.7%) were denied under RA but with some relief offered outside of the RA process
- 2 of the 294 (.7%) retired
- 6 of the 294 (2.0%) closed (no response from employee)
- 1 of the 294 (.3%) passed away
- 1 of the 294 (.3%) resigned
- A total of 29 of the 294 (9.7%) remain in pending status.
- A total of 2 of the 294 (.6%) are in a delayed status.

The Agency processed 268 of the 294 requests (91.1%) within the time frames identified in both the EPA-AFGE National Reasonable Accommodation Procedures (NRAP) and the EPA RA Procedures. The Agency has attained the 90% processing rate for the sixth consecutive year in compliance with the requirements outlined in MD-715.

The AFGE NRAP requires a decision regarding an employee's request within 25 days of the request, absent any legitimate extenuating circumstance. The EPA RA Procedures require a decision regarding an employee's request within 10 days of the request, absent any legitimate extenuating circumstance. If any such legitimate extenuating circumstance exists, both sets of procedures, as well as guidance from EEOC, allow for a reasonable extension of the established time lines.

Report of Accomplishments and Modifications to Objective:

Extenuating circumstances include, but are not limited to:

- Management Decision Maker (DM) requests an extension of the time line;
- Employee requests an extension of the time line;
- Employee and/or DM are unable to meet to discuss the request due to scheduling problems for one or both;
- Employee is on extended leave;
- Awaiting a response from the Department of Defense/Computer Electronic Accommodation Program for approval/denial;
- NRAC is awaiting medical information to be submitted by a health care professional.

The RA Program effectively manages and monitors the EPA partnership agreement with the Department of Defense/Computer Electronic Accommodation Program to ensure that appropriate referrals are made.

SECTION 508

EPA's Section 508 Executive Council is comprised of senior leaders across the Agency. The Executive Council is responsible for guiding the Agency's Section 508 Program as it strives to improve EPA's adherence to Section 508 and the overall accessibility of EPA's electronic and information technology.

In FY 16, the Executive Council held two Section 508 Community Forums to provide stakeholders a better understanding of the Section 508 Council, and Assistive Technology (AT).

To standardize training on assistive technology (AT), EPA delivered webinar-based training on five topics including accessible Word documents, accessible websites, accessible PDFs, accessible PowerPoint and Section 508 Introduction.

An agency-wide data call was conducted to test enterprise systems with proposed standard AT; the NRAC met with EPA's 508 Liaisons to provide updates on Section 508 requirements and activities and respond to questions and issues for their respective offices.

The Section 508 intranet site was updated and expanded to include Quick Reference Guides and other resources to help EPA staff meet Section 508 and accessibility requirements at: <http://intranet.epa.gov/accessibility>.

Part J: Special Program Plan for the Recruitment, Hiring, and Advancement of Persons with Targeted Disabilities

EEOC FORM 715-01 PART J	U.S. Equal Employment Opportunity Commission Special Program Plan for the Recruitment, Hiring, and Advancement of Persons with Targeted Disabilities						
PART I Department or Agency Information	1. Agency	1. US Environmental Protection Agency					
	1a. 2 nd Level Component	1a. N/A					
	1b. 3 rd Level or lower	1b. N/A					
PART II Employment Trend and Special Recruitment for Persons with Targeted Disabilities	Enter Actual Number at the ...	Start 10-1-2015 (Table B-1)		End 9-30-2016 (Table B-1)		Net Change	
		Number	%	Number	%	Number	%
	Total Work Force	15,566	100.00%	15,754	100.00%	188	1.21%
	Reportable Disability	1,132	7.27%	1,169	7.42%	37	3.27%
	Targeted Disability*	364	2.34%	346	2.2%	-18	-4.95%
	* If the rate of change for Persons with Targeted Disabilities is not equal to or greater than the rate of change for the total workforce, a barrier analysis should be conducted (see below). Please see Part I-5.						
	1. Total Number of Applications Received for Major Occupations from Persons with Targeted Disabilities during the reporting period. (Table B-7)					276	
	2. Total Number of Selections of Persons with Targeted Disabilities during the reporting period. (Table B-7)					0	

PART III Participation Rates in Agency Employment Programs									
Other Employment/ Personnel Programs	TOTAL	Reportable Disability		Targeted Disability		Not Identified	No Disability		
		#	%	#	%	#	%	#	%
3. Competitive Promotions for Major Occs (Table B9)	311	3	0.96%	0	0.00%	173	55.63%	135	43.41%
4. Non-Competitive Promotions (B-10)									

PART III Participation Rates in Agency Employment Programs									
Total Employees Eligible for Career Ladder Promotions	1,126	127	11.28%	24	2.13%	62	5.51%	937	83.21%
Time in Grade Excess of Minimum									
4.a. 1–12 Months	29	7	24.14%	1	3.45%	2	6.90%	20	68.97%
4.b. 13–24 Months	16	3	18.75%	1	6.25%	0	0.00%	13	81.25%
4.c. 25+ Months	28	4	14.29%	2	7.14%	1	3.57%	23	82.14%
5. Employee Career Development Programs by Grade Level (B-12)	This data is not available in EPA Datamart.								
6. Employee Recognition and Awards (B-13)									
6.a. Time-Off Awards (Total hrs. awarded)	116,246	8,844	7.61%	2,494	2.15%	2,390	2.05%	105,012	90.34%
6.b. Cash Awards (Total \$\$ awarded)	22,185,243	1,388,486	6.26%	413,750	1.86%	345,871	1.56%	20,450,886	92.18%
6.c. Quality-Step Increase	1,188,891	68,635	5.77%	16,193	1.36%	25,369	2.13%	1,094,887	92.09%

Part IV Identification and Elimination of Barriers	<p>Overall PWD/PWTD Workforce (permanent/temporary workforce)</p> <p>EPA's permanent and temporary workforce ratio for PWD at the end of FY 16 was 7.42% (1169) when compared to the EEOC Federal Benchmark of 12.00%.</p> <p>EPA's permanent and temporary workforce ratio for PWTD at the end of FY 16 was 2.20%, surpassing the EEOC Federal Benchmark of 2.00% in FY 16. (See Appendices for B 1 Table).</p> <p>EPA added 1,159 permanent and temporary new hires to its overall workforce in FY 16; of that, 111 (9.58%) were PWD 19 (1.64%) were PWTD.</p> <p>There were 806 separations from the permanent and temporary workforce; of that, 88 (10.92%) were PWD and 30 (3.72%) were PWTD, for a total of 118 (14.64%).</p> <p>Analysis of New Hires and Separations for PWD/PWTD</p> <p>EPA implemented a five-year strategic plan for PWD/PWTD (2011-2015), which established specific goals and metrics to increase PWD/PWTD new hires. During the five-year period, EPA experienced an overall decrease in hiring opportunities. While the Agency did not meet its 2% goal of PWD/PWTD new hires, during this 5-year period, a survey of its workforce in FY 14 indicated that EPA had exceeded the Federal benchmark of 2% PWTD in the current workforce.</p> <p>In FY 15, EPA introduced hiring initiatives that would increase participation rates where there were less than expected participation rates for all groups. Hiring managers were trained on and encouraged to use special hiring authorities for Schedule A, disabled veterans, and</p>

other outreach and recruitment sources to increase its disabled/targeted disabled application rates.

Analysis of new hires in FY 16 would suggest that there was an increase in the actual number of PWD/PWTD new hires when compared to FY 15. In FY 16, there were 111 (9.57%) PWD new hires t disability when compared to 97 (10.09%) PWD new hires in FY 15. In FY 16, there were 19 (1.64%) PWTD new hires when compared to 11 (1.14%) PWTD new hires in FY 15. The above analysis indicated that while the number of PWD increased, their actual participation rates within the overall workforce decreased in FY 16. In contrast, while the number of PWTD hires increased, their actual participation rates within the overall workforce increased in FY 16.

Trend analysis of PWD/PWTD new hires between FYs 14 and 16 resulted in the following:

New Hires	2014	2015	2016
Persons with Disabilities	12.87%	10.09%	10.89%
Persons with Targeted Disabilities	0.95%	1.14%	1.64%

Separations of PWD/PWTD were also considered in this analysis. There were 88 (10.92%) PWD separations in FY 16, when compared to 80 (8.47%) in FY 15, which is a net increase of 2.45%. There were 30 (3.72%) PWTD separations in FY 16, when compared to 22 (2.33%) separations in FY 15, which is a net increase of 1.39%. The above data indicates that EPA experienced an overall increase in the actual number and rates of separations from FY 15 to 16 for both PWD/PWTD.

In summary, when comparing EPA new hires to separations, separations occur at higher rates than selections for both PWD/PWTD.

Retention (Conversions)

In FY 15, SSCs along with OCR, collaborated in tracking the conversion of Schedule A two year temporary appointments to competitive career status. In FY 16, OHR/OITD worked with OCR to directly access and track the conversions of Schedule A appointees from temporary to competitive career status. There were five (5) eligible Schedule A appointees converted to competitive status.

DRESA, along with OCR, continues to ensure that newly appointed supervisors and current supervisors are provided a Schedule A Hiring Authorities Fact Sheet during new employee orientation and supervisor training.

EPA has sustained efforts to increase its current workforce of PWD/PWTD. Continued analysis will include review of recruitment, hiring, career development, promotion and retention of PWTD. Analysis did not identify any barrier to Schedule A conversions and EPA will continue tracking. However, for new hires and separations, EPA will plan additional analysis.

In accordance with Executive Order 13548 - Increasing Federal Employment of Individuals with Disabilities and the MD-715's requirement to establish a Strategic Plan for Federal Employment of Individuals with Disabilities, EPA established the following goals in 2011:

EPA will ensure that 9% of its new hires will represent persons with disabilities and of that 9%, 2.0% of those new hires will represent people with targeted disabilities by the end of 2015.

Source: EPA Strategic Plan for Federal Employment of Individuals with Disabilities;
OARM/OHR (April 2011)

	<p>The second five-year strategic plan for PWD/PWTD is under development.</p> <p>Recommendations</p> <p>Although PWD and PWTD continue to be among the most underrepresented groups in federal government, EPA new hires for PWTD have consistently increased since FY 14. To further improve hiring efforts for PWD, and specifically PWTD, the Agency should re-establish a strategic plan with overall hiring goals of PWD/PWTD. The plans should address:</p> <ul style="list-style-type: none"> • deliberate outreach and recruitment to sources with established programs for PWD and PWTD; • continued use of special hiring authorities; and, • continued education on RA and other resources. <p>Specifically, EPA will strive to increase PWD/PWTD in recruitment, hiring, career development, promotions, and retention opportunities by:</p> <ul style="list-style-type: none"> • conducting training and awareness on myths and stereotypes about employing PWTD; special hiring authorities for PWTD; reasonable accommodation policy and procedures; and career status in the federal personnel system; • demonstrating commitment for employing PWTD; • encouraging persons with disabilities to self-identify; • developing internal and external partnerships to identify best practices (i.e., HRC, DIAC); • reviewing Schedule A appointees' performance annually to determine eligibility for conversion into the competitive service.
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Part K: EPA Promising Practices

The EPA FY 14 - FY 18 Strategic Mission prioritizes the recruitment and retention of employees with diverse backgrounds and perspectives who will be positioned to effectively accomplish the Agency's mission and meet evolving environmental and sustainability challenges. The following are noteworthy trends in promising practices within the Agency.

MODEL PROGRAMS

Commitment at the Highest Level

At EPA, EEO and Anti-Harassment policies are issued by the Administrator, and reaffirmed by program offices to ensure employees are aware of the EPA's EEO policies and procedures. EPA employees are required to participate in EEO and Anti-Harassment related training such as the No FEAR Act training. EPA also requires a performance element for EEO and workplace diversity and inclusion accomplishments in the respective performance plans of senior leaders, including GS 13-15 supervisors. In addition, senior leaders in the offices identified below:

- Create a direct means of communication between the Administrator and OCR to determine strategies for EEO concerns and help identify triggers. In some Regions, the Regional EEO Officers may have a direct communication with their Regional Administrator/Deputy Regional Administrator and Diversity Civil Rights Official. (OCR, Regions)
- Meet regularly with the NRAC/LORACs to ensure timely response to RA requests. (OCR, Regions)
- Implement local and national EEO related training of managers, supervisors and employees on policies and procedures such as workplace harassment, reasonable accommodations, responsibilities under EEO, and other topic series like unconscious bias, (OA, Region 4)
- Streamline the number of required trainings in a fiscal year to ensure a quality approach and increased awareness. Repeat trainings year to year as necessary. (OARM)
- Appoint senior executives to champion the development and implementation of EEO training programs for managers and supervisors. Include subjects such as EEO laws, regulations, rights, duties and responsibilities to promote workplace best practices. (OECA)
- Issue program mandates which require managers and supervisors to participate in monthly lunch and learn sessions on EEO, diversity and inclusion (e.g., Transgender policy and procedures). (OEI)
- Create an inclusive and strategic process for developing critical plans and activities related to EEO and diversity and inclusion by instituting a team to participate in related areas such as recruitment, hiring, career development, training and retention. Senior leaders, managers and supervisors, Human Resource Officers (HRO), EEOOs and SEPMs attend TAVs to learn and offer their input and expertise in finalizing a strategic approach to eliminating potential barriers where triggers exist. Senior leadership engagement is critical to employment workforce demographic outcomes. (ORD)
- Post EPA EEO policies throughout the Region 1 facility to ensure employees receive multiple opportunities to be aware of new EEO contacts, rights and responsibilities, and processes. (Region 1)
- Encourage employees to become active participants in the EEO counseling program which requires participants to complete new/refreshers training. A strengthened EEO counseling program can ensure timeliness in complaints of discrimination response rates by providing back-up assistance where needed. (Region 2)
- Use a standard post-interview feedback form issued to new hires to measure potential barriers in areas where triggers exist. (Region 3)

Hiring Panels

Hiring and Promotion Safeguards

- *Hiring Panels that eliminate the perception of preselection* – This program provides a series of steps to ensure quality and balance within the hiring process. The hiring panel reviews the criteria for a specific position being advertised for a division, including a discussion on what the classification of the position should be (professional, administrative, or technical); how the position should be advertised (internal or external); and, at what grade level the position should be advertised. The hiring panel is convened by the Deputy Assistant Regional Administrator for Policy and Management and is comprised of the following: HRO, EEOO/Diversity and Inclusion Manager, Selecting Official, and another manager designated by the Selecting Official. (Region 3)
- *Hiring Panels for major occupations and grade levels* – Hiring panels are fully utilized in accordance with the Agency's guidance for conducting hiring panels. Members of hiring panels may be from a cross-section of grade levels, and may be SEPMs. Combined with other approaches, this use of hiring panels has resulted in selections of permanent hires that have crossed RNO groups. (OW)

Increasing Participation of Persons with Disabilities/Targeted Disabilities

Promotion of Schedule A Hiring Authority

- Using non-traditional internship programs as a means to recruit – EPA has an external partnership with a non-profit organization that serves individuals with disabilities to develop internship opportunities that could lead to a diverse permanent workforce. (Region 9)

Target Vacancies for Non-Competitive Hiring

- Implementing processes which require hiring officials to discuss opportunities where vacancies can be filled by using non-competitive special hiring authorities such as Schedule A prior to advertising, and require plans for specific outreach strategies. (Region 10)

Create Opportunities for Education/Awareness

- Using a *Nuts-Bolts Training* session for managers on hiring authorities. (Region 3)
- Developing training, in consultation with the EPA Headquarters training committee, such as disability awareness for managers and staff. Managers and staff have different needs, therefore training topics can vary such as disability etiquette, dispelling myths, methods to recruit using special hiring authorities, etc. (Region 4)

Utilizing Targeted Partnerships and Resources

- Filled two positions using the WRP for College Students with Disabilities. (Region 4)
- Using the WRP as a focused educational resource to increase awareness of careers available within the EPA through classroom, webinars and online training. (Region 9)

Career Development

The Agency promotes the use of Leadership Development Programs (LDP), temporary promotions/details and other developmental trainings, and mentoring programs to increase participation rates and to raise its employee skills.

National Program

- The EPA Talent Hub website was launched to serve as a centralized resource for a range of career development opportunities across the Agency. The Talent Hub was a recommendation from two high-level committees, the Human Resources Council and the High Performing Organization Team. Feedback from the *Federal Employee Viewpoint Survey* and discussions with employees were factored in the recommendation. The Talent Hub stores all full-time and part-time details, and temporary promotion opportunities. The Talent Hub is continuously updated with opportunities, including mentoring and intergovernmental personnel assignments. Assistive Technology users do not have the same access to the Talent Hub website.

Other Programs and Trainings

- **Leadership Development Programs (LDP).** Region 6 launched a model LDP in 2006, which provides opportunities for leadership development for Region 6 employees in program areas. The application and selection process requires interest, satisfactory performance, and supervisory approval. The Training Coordinator and SEPMs assist managers to further promote the LDP as a tool for professional development. Region 6 has provided leadership development training to over 50% of its staff and 70% of its managers. Region 2 also provides opportunities for leadership development in an array of programs to enhance participation rates.
- **Career Wise training.** A series of trainings for managers and employees on topics such as: SES 101, Leadership Ally Board, Understanding Candidate Development Programs, Resume Training, Idea Lab for Executives, Mock Interviews, Career Conversations, Employee Assistance Program, Individual Development Plan Training, Staffing, Classification, and Recruitment Training. The series allows for multiple classes conducted simultaneously throughout a three-day period in the year. (Region 4)
- **Job Rotations.** Rotational opportunities in positions with supervisory authority that are vacant allow employees to further develop. (OAR)
- **Interdivisional Opportunities Database.** Internal opportunities are provided through the interdivisional opportunities database for employees to acquire skills and perform duties at a higher level in the organization. (OGC)
- **Assessment of Underrepresentation within Senior Grades.** The Diversity Steering Committee researched and offered recommendations to increase the diversity of the Region's leadership feeder pool (i.e., staff in grades GS-13 and above). The committee's work resulted in career development programs that help increase participation rates of the Region's leadership feeder pools and for administrative staff in Grades 11 and below. (Region 1)
- **Talent Management Action Plan.** Developed and implemented a Talent Management Action Plan to achieve numerous goals, including to ensure that employee development is planned, structured, and systematic, yet flexible enough to address organizational and individual needs. OEI is assessing outcomes. (OEI)
- **SES 101.** Training series was developed for GS 13-15 employees. (OARM)

Individual Development Plans

- **Individual Development Plans (IDPs).** OEI conducted extensive outreach and encouraged each employee to create an IDP as a part of their career developing activities. Office of Land and Emergency Management conducted training sessions on "How to Develop Individual Development Plans." (OEI and OLEM)

Mentoring Programs

- **Speed Mentoring and Job Swaps.** Developed and implemented successful mentoring programs, including a tool kit, that assists employees to work together effectively. Management development opportunities were included as well. Introduced the concept of "speed mentoring," which is an event designed to help match mentors and mentees. Efforts to expand this concept will include a "job swap forum" in the coming year. (Region 6)
- **Leaders and Learners Collaborative Mentoring.** Encouraged and supported active participation by management and staff in the Leaders and Learners Collaborative Mentoring Program throughout the year. (OCSPP and OCFO)

Implementing Outreach and Recruitment Strategies that Develop a Talent Pipeline

Develop External Partnerships and Memorandums of Understanding

The Agency continues to strengthen its partnerships with Minority Serving Institutions (MSIs) and Historical Black Colleges and Universities (HBCUs). These partnerships allow for continual increase of applicant outreach. Through these partnerships and by hosting career fairs, the Agency can assist students through workshops that prepare them for applying for federal jobs and resume building. At least 10 National Program Offices utilize partnerships with MSIs through similar memoranda of understanding.

- Region 3 provides opportunities in the Mid-Atlantic Regions through LEAP: Linking Environmental Academic Programs at EPA. Their partnerships between the EPA Mid Atlantic and four HBCUs, along with two non-profit organization and two state government Agencies, reach out to the local community to provide high school and college degree programs in environmental technology and science, leading to careers in environmental protection.
- Region 5 offers training about MSIs to staff and managers, including Associate Division Directors. This training was intended to increase participation rates of persons with targeted disabilities, through the WRP, and recruitment of Hispanic engineers through the Society of Hispanic Engineers for spring external hires.
- OIG partnered with The Chicago School of Professional Psychology to establish a strategic recruiting partnership for student volunteers. The volunteers conduct formal research and evaluate the *Federal Employee Viewpoint Survey*, MD-715, and leadership norms data. OCR has taken advantage of this opportunity as well.
- OLEM partnered with two MSIs, University of Maryland Eastern Shore and City College of New York, and the Maryland Coastal Bays Program to become more active and engaged on campus and to expand recruitment opportunities through internships.

Develop or Enhance Internal Partnerships

- **Working with Shared Service Centers.** OARM, along with its SSCs, work with hiring managers to decide what additional sources can be used to disseminate job announcements using EPA's diverse Recruitment Source List, Minority Academic Institutions, and external stakeholders in accordance with the Standard Operating Procedure developed in FY 13.
- **Conducting Regular Assessments of Outreach Efforts.** Region 7 EEO Officer and Office of Regional Counsel partnered with the EPA offices OHR and the Office of Public Affairs to review its recruitment and outreach strategy which resulted in updates to Region 7's use of social media to facilitate outreach activities prior to the job announcements.

Comprehensive Outreach and Recruitment Plans

- **Requiring Plans for a more strategic approach.** Office of Water's DCRO requires its program offices to develop an annual comprehensive recruitment and outreach plan. Job announcements are permitted to proceed only after the plan has been approved by the DCRO.
- **Inclusion of Relevant Civilian Labor Force Data.** All Regions and Headquarter program offices were provided data on their relevant civilian labor force. Region 7, instrumental in pulling this data for all Regions and program offices, uses this data after a selection has been made to assess the quality of its recruitment efforts.

Train Your Employees

- Region 8 held nine "How to Apply for Federal Jobs" webinar sessions open to EPA employees and the public.

Special Emphasis Programs

- The Agency support of its SEPs is demonstrated through its campaign initiatives in FY 15 and FY 16 to fill vacancies throughout each program office and within the Regions.
- **SEP Leadership Program.** Human Resource Council (HRC) has explored ways to assist OCR and DRESO to convene a workgroup to develop a leadership opportunity program where employees who serve as SEPMs can benefit in leadership development during their 2-year term appointment. SEPMs are expected to be leaders in their local program offices and Regions, engaging management in strategies to increase participation in areas where underrepresentation is present.
- **National SEPM Handbook.** OCR, DRESO and Region 9 began the process of redrafting the EPA SEPM Handbook that will assist managers, and employees participating as SEPMs, to implement aspects of the program. Expected issuance is FY 17 third quarter.
- **Co-Managing SEP.** Region 8 encourages the use of two individuals acting as co-managers to lead SEPs, each conducting 10% collateral duty, rather than requiring single managers to dedicated 20% collateral duty time. This move helped to staff several SEPs that did not have managers in place; the ability to share the duty allowed employees to better balance SEPM duties with their already full workloads.
- **Budgeting for SEP.** Region 10 instituted a specific line item for Civil Rights/EEO to assist with SEPs. The need/initiative was identified to address MD-715 triggers and actions, to reduce/eliminate triggers related to advancing Civil Rights/EEO. Programmatic training and strategic planning with other regional colleagues and OCR is critical to the overall mission of the Agency.
- **Specialized Training.** EPA provided the SEPMs a training on MD-715 applicant flow data on hires and separations of PWTB targeted at EPA. It also included a “How to conduct a 15-20 minute briefings/brown-bag trainings on the disability hiring tools for hiring managers” on the Workforce Recruitment Plan and the Schedule A hiring authority.

Employee Engagement

Workforce Engagement and Lean Teams

- The Office of Administrator (OA) recommended that the HR LEAN Team provide a plan that includes customer service for new employees with information on expectations, upcoming dates for activities/events, and a welcome. OA heightens awareness through shared OA-wide updates.
- The Office of International Tribal Affairs (OITA) LEAN Onboarding Team launched an Onboarding Process SharePoint site which has especially benefitted its new hires. OITA also created a Diversity Action and Quality of Work Life Council. The Council develops trainings to promote communication between management and staff and to raise awareness of Skills Marketplace trainings. The Council has sought to improve how management communicates monetary and time-off awards information to staff.
- OA formed the Workforce Engagement Workgroup to increase employee engagement within OA. Using *Federal Employee Viewpoint Survey* data, the workgroup identified seven areas of employee concerns and is considering potential solutions and/or improvements to recommend to senior management.

MD-715 EEO WORKFORCE DATA TABLES (A)

Distribution by Race/Ethnicity and Sex

MD-715 EEO WORKFORCE DATA TABLES (B)

Distribution by Disability

ORGANIZATIONAL CHART

POLICIES

PROCEDURE FOR ADDRESSING ALLEGATIONS OF WORKPLACE HARASSMENT PURPOSE
