## EQUAL EMPLOYMENT OPPORTUNITY COMMISSION (EEOC) MANAGEMENT DIRECTIVE 715: FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Washington Headquarters Services (WHS) and WHS-Serviced Components

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EEOC FORM 715-01 PART A - D

#### U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

#### STATUS REPORT For period covering October 1, 2019 to September 30, 2020 PART A 1. Agency 1. Washington Headquarters Services (WHS) and Department WHS serviced components or Agency Identifying 1.a. 2<sup>nd</sup> level reporting component N/A Information 1.b. 3<sup>rd</sup> level reporting component 1.c. 4<sup>th</sup> level reporting component 2. 1155 Defense Pentagon 2. Address 3. Washington, DC 20301-1155 3. City, State, Zip Code 4. CPDF Code 5. FIPS code(s) **4.** DD21 **5.** 8840 PART B 1. 4,582 1. Enter total number of permanent full-time and part-time employees Total **Employment** 2. Enter total number of temporary employees 2. 919 3. 3. Enter total number employees paid from non-appropriated funds 0 4. TOTAL EMPLOYMENT [add lines B 1 through 3] 4. 5,501 PART C Regina F. Meiners, Acting Director, WHS 1. Head of Agency Official Title Agency Official(s) Responsible N/A For Oversight 2. Agency Head Designee of EEO Program(s) Regina F. Meiners, Acting Director, WHS 3. Principal EEO Director/Official Official Title/series/grade Pamela R. Sullivan, Director, Office of Equal 4. EEO Director Employment Opportunity Programs (EEOP) Kevin Driscoll, Assistant Director, Diversity, 5. Affirmative EEO Program Disability and Recruitment (DDR), Human Official Resource Directorate (HRD) Kevin Driscoll, Assistant Director, DDR, HRD 6. Section 501 Affirmative Action Program Official Patrick Anderson, Program and Complaints 7. Complaint Processing Program Manager Manager, EEOP

EEOC FORM 715- 01 PART A -	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT						
PART D List of	Serviced Componen	t and I	Location (City/State)	CPDF and FIPS codes			
Subordinate Components	Office of the Secretary of Defense (0	Arlington, VA	DD01 8		40		
Covered in This Report	Defense Test Resources Managemer	nt Cente	er (TRMC), Arlington, VA	DD68	88	40	
	Defense Legal Services Agency (DL	SA), A	urlington, VA	DD25	88	40	
	Defense Security Cooperation Agend	cy (DS	CA), Arlington, VA	DD06	88	40	
	Office of Economic Adjustment (OE	EA), Ar	lington, VA	DD23	88	40	
	Pentagon Force Protection Agency (	PFPA),	, Arlington, VA	DD65	88	40	
	U.S. Court of Appeals for the Armed	l Force	s (USCAAF)	DD08	88	40	
	Defense POW/MIA Accounting Age	ency (D	PAA), Arlington, VA	DD58	88	40	
	Defense Technology Security Admir	on (DTSA), Alexandria, VA	DD29 88		40		
	Defense Advanced Research Project	Agenc	y (DARPA), Arlington, VA				
	Washington Headquarters Services (W	/HS), A	Alexandria, VA				
EEOC FORMS and	Documents Included with This Repor	t					
*Executive Summary [FO	RM 715-01 PART E], that includes:	х	*Optional Annual Self-Assessment Checklist Agains [FORM 715-01PART G]	t Essential Elements		X	
Brief paragraph describing related functions	ng the Agency's mission and mission-	X	*EEO Plan to Attain the Essential Elements of a Model EEO Program [FORM 715-01PART H] for each programmatic essential element requiring improvement				
Summary of results of A MD-715 "Essential Elem	gency's annual self-assessment against nents"	X	*EEO Plan to Eliminate Identified Barrier [FORM 715-01 PART I] for each identified barrier				
Summary of Analysis of Work Force Profiles including net change analysis and comparison to RCLF		Х	*Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals with Targeted Disabilities for agencies with 1,000 or more employees [FORM 715-01 PART J]				
Summary of EEO Plan objectives planned to eliminate identified barriers or correct program deficiencies		X	*Copy of Workforce Data Tables as necessary to sup EEO Plans	port Executive Summary	and/or	X	
Summary of EEO Plan a	ction items implemented or accomplished	Х	*Copy of data from 462 Report as necessary to support action items related to Complaint Processing Program deficiencies, ADR effectiveness, or other compliance issues				
*Statement of Establishment of Continuing Equal Employment Opportunity Programs [FORM 715-01 PART F]		Х	*Copy of Facility Accessibility Survey results as necessary to support EEO Acti Plan for building renovation projects				
*Copies of relevant EEO revisions made to EEO P	Policy Statement(s) and/or excerpts from olicy Statements	X	*Organizational Chart			X	

EEOC FORM 715-01 PART E	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
WASHINGTON HE	ADQUARTERS SERVICES DOD	For period covering October 1, 2019 to September 30, 2020		
EXECUTIVE SUMMARY				

#### **AGENCY MISSION**

Washington Headquarters Services (WHS) is the essential services provider for the Office of the Secretary of Defense (OSD), Department of Defense (DoD) agencies, and DoD offices in the National Capital Region. WHS provides a wide range of centralized capabilities to DoD headquarters, OSD, and DoD components, enabling economies of scale for delivering essential administrative services to fulfill the mission of the Department. In 2020, WHS aligned under the Director of Administration and Organizational Policy in the Office of the Chief Management Officer (CMO).

WHS services are organized into several directorates and specialty offices. These teams of WHS personnel support the mission of our Defense Department customers by managing DoD-wide programs and operations for the Pentagon, Mark Center, Raven Rock Mountain Complex, and DoD-leased facilities in the National Capital Region and several locations across the nation. The WHS vision is to remain a creative, results-driven capabilities provider, recognized for excellence: responsible, reliable, resourceful, and relevant.

WHS delivers essential administrative services to assist these components and offices in fulfilling the mission of DoD. Under the leadership of Acting Director Regina F. Meiners, WHS supports the establishment of a model equal employment opportunity (EEO) program as required by the U.S. Equal Employment Opportunity Commission (EEOC), under Management Directive (MD) 715. This report covers WHS and components serviced by WHS.

#### **EQUAL EMPLOYMENT OPPORTUNITY PROGRAM MISSION**

The mission of the Office of Equal Employment Opportunity Programs (EEOP) is to foster an inclusive and respectful workplace environment that allows all personnel to succeed as they support the defense of our nation. Our goals complement the strategic goals of our organization.

The EEOP is responsible for the implementation of: Civilian Equal Employment Opportunity Process, Military Equal Opportunity Process Information and Referral, Affirmative Employment Program, and the Alternative Dispute Resolution Program.

The mission of the Diversity, Disability, and Recruitment (DDR) Division is to foster a diverse workforce and an inclusive work environment that ensures equal opportunity through program development, workforce analysis, recruitment, retention, and awareness to best serve our customers. DDR conducts strategic workforce analysis, evaluation of policies, practices, and procedures that may benefit diversity and inclusion efforts, and the creation of action plans consistent with the development of a model Equal Employment Opportunity, diversity, and inclusive environment. DDR manages recruiting for all special recruitment program functions for the WHS-serviced organizations, including information concerning employment programs for students, recent graduates, veterans, and individuals with disabilities.

DDR also provides Reasonable Accommodations for individuals with disabilities who are applicants or employees of WHS-serviced organizations.

DDR is responsible for preparing the DVAAP, FEORP, MD-715, and for managing Special Employment Programs.

#### MAJOR ACTIVITIES AND ACCOMPLISHMENTS

The following six essential elements of a Model Equal Employment Opportunity Program include the Agency's EEO program and several noteworthy accomplishments in Fiscal Year 2020 (FY 2020).

#### **MODEL EEO PROGRAM STATUS**

During FY 2020, WHS addressed EEO program deficiencies reported in prior years. Specifically, the Agency now conducts trend analysis of the effects of management/personnel policies, procedures, and practices on EEO groups.

The following program deficiencies may still exist in WHS' EEO and Disability programs:

- The Agency's FY 2020 MD-715 report does not include complete workforce data tables, including applicant flow data.
- The Agency's anti-harassment policy does not comply with EEOC guidance.
- The Agency has not posted its Affirmative Action Plan on its public website.
- The Agency has not posted personal assistance services procedures on its public website.
- The Agency has not submitted its updated reasonable accommodation procedures to EEOC for review.
- The Agency does not have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements.

Part H of this report contains WHS planned activities to reach compliance on these deficiencies.

#### **ELEMENT 1: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP:**

WHS Issues Annual Equal Employment Opportunity (EEO) Policy Statements: As is customary each year, five Agency wide EEO policy statements of: Diversity and Inclusion, Prevention of Harassment, Employment and Retention of People with Disabilities, Federal Employee Anti-discrimination and Retaliation Act (no FEAR Act), and Alternative Dispute Resolution (ADR) policies were timely reissued and distributed to the workforce during the EEO, Anti-Harassment, and Diversity Training, as well by electronic distribution.

8th Annual Senior Executive Diversity Seminar (SEDS): Per DoD requirement, DDR sponsored a mandatory 2-day seminar for all senior leaders newly appointed to the grade of Brigadier General or Rear Admiral and all new members of the Senior Executive Service. The 2020 SEDS curricula included a combination of cultural competency, unconscious bias, the New Inclusion Quotient, a government mandate via Executive Order 13583. The seminar was grounded in science-based research and includes thought-provoking interactive exercise and honest dialogue, as relates to mission accomplishment, team performance, and strategic attainment of personnel diversity in order to accomplish the mission of the Department of Defense.

#### **ELEMENT 2. INTEGRATION INTO AGENCY'S STRATEGIC MISSION:**

**EEOP Director Involvement:** The EEOP Director reports directly to the Director of WHS, and met weekly with the Director of WHS. Additionally, she advised the Director of WHS and senior leaders on strategies that promote an environment free of discrimination. In FY 2020, the EEOP Director attended weekly WHS Leadership staff meetings and kept members apprised of EEO trends, progress, and concerns. In addition, the EEOP Director participated in various forums such as the Human Resource Directorate Customer Focus Forum, Senior Administrative Officers Forum, Defense Diversity Working Group, and the WHS Quarterly Facility Access Task Force, creating a close working relationship within the Agency. The Director also attended the Mark Center Building Council meetings to maintain awareness of facilities logistics as relates to architectural barriers.

**State of the Agency Brief:** In FY 2020, the EEOP Director presented the annual State of the Agency EEO Briefing to the WHS Director. The briefing covered an overall assessment of the Agency's performance in each of the six essential elements of the Model EEO Program as well as the progress made in eliminating/reducing barriers to equal opportunity.

**Mandatory Training:** Over six hundred (618) team members completed that WHS mandatory courses which include modules on EEO, Diversity and Inclusion, and ADR.

Special Hiring Authorities: WHS encouraged the use of available hiring authorities, such as Schedule A Excepted Service Hiring Authority (5 CFR 213.3102(u)), Veterans Recruitment Appointment (VRA) authority, the Workforce Recruitment Program for College Students and Recent Graduates with Disabilities (WRP), reasonable accommodations, and operationalizing accessible information and communication technology policies, practices, and procedures. The WHS Acquisition Directorate (AD) accommodated onboard Wounded Warriors' growing needs to prepare them for conversion to the 1102 career field as a competitive acquisition professional.

**Recruitment:** WHS heavily engaged with hundreds and race-, disability- and gender-based groups on a range of universities. Engagement involved the passing along of opportunities and information and specific invitations to attend small recruiting events being conducted on a campus.

#### ELEMENT 3. MANAGEMENT AND PROGRAM ACCOUNTABILITY

In FY 2020, the Agency continued to meet its compliance obligations:

**DVAAP Report:** The report was submitted in November 2019 to the Defense Civilian Personnel Advisory Service. The following accomplishments were highlighted.

- WHS continued to provide one-on-one guidance and training on Reasonable Accommodations (RA) aimed to allow an individual with a disabilities to apply for a job, perform job functions, enjoy equal access to benefits available to other individuals in the workplace; and most importantly, to thrive and advance within the organization. DDR actively shares RA awareness to supervisors and WHS workforce during Customer Focus Forums, town halls, leadership meetings, EEO trainings, and Senior Executive Diversity Seminars (SEDS).
- To fill demand, WHS doubled the size of its Reasonable Accommodations team to support increasing requests and need for interpreters, readers, and Personal Assistance Services (PSA)

- to all WHS directorates. In addition, WHS developed procedures for Personal Assistance Services to provide workplace task related assistance for individuals with disabilities.
- Enhancements to iCompass, the WHS web-based learning management system, provided the entire workforce, including a disabled employee, easy and convenient access to developmental online course, mandatory trainings, and manage Individual Development Plans (IDPs).
- To assist disabled veterans in their development and career advancement, WHS also offered and promoted several DoD and WHS competitive development programs, which were open to all qualified candidates to disabled veterans and under-represented groups.
- In FY 2020, 112 veterans were promoted through career ladder promotions and merit promotion process, representing a decrease from 136 promotion in FY 2019. Merit promotional opportunities are advertised on USAJOBS, which is open and accessible to all veterans and applicants. Additionally, many veterans are hired at the full performance level, as WHS serves the highest echelon within the Department.

**FEORP Report:** The report, submitted to DoD in November 2020, included a short narrative of the Agency's promising practices, strategies and activities related to Hispanic Employment, Mentoring, Career Development, and Recruitment of Individuals with Disabilities. The following accomplishments were highlighted:

#### **Workforce Recruitment Plan**

The Workforce Recruitment Plan developed by the Human Resources Directorate (HRD), serves as a strategic recruitment guide to Special Employment Programs (SEP) Program Managers, Customer Service Account Managers (CAMs), and Administrative Officers (AOs). The purpose of this plan is to foster a diverse workforce and an inclusive environment that ensures equal opportunity, leveraging Critical Success Factors (CSFs) through which WHS must excel in order to succeed. WHS has leveraged this plan to help the organizations it supports hire qualified and talented individuals and hard-to-fill positions, while addressing low representation rates of various workforce groups as compared to their availability in the National Civilian Labor Force (NCLF).

The HRD Talent Acquisition team spearheads the recruiting and hiring efforts across its service organizations to fill crucial positions and hard to fill jobs with diverse talent. Strategic recruiting initiatives with the Pentagon Force Protection Agency (PFPA) and Facilities Services Directorate (FSD) helped narrow staffing gaps. The Talent Acquisition team effectively manages internship programs to fulfill strategic recruiting efforts, find potential talent, and ultimately hire top candidates.

Amid COVID, WHS increased the number of university partnerships and affinity groups by 35% through continued engagement and optimization of virtual recruiting platforms and technologies. We continue to conduct information sessions, campus interviews, resume workshops, and build strong relationships with campus career centers and recruiters to acquire and qualified applicants to participate in our SEPs. In FY 2020, we've engaged with over 54 universities, Hispanic Serving Institutions (HSIs), Historically Black Colleges and Universities (HBCUs), and academic institutions serving People with Disabilities (PwD) to recruit a diverse talent pool that resulted to receiving hundreds of applications across numerous occupational fields.

#### **Senior Executive Diversity Seminar (SEDS)**

The SEDS is a biannual requirement and fulfills DoD Directive 1350.2 "Department of Defense Military Equal Opportunity (MEO) Program," to provide a mandatory 2-day Senior Executive Equal Opportunity Seminar (SEEOS) to all officers newly appointed to the grade of brigadier

general or rear admiral (lower half) and all new members of the Senior Executive Service. The training introduces senior executives to key elements surrounding diversity, to include both representation and inclusion. This offering places extra emphasis on diversity and inclusion, providing techniques on how to proactively leverage diversity to advance organizational missions and reduce the instances of equal employment opportunity complaints. The seminar heavily relies upon interactive activities, including a short presentation from all participants.

Preparation and delivery of the SEDS, including all diversity and inclusion in-person trainings, were put on hold in FY 2020 due to health and safety limitations imposed by the unprecedented pandemic, and per the U.S. Office of Personnel Management (OPM) guidance "Mandatory Review of Employee Training under Executive Order 13950 September 22, 2020," directing all federal agencies to put a pause on all diversity and inclusion trainings until further OPM review and approval before they are used, even if those materials have been utilized in the past.

#### **Special Employment Programs**

In support of recruiting and employing diverse talent, WHS engaged in targeted talent acquisition efforts to seek out and hire qualified candidates. DDR actively promotes and collaborates with WHS serviced organizations the benefits and value of SEPs and shared OPM resources to recruit, hire, and retain people with disabilities, Hispanics, and under-represented groups. We work with hiring managers, CAMs and WHS serviced organization customers to provide guidance, training, and awareness of special hiring authorities to include: Schedule A, Pathways Program, Volunteer Student Internship Programs (VSIP) and other competitive hiring authorities.

In FY 2020, DDR launched the inaugural cohort of the John S. McCain Strategic Defense Fellows Program, a one-year civilian leadership development program aimed to attract and retain diverse talented individuals with advanced degrees for the commencement of a career track toward senior leadership in the DoD. The inaugural cohort attracted over 87 qualified and diverse applicants from across the U.S.

#### Communication

In addition to optimizing virtual recruiting platforms, WHS collaborates with the Public Affairs communication team and serviced organizations. In addition, WHS utilizes various communication platforms (social media, blogs, InfoNet, newsletters, articles, etc.) to post job announcements, upcoming events, diversity and inclusion efforts, training, workshops, and hiring efforts to broaden reach of diverse highly desired candidates, fill crucial positions, and promote WHS organization's diverse and inclusive workplace culture.

#### **Demographic Dashboards**

The HRD provided leadership reports on Individuals with Targeted Disabilities (IwTDs) and highlighted those components that had met or exceeded our goal of 2% employees with targeted disabilities. DDR also implemented its goal of providing each WHS component with a demographic analysis of the component's populations to inform workforce planning to include recruiting and succession planning. The demographic dashboard includes the following analyses: overall race, gender, national origin (RGNO); senior grades by RGNO and disability status; major occupations by RGNO and disability status; onboard ratio of individuals with targeted and reportable disabilities; veterans; generations; and retirement eligibility.

#### **ELEMENT 4. PROACTIVE PREVENTION**

**Reasonable Accommodations (RA):** WHS ensured all new employees were aware of the RA program and assistive technologies available to modify workspaces and/or effectively help those requesting accommodations with their acclimation to the workplace. Requests for RA were processed within the 30-day timeframe required by Administrative Instruction 114.

**Anti-Harassment Policy Statement:** The FY 2020 Anti-Harassment policy statement was signed and distributed to the workforce, as well as provided as part of the following training modules: EEO & Diversity, HR & Leadership for New Supervisors, and Team Leader Training. The formal anti-harassment procedures that are separate from the EEO process are currently in coordination to be implemented as a WHS administrative instruction.

**PWD Reports (Leadership Meeting):** The Agency continued to provide reports to Senior Leaders on a quarterly basis. The report provided data analysis, trends, and the status of the Individuals with Disabilities (IWD) workforce for each Directorate. The Agency's Senior Leaders are committed to increasing and promoting diversity and inclusion, as well as achieving and retaining the DoD goal of 2% of hiring IwTDs. The continued goal for the next fiscal year is to place a strategic focus on increasing and retaining the numbers of IWD within the Agency. DDR also educated WHS about the EEOC goal for federal agencies of 12% employees with reportable disabilities.

#### **ELEMENT 5. EFFICIENCY**

Alternate Dispute Resolution (ADR): The ADR Program provided essential services that contributed to the WHS mission by helping employees resolve disputes, address workplace concerns, and manage conflict when it arises. Additionally, the ADR Program provided managers with services to assist in assessing the workplace environment so that issues can be addressed early. In FY 2020, the ADR Program conducted 25 mediations to address EEO complaints of alleged discrimination with a 48% resolution rate and 7 sessions to address non-EEO workplace issues with a 57% resolution rate. The office also facilitated nine climate surveys, three sensing sessions, and three group facilitations. Other activities included conducting ten training sessions titled "Basics of Conflict Management and the ADR Process." EEOP hosted its annual ADR Symposium with workshops, speakers, and various displays showing the benefits and examples of what to expect within the ADR process. The EEO Complaints Manager and the EEO Specialists actively encourage the use of ADR at each stage of the complaint process, providing positive information on ADR and its benefits in EEO related matters.

**CMO Office of the Ombudsman:** The Office of the Ombudsman provided an informal and confidential forum to hear and help address individual and systemic organizational concerns. In 2020 the Office of the Ombudsman received 263 visitors addressing 382 issues.

**Complaints (Status and Update):** During FY 2020, 77 pre-complaints resulted in 44 individuals filing formal complaints. There were ten settlements and twenty-three withdrawals (no complaints filed). Most of the formal EEO complaints were based on claims of sex, reprisal, race, disability, and/or age discrimination. ADR was offered 25 times (reflecting approximately a 32% offer rate) and 24 individuals (96%) elected ADR. The Agency continued to utilize the MicroPact iComplaints software to track and process complaints in accordance with regulatory timelines.

#### ELEMENT 6. RESPONSIVENESS AND LEGAL COMPLIANCE

**Compliance with EEOC:** WHS fully complied with all Laws, including EEOC Regulations, Orders, Decisions, and Settlements Agreements. All documents requiring legal sufficiency review were coordinated with WHS, Office of General Counsel (OGC). EEOP posted all required No FEAR Act information, provided required training, and timely filed MD-715, EEOC Form 462 reports, and other reports required by EEOC and OPM. WHS timely implemented necessary corrective actions such as facility postings, training, and reviewed disciplinary actions as appropriate.

**Office of General Counsel:** EEOP continued to maintain a cooperative relationship with WHS OGC and DPAA OGC and consulted on legal issues, matters of mutual interest and sought advice and expertise when dealing with unique situations.

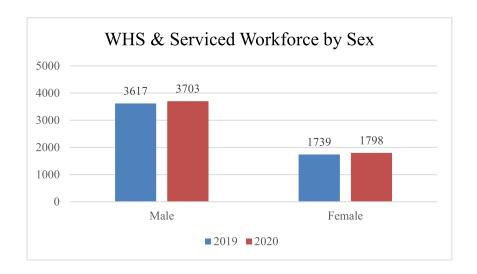
**EEO Investigations:** Investigations were completed by the DoD, Defense Human Resources Activity (DHRA), Diversity Management Operations Center (DMOC), Investigations and Resolutions Directorate (IRD). EEOP does not control the timeframes for investigations but expected IRD to adhere to the 180 calendar-day timeframe allowed for such investigations. EEOP took proactive steps to ensure that IRD was timely notified of a request for investigations, submitted case files prior to their request for documents, and responded to requests in a timely manner.

**EEO, Diversity, and HR Training**. WHS proactively engaged in various training efforts that had as a foundation, the EEOC compliance requirements. Trainings included unlawful discrimination on protected bases (to include race and disability), and an overview of WHS workforce statistics based on race, gender, national origin, and disability. One thousand two hundred seventy-four employees, including managers, and team leads received classroom style EEO, Anti-Harassment and Diversity training; the module also included the reasonable accommodations process. The HRD Individual and Organizational Development Division (I&OD) continued to train new supervisors to address challenges they may encounter and provide the knowledge, skills, and tools necessary to successfully manage a diverse workforce.

#### **WORKFORCE ANALYSIS**

This year's workforce analysis provides information regarding the current composition of the WHS and Serviced Component workforce and identified multi-year employment trends impacting the workforce as a whole. Demographic data was extracted from the Business Objects Enterprise Reporting Service (BOERS). The U.S. Census Bureau 2010 National Civilian Labor Force (NCLF)<sup>1</sup> census data was used as a benchmark.

At the end of FY 2020, the total workforce (permanent and temporary) of WHS and serviced components increased from 5,356 to 5,501 representing a positive net change of 2.71%. The overall workforce consists of 3,703 (67.32%) males and 1,798 (32.68%) females, representing a net change of 2.38% and 3.39%, respectively.



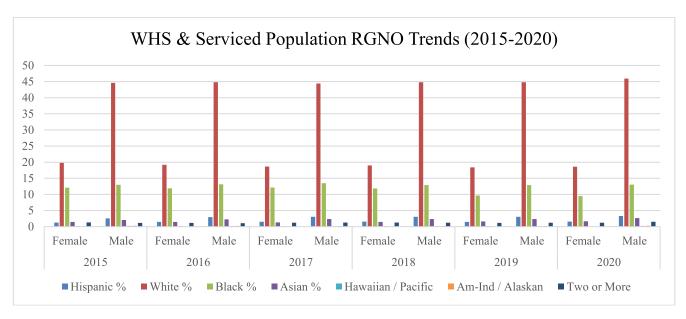
Hispanics (males and females) and White females have low participation rates when compared to the appropriate benchmarks (*Table A-1*):

- Hispanic males 3.33% versus NCLF of 5.17%
- Hispanic females 1.55% versus NCLF of 4.79%
- White females 18.58% versus NCLF of 34.03%

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<sup>&</sup>lt;sup>1</sup> The NCLF is derived from the United States Census and reflects persons 16 years of age or older who were employed or seeking employment, excluding those in the Armed Services. NCLF data used in this report is based on the 2010 Census.

The overall representation of WHS and Serviced Component employees by race/national origin has remained relatively constant over the last five years. Hispanic representation largely remained steady during this period, but remains below the NCLF; for their respective demographics, males are -1.84% below the NCLF; females -3.23% below the NCLF. Representation of White females has steadily declined. White male representation exceeds the NCLF by 7.74%, which is slightly lower than 2019's differential. Data reflects a greater than expected representation of Black and Native Hawaiian/Pacific Islander employees, as well as employees who identified as two or more races. Conversely, representation of Asian representation is lower than expected when compared to the NCLF (*Table A-1*).



	2015		2016		2017		2018		2019		2020	
	Female	Male										
Hispanic %	1.26	2.55	1.46	2.96	1.51	3.07	1.55	3.05	1.48	3.05	1.55	3.33
White %	19.78	44.57	19.2	44.77	18.63	44.42	18.99	44.81	18.41	44.81	18.58	45.92
Black %	12.11	12.99	11.87	13.13	12.15	13.46	11.86	12.89	9.66	12.89	9.47	13.02
Asian %	1.47	2.06	1.45	2.28	1.34	2.39	1.47	2.35	1.63	2.35	1.69	2.64
Hawaiian / Pacific	0.15	0.23	0.17	0.2	0.13	0.15	0.13	0.15	0.11	0.15	0.09	0.24
Am-Ind / Alaskan	0.1	0.29	0.06	0.24	0.07	0.2	0.07	0.2	0.02	0.2	0.04	0.27
Two or More	1.32	1.17	1.15	1.08	1.2	1.28	1.27	1.21	1.18	1.21	1.2	1.55

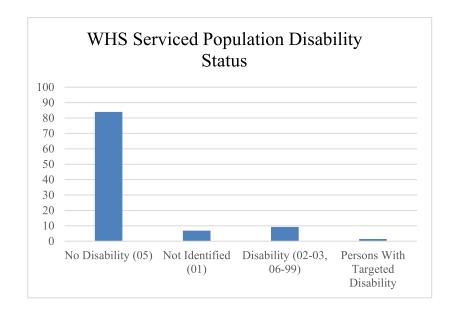
DoD adopted the Federal goal of 2% for hiring PWTD; in addition, WHS strives to meet the goal of 12% of on-board employees with reportable disabilities.<sup>2</sup> In FY 2020, the Agency hired 43 employees (6.66%) who reported having a disability and 11 employees (1.70%) who reported having a targeted disability. PWTD comprise 1.49% of the workforce of WHS and Serviced Components and increase of 0.26% from 2019. Employees with reportable disabilities are now 9.22% of the total workforce, compared to 8.79% at the end of FY 2019 (*Table B1*).

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<sup>&</sup>lt;sup>2</sup> EEOC uses the Federal goal (2%) for IwTDs as a benchmark because there is no NCLF for persons with targeted disabilities. This 2 % goal is tied to EEOC's Leadership for the Employment of Americans with Disabilities Initiative. Similarly, the EEOC adopted a Federal goal (12%) of people with reportable disabilities in the Final Rule on Affirmative action for People with Disabilities in Federal Employment, 84 FR 654 (January 3, 2017).

When compared to the Federal goals for employment of people with disabilities:

- $PwD^3 9.22\%$  versus Federal goal of 12%
- PWTD<sup>4</sup> 1.49% versus Federal goal of 2%



#### **Upward Mobility Analysis**

Consistent with MD-715's requirement to assess whether any policy, practice, procedure, or condition led to a negative correlation with race, national origin, gender, or disability, WHS reviewed demographic data to determine whether particular groups are hindered from reaching the highest levels of leadership despite their presence in positions that comprise the feeder pools. Additionally, EEOC instructs agencies to identify instances where the participation rate for a group occupying a higher-level position is lower than the corresponding participation rate in the lower-level feeder pools for that positions (*Tables A and B 3-1*, 3-2; A and B 4-1; A and B 4-2; A and B 11; and A and B 13).

In FY 2020, the following groups had a lower representation rate at the higher pay levels as compared to the NCLF:

- Hispanic males at GS-14 and above
- Hispanic females at SES
- White Males at GS-8 and -9.
- White females at GS-7 and -11
- African American males at GS-14 and above
- African American females at GS-15 and above
- Asian females at GS-15
- Employees with targeted disabilities at GS-15 and above

<sup>&</sup>lt;sup>3</sup>Reportable disabilities is a physical or mental impairment that substantially limits one or more major life activities (*e.g.* caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing or learning) or a record of such impairment.

<sup>&</sup>lt;sup>4</sup>PWTD are a subset of those who have a reportable disability. The criteria EEOC used to select "targeted disabilities" included the severity of the disability the feasibility of recruitment, and the availability of workforce data for this group. OPM modified the definition in 2010 and again in 2016. Targeted disabilities are listed on Table B1-14.

#### **Applicant Flow Data**

In FY 2016, HRD acquired access to the applicant flow data directly from the OPM's USA Staffing Manager system. Due to lingering technical issues, WHS again received less than comprehensive applicant flow data for FY 2020, precluding sufficient analysis.

#### **Major Occupations**

WHS has seven major occupation groups: general attorney (0905), miscellaneous administration and programs (0301), information technology management (2210), police (0083), management and program analysis (0343), foreign affairs (0130), and security administration (0080). In FY 2020, there were 4,582 permanent employees. Of these permanent employees, there were 175 contracting officers, 655 miscellaneous administration and programs specialists, 107 information technology specialists, 693 police officers, 534 management and program analysts, and 214 foreign affairs specialists. Total males for all but contracting officers participated above the occupational National Civilian Labor Force (NCLF) rates. There were several instances where WHS' employee strength was more than 5% below their occupational NCLF rates, to include White females in all major occupations except 0343 and 1102 and White males in series 1102. Hispanics were underrepresented in all major occupations except for males in the 0803 series. Black/African Americans were strong except in the 0130 job series (*Table A6*).

#### New Hires

WHS and serviced components hired 361 permanent and 286 temporary employees in FY 2020. Overall, females were hired for permanent positions (35.46%) at a lower rate than males (64.54%). Whites (66.77%) were hired at almost five times the rate of Black/African Americans (16.39%); the next highest hire rate was Asians at 6.64%. A total of 25 Hispanics were hired at a rate of 3.87%. There were 7 permanent and 4 temporary PWDs hired in FY 2020 (*See Table B7 & B7T*).

#### **Employee Recognition and Awards**

A review of *Table A9* reflects that males were given more time-off awards than females, as a percent of the workforce. Males received 67.59% of all time-off awards as compared to approximately 32.41% of all time-off awards to females. Similarly, males received a higher percentages of cash awards than females. Consistent with representation in the workforce, White and Black employees received the highest percentage of recognition and awards.

On average, in the category of cash awards \$100-\$500, females received higher cash awards than males (\$424.43 versus \$389.03). A review of *Table B9* depicts the average cash award for PWD was commensurate with all employees across all categories (*See Tables A13 & B13*).

#### **Selections for Internal Competitive Promotions for Major Occupations**

At this juncture, WHS does not have access to applicant flow data for internal selections, but will have access to that information through the USA Staffing Cognos application for FY 2020 (*Table A9*).

#### **Employee Separations**

There was a total of 651 employee separations, of which 95.4% were Voluntary and 4.6% were Involuntary (*Tables A14 & B14*). Females voluntarily separated at 34.1%, which is higher than overall

representation at 32.68%. Of the 651 separations, 19 (2.9%) were Hispanic, 455 (69.89%) were White, 121 (18.5%) were African American, 30 (4.6%) were Asian, 3 (0.46%) were Native Hawaiian or Pacific Islander, and 16 (2.46%) were Two or More Races. There were 30 involuntary separations of which 40% were females and 60% males. White males, White females, Hispanic females, and Asian males were involuntarily separated at rates higher than their representation in the workforce. There were 11 PwTD (1.69%) who voluntary separated from the Agency and 1 PwTD (3.33%) who was involuntarily separated, both of which was above their representation in the overall workforce.

#### **Hispanics in the Federal Workforce**

The following triggers were identified:

#### Total workforce:

- Hispanic males 3.33% versus NCLF of 5.17%
- Hispanic females 1.55% versus NCLF of 4.79%

#### Upward mobility analysis:

The following groups had a lower representation rate at the higher pay level as compared to the pay distribution of the total workforce:

- Hispanic males at GS-14 and above
- Hispanic females at GS-14 and above

Hispanic males and females progressed to GS-13 before registering a decrease in representation at the SES level.

#### Major occupations (Table A6, Permanent):

Hispanics were well underrepresented in all major occupations with the exception of males being overrepresented in the 0083 series.

#### New Hires (Table A8):

A total of 25 Hispanics were hired at a rate of 3.86%. Both males and females were hired at rates lower than their presence in the NCLF.

#### Separations (Table A14):

Nine (9) females (1.38%) and 10 males (1.54%) were separated. There was 1 (0.15%) involuntary separation. Voluntary separations were well below NCLF representation.

#### Solutions:

HRD provides periodic updates to leadership and the workforce on the recruitment and employment of Hispanics/Latinos. Also, consistent with the WHS Targeted Recruitment Plan, HRD provides feedback about current office operations with the goal of determining alternative methods to increase the success of the office's programs. The Plan is based on participation and efforts of WHS leadership, directorates, and

offices, and the HRD Recruitment and Outreach specialists. HRD requested that each office assign a representative to partner with the recruitment and outreach specialists. In 2016, HRD established Customer Account Managers (CAMS) to serve as liaisons between HRD and the customer. The CAMS:

- provide feedback to HRD about operations of their assigned customers;
- assist customers with determining alternative methods to increase the success of the office's programs through utilization of special appointment authorities (e.g., Student Education Employment Program, Temporary Summer Hire Authority, Presidential Management Intern (PMI) authority);
- partner with customers and DDR on opportunities for recruitment and advancement of employees with targeted disabilities, to include Hispanic/Latinos; and
- assist customers with developing customer-specific, office-specific, and occupation-specific hiring from the Hispanic/Latino community.

WHS utilizes student outreach and the Pathways Recent Graduates and Internship programs to broaden WHS' recruitment reach into educational institutions with diverse populations, to include Hispanics/Latinos. We continue to advertise internships, both paid and unpaid, at Hispanic Serving Institutions (HSIs).

HRD, DDR coordinated with the Public Affairs communication team to implement social media recruitment through social media platforms such as: LinkedIn, Facebook, Twitter, and through the DoD Blog. Posted content to include job fairs, new position opportunities, upcoming events, and more relating to the DDR program with a goal to reach a broader audience of highly desired candidates, inclusive of Hispanics/Latinos, to fill the crucial positions in IT, security, and cybersecurity.

#### The Way Ahead

WHS will renew its barrier analysis effort for 2020, with an attendant review of WHS's policies, practices to leverage diversity, and inclusion in areas to include: recruitment, performance management, training, learning and development, and mentoring. WHS will use data driven strategies to advance representational diversity and inclusion through its 2020 Targeted Recruitment Plan with focus on Hispanic males and females, White females, and People with Disabilities.

As part of the recruitment and training strategies, WHS will integrate social media to publicize use of the special hiring authorities and positions in major occupations with underrepresentation of certain groups. We will incorporate more training of DDR employees and collaboration with customers and customer account managers (CAMS), who are assigned to facilitate human resources services to specific customers in our serviced populations.

WHS will utilize applicant flow data to identify potential barriers to hiring a diverse workforce, and review hiring processes to provide recommendations on the removal of barriers to the inclusion of candidates with disabilities and targeted disabilities.

WHS will continue to develop and advocate for the business case for the establishment of the consolidated reasonable accommodations fund (CRAF).

WHS will continue to develop and implement required policies.

EEOC FORM 715-01 PART F

## U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

## CERTIFICATION of ESTABLISHMENT of CONTINUING EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS

I, Regina F. Meiners, am the Principal EEO Director/Official for Washington Headquarters Services (WHS) and WHS serviced components.

Principal EEO Director/Official for

Washington Headquarters Services

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

The Agency 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.

MEINERS.REGINA.F Digitally signed by ACCHINA.12321225 MEINERS.REGINA.FACCHINA.123

24 Date: 2021.07.21 15:15:47 -04'00'

Regina F. Meiners Acting Director, WHS July 21, 2021

Date

EEOC FORM 715-01 PART G

#### U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

**Washington Headquarters Services** 

For period covering October 1, 2019 to September 30, 2020

#### AGENCY SELF-ASSESSMENT CHECKLIST MEASURING ESSENTIAL ELEMENTS

#### 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.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the Agency's status report
Measures		Yes	No	
Was the EEO policy statement issued within 6 - 9 months of the installation of the Agency Head? If no, provide an explanation.				
During the current Agency Head's tenure, has the EEO policy statement been re-issued annually? If no, provide an explanation.				
	Are new employees provided a copy of the EEO policy statement during orientation?			
	promoted into the supervisory ranks, is of the EEO policy statement?	X		
Compliance Indicator	EEO policy statements have been communicated to all employees.	Measure has been met		
Measures	communicated to an employees.	Yes	No	
Have the heads of subordinate reporting components communicated support of all Agency EEO policies through the ranks?		X		
Has the Agency made written materials available to all employees and applicants, informing them of the variety of EEO programs and administrative and judicial remedial procedures available to them?		X		
	inently posted such written materials in all O offices, and on the Agency's internal <b>R §1614.102(b)(5)</b> ]	X		

Compliance Indicator	Agency EEO policy is vigorously enforced by Agency management.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the Agency's status report
Measures			No	
	ervisors evaluated on their commitment to and principles, including their efforts to:			
	lisagreements and other conflicts in their ironments as they arise?	X		
	whether perceived or real, raised by wing-up with appropriate action to correct in the workplace?	X		
mission personnel to	y's EEO program through allocation of participate in community out-reach and as with private employers, public schools and	X		
	ation of employees under his/her supervision icials such as EEO Counselors, EEO	X		
	e that is free from all forms of ssment and retaliation?	X		
communication and most effectively in a	inate supervisors have effective managerial, interpersonal skills in order to supervise a workplace with diverse employees and ng from ineffective communications?	X		
	on of requested religious accommodations odations do not cause an undue hardship?	X		
qualified individuals	on of requested disability accommodations to s with disabilities when such not cause an undue hardship?	X		
	een informed about what behaviors are orkplace and that this behavior may result in	X		
	were utilized by the Agency to so inform its enalties for unacceptable behavior.			Publication of Administrative Instruction 8, Disciplinary and Adverse Actions (posted on WHS website)

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

#### Essential Element B: Integration of EEO into the Agency's Strategic Mission

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

discrimination in ai	ny of the Agency's policies, procedures or prac	THE S ALL	ı suppo	its the Agency's strategic mission.
Compliance Indicator	Indicator Program provides the Principal EEO Official with appropriate authority		sure peen et	For all unmet measures, provide a brief explanation in the space below or complete and attach an
Measures	and resources to effectively carry out a successful EEO Program.	Yes	No	EEOC FORM 715-01 PART H to the Agency's status report
Is the EEO Director head? [see 29 CFR	r under the direct supervision of the Agency §1614.102(b)(4)]	X		
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?)				
Are the duties and responsibilities of EEO officials clearly defined?				
	Do the EEO officials have the knowledge, skills, and abilities to carry out the duties and responsibilities of their positions?			
organizational char	If the Agency has 2 <sup>nd</sup> level reporting components, are there organizational charts that clearly define the reporting structure for EEO programs?			Not Applicable
Agency wide EEO	If the Agency has 2 <sup>nd</sup> level reporting components, does the Agency wide EEO Director have authority for the EEO programs within the subordinate reporting components?			Not Applicable
	If not, please describe how EEO program authority is delegated to subordinate reporting components.			Not Applicable
Compliance Indicator			sure peen et	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the Agency's status report
Measures			No	the Agency's status report

Does the EEO Director/Officer have a regular and effective means of informing the Agency head and other top management officials of the effectiveness, efficiency, and legal compliance of the Agency's EEO program?				
Following the submission of the immediately preceding FORM 715-01, did the EEO Director/Officer present to the head of the Agency and other senior officials the "State of the Agency" briefing covering all components of the EEO report, including an assessment of the performance of the Agency in each of the six elements of the Model EEO Program and a report on the progress of the Agency in completing its barrier analysis including any barriers it identified and/or eliminated or reduced the impact of?				
Are EEO program officials present during Agency deliberations prior to decisions regarding recruitment strategies, vacancy projections, succession planning, selections for training/career development opportunities, and other workforce changes		X		
Does the Agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions such as reorganizations and re-alignments?		X		
practices exan there are hidde of opportunity	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)]			
planning, especiall regarding succession	Is the EEO Director included in the Agency's strategic planning, especially the Agency's human capital plan, regarding succession planning, training, etc., to ensure that EEO concerns are integrated into the Agency's strategic mission?			
Compliance Indicator	The Agency has committed sufficient human resources and budget allocations to its EEO programs to ensure	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an
Measures	suggessful apprection		No	EEOC FORM 715-01 PART H to the Agency's status report
Does the EEO Director have the authority and funding to ensure implementation of Agency EEO action plans to improve EEO program efficiency and/or eliminate identified barriers to the realization of equality of opportunity?		X		
Are sufficient personnel resources allocated to the EEO Program to ensure that Agency self-assessments and self-analyses prescribed by EEO MD-715 are conducted annually and to maintain an effective complaint processing system?		X		
Are statutory/regul Programs sufficien	atory EEO related Special Emphasis tly staffed?	X		

Federal Women's Program - 5 U.S.C. 7201; 38 U.S.C. 4214; Title 5 CFR, Subpart B, 720.204				
Hispanic Employment Program - Title 5 CFR, Subpart B, 720.204				
People with Disabilities Program Manager; Selective Placement Program for Individuals with Disabilities - Section 501 of the Rehabilitation Act; Title 5 U.S.C. Subpart B, Chapter 31, Subchapter I-3102; 5 CFR 213.3102(t) and (u); 5 CFR 315.709		X		
Are other Agency special emphasis programs monitored by the EEO Office for coordination and compliance with EEO guidelines and principles, such as FEORP - 5 CFR 720; Veterans Employment Programs; and Black/African American; American Indian/Alaska Native, Asian American/Pacific Islander programs?		X		Programs are monitored by the Office of EEO Programs
Compliance Indicator			sure been et	For all unmet measures, provide a brief explanation in the space below or complete and attach an
<b>Measures</b>	Programs.	Yes	No	EEOC FORM-715-01 PART H to the Agency's status report
a thorough barrier	Are there sufficient resources to enable the Agency to conduct a thorough barrier analysis of its workforce, including the provision of adequate data collection and tracking systems?			
when desired, all processing program	budget allocated to all employees to utilize, EEO programs, including the complaint m and ADR, and to make a request for modation? (Including subordinate level ents?)	X		
EEO materials (e.	secured for publication and distribution of g., harassment policies, EEO posters, modations procedures, etc.)?	X		
Is there a central fund or other mechanism for funding supplies, equipment and services necessary to provide disability accommodations?				
Does the Agency fund major renovation projects to ensure timely compliance with Uniform Federal Accessibility Standards?		X		
Is the EEO Program allocated sufficient resources to train all employees on EEO Programs, including administrative and judicial remedial procedures available to employees?				
	funding to ensure the prominent posting of n all personnel and EEO offices? [see 29 2(b)(5)]	X		

Is there sufficient funding to ensure that all employees have access to this training and information?	x
Is there sufficient funding to provide all managers and supervisors with training and periodic up-dates on their EEO responsibilities:	
- for ensuring a workplace that is free from all forms of discrimination, including harassment and retaliation?	X
- to provide religious accommodations?	X
- to provide disability accommodations in accordance with the Agency's written procedures?	X
- in the EEO discrimination complaint process?	X
- to participate in ADR?	X

**Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY**This element requires the Agency Head to hold all managers, supervisors, and EEO Officials responsible for the effective implementation of the Agency's EEO Program and Plan.

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

to review its Empl	schedules been established for the Agency oyee Development/Training Programs for hat may be impeding full participation in iies by all groups?	X		
Compliance Indicator	When findings of discrimination are made, the Agency explores whether or	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an
Measures	not disciplinary actions should be taken.	Yes	No	EEOC FORM 715-01 PART H to the Agency's status report
	nave a disciplinary policy and/or a table of rs employees found to have committed	X		
as to the penalties	s, supervisors, and managers been informed for being found to perpetrate discriminatory ing personnel actions based upon a	X		
Has the Agency, when appropriate, disciplined or sanctioned managers/supervisors or employees found to have discriminated over the past two years?				N/A – One finding of discrimination where the management official is no longer with the Agency.
If so, cite num	ber found to have discriminated and list penal	ty /discip	linary a	ction for each type of violation.
comply with EEO	oromptly (within the established time frame) C, Merit Systems Protection Board, Federal uthority, labor arbitrators, and District Court	X		
decisions/actions t	eview disability accommodation o ensure compliance with its written alyze the information tracked for trends,	X		
Requires that the A	t <b>D: PROACTIVE PREVENTION</b> Agency head makes early efforts to prevent discretionity in the workplace.	criminato	ory actio	ons and eliminate barriers to equal
Compliance Indicator	Analyses to identify and remove unnecessary barriers to employment	Mea has l	been	For all unmet measures, provide a brief explanation in the space below or complete and attach an
Measures	are conducted throughout the year.	Yes	No	EEOC FORM 715-01 PART H to the Agency's status report
and/or other EEO	rs meet with and assist the EEO Director Program Officials in the identification of the impeding the realization of equal ctunity?	X		
implement, with th	identified, do senior managers develop and the assistance of the Agency EEO office, on Plans to eliminate said barriers?	X		

Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into Agency strategic plans?		X		
Are trend analyses of workforce profiles conducted by race, national origin, sex, and disability?		X		
Are trend analyses of the workforce's major occupations conducted by race, national origin, sex, and disability?		X		
	es of the workforce's grade level distribution, national origin, sex, and disability?	X		
Are trend analyses of the workforce's compensation and reward system conducted by race, national origin, sex, and disability?		X		
Are trend analyses of the effects of management/personnel policies, procedures, and practices conducted by race, national origin, sex and disability?		X		
Compliance Indicator	The use of Alternative Dispute Resolution (ADR) is encouraged by senior management		sure been et	For all unmet measures, provide a brief explanation in the space below or complete and attach an
Measures			No	EEOC FORM 715-01 PART H to the Agency's status report
Are all employees encouraged to use ADR?		X		
Is the participation of supervisors and managers in the ADR process required?		X		

### **Essential Element E: EFFICIENCY**

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

Compliance Indicator	The Agency has sufficient staffing, funding, and authority to achieve the		sure peen et	For all unmet measures, provide a brief explanation in the space below or complete and attach an
Measures	elimination of identified barriers.	Yes	No	EEOC FORM715-01 PART H to the Agency's status report
Does the EEO Office employ personnel with adequate training and experience to conduct the analyses required by MD 715 and these instructions?		X		
Has the Agency implemented an adequate data collection and analysis systems that permit tracking of the information required by MD 715 and these instructions?		X		See Part
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?				N/A – WHS does not have subordinate EEO offices.

place to coordinate	ed Agency official or other mechanism in e or assist with processing requests for odations in all major components of the	X		
	amodation requests processed within the time he Agency procedures for reasonable	X		
Compliance Indicator			sure been et	For all unmet measures, provide a brief explanation in the space below or complete and attach an
Measures	Aganey's FFO Programs		No	EEOC FORM715-01 PART H to the Agency's status report
Does the Agency 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 the Agency's complaint resolution process?		X		
Does the Agency's tracking system identify the issues and bases of the complaints, the aggrieved individuals/complainants, the involved management officials, and other information to analyze complaint activity and trends?		X		
Does the Agency hold contractors accountable for delay in counseling and investigation processing times?		X		
	nt of Work in the contract provides stipulation of work to be performed. IRD moni			
Does the Agency monitor and ensure that new investigators, counselors, including contract and collateral duty investigators, receive the 32 hours of training required in accordance with EEO Management Directive MD-110?		X		
counselors, investi investigators, rece	monitor and ensure that experienced gators, including contract and collateral duty we the 8 hours of refresher training required in accordance with EEO Management?	X		
Compliance Indicator	The Agency has sufficient staffing, funding and authority to comply with the time frames in accordance with the		sure been et	For all unmet measures, provide brief explanation in the space
Measures	EEOC (29 C.F.R. Part 1614) regulations for processing EEO complaints of employment discrimination.	Yes	No	below or complete and attach an EEOC FORM715-01 PART H to the Agency's status report
	n place that compares the Agency's applaint processes with 29 C.F.R. Part 1614?	X		

Does the Agency provide timely EEO counseling within 30 days of the initial request or within an agreed upon extension in writing, up to 60 days?		X		
Does the Agency provide an aggrieved person with written notification of his/her rights and responsibilities in the EEO process in a timely fashion?		X		
	cy complete the investigations within the cribed time frame?		X	See Part H-6
	ninant requests a final Agency decision, does ue the decision within 60 days of the	X		See Part H-6
immediately up	ainant requests a hearing, does the Agency con receipt of the request from the EEOC AJ restigative file to the EEOC Hearing Office?	X		
When a settlement agreement is entered into, does the Agency timely complete any obligations provided for in such agreements?		X		
	cy ensure timely compliance with EEOC AJ h are not the subject of an appeal by the	X		
		Measure has been met		For all unmet measures, provide a
Indicator	resolution process and effective systems for evaluating the impact and			brief explanation in the space below or complete and attach an
Indicator  Measures	resolution process and effective systems			brief explanation in the space
Measures  In accordance with established an ADR	resolution process and effective systems for evaluating the impact and effectiveness of the Agency's EEO	m	et	brief explanation in the space below or complete and attach an EEOC FORM715-01 PART H to
In accordance with established an ADR formal complaint st  Does the Agency rereceive ADR training 1614) regulations, winterest in encourage	resolution process and effective systems for evaluating the impact and effectiveness of the Agency's EEO complaint processing program.  29 C.F.R. §1614.102(b), has the Agency Program during the pre-complaint and	Yes	et	brief explanation in the space below or complete and attach an EEOC FORM715-01 PART H to
In accordance with established an ADF formal complaint st  Does the Agency rereceive ADR training 1614) regulations, winterest in encourage benefits associated  After the Agency has	resolution process and effective systems for evaluating the impact and effectiveness of the Agency's EEO complaint processing program.  29 C.F.R. §1614.102(b), has the Agency Program during the pre-complaint and ages of the EEO process?  quire all managers and supervisors to age in accordance with EEOC (29 C.F.R. Part with emphasis on the federal government's ing mutual resolution of disputes and the	Yes X	et	brief explanation in the space below or complete and attach an EEOC FORM715-01 PART H to
In accordance with established an ADR formal complaint st  Does the Agency rereceive ADR training 1614) regulations, winterest in encourage benefits associated  After the Agency has elected to participate?	resolution process and effective systems for evaluating the impact and effectiveness of the Agency's EEO complaint processing program.  29 C.F.R. §1614.102(b), has the Agency Program during the pre-complaint and ages of the EEO process?  quire all managers and supervisors to age in accordance with EEOC (29 C.F.R. Part with emphasis on the federal government's ing mutual resolution of disputes and the with utilizing ADR?  as offered ADR and the complainant has ee in ADR, are the managers required to	Yes X	et	brief explanation in the space below or complete and attach an EEOC FORM715-01 PART H to

Measures	the impact and effectiveness of its EEO programs.	Yes	No	EEOC FORM 715-01 PART H to the Agency's status report
place to ensure the t	Does the Agency have a system of management controls in place to ensure the timely, accurate, complete, and consistent reporting of EEO complaint data to the EEOC?			
Does the Agency provide reasonable resources for the EEO complaint process to ensure efficient and successful operation in accordance with 29 C.F.R. § 1614.102(a)(1)?		X		
Does the Agency EEO office have management controls in place to monitor and ensure that the data received from Human Resources is accurate, timely received, and contains all the required data elements for submitting annual reports to the EEOC?		X		
Do the Agency's EE enforced by the EEC	O programs address all of the laws	X		
Does the Agency identify and monitor significant trends in complaint processing to determine whether the Agency is meeting its obligations under Title VII and the Rehabilitation Act?		X		
	Does the Agency track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD 715 standards?			See Part H-7
	onsult with other agencies of similar size on their EEO programs to identify best ideas?	X		
Compliance Indicator  The Agency ensures that the investigation and adjudication function of its complaint resolution		Measure has been met		For all unmet measures, provide a brief explanation in the space
Measures	defense arm of Agency or other offices EEOC FORM715-0		below or complete and attach an EEOC FORM715-01 PART H to the Agency's status report	
Are legal sufficiency reviews of EEO matters handled by a functional unit that is separate and apart from the unit which handles Agency representation in EEO complaints?		X		
Does the Agency discrimination complaint process ensure a neutral adjudication function?		X		
If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints?		X		

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		sure been et	For all unmet measures, provide a brief explanation in the space below or complete and attach an	
Measures	EEOC Administrative Judges.	Yes No		EEOC FORM715-01 PART H to the Agency's status report	
ensure that Agency	nave a system of management control to y officials timely comply with any orders or y EEOC Administrative Judges?	X			
Compliance Indicator			sure been et	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the Agency's status report	
Measures	completion.	Yes	No		
	nave control over the payroll processing ency? If Yes, answer the two questions below.		X	Payroll is handled by Defense Finance Accounting Service (DFAS)	
	s in place to guarantee responsive, timely, and occssing of ordered monetary relief?	X			
Are procedure ordered relief	es in place to promptly process other forms of	X			
Compliance Agency personnel are accountable for the timely completion of actions required to comply with orders of EEOC.		Measure has been met		For all unmet measures, provide brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the Agency's status report	
Measures		Yes	No		
	with EEOC orders encompassed in the standards of any Agency employee?	X			
If so, please identify the employees by title in the comments section, and state how performance is measured.		All supervisors and managers have a supervisory performance objective which includes EEO.			
Is the unit charged with the responsibility for compliance with EEOC orders located in the EEO office?		X			
	identify the unit in which it is located, the ployees in the unit, and their grade levels in section.				
Have the involved employees received any formal training in EEO compliance?		X			
Does the Agency promptly provide to the EEOC the following documentation for completing compliance?			-		

Attorney Fees: Copy of check issued for attorney fees and /or a narrative statement by an appropriate Agency official, or Agency payment order dating the dollar amount of attorney fees paid?	X
Awards: A narrative statement by an appropriate Agency official stating the dollar amount and the criteria used to calculate the award?	X
Back Pay and Interest: Computer printouts or payroll documents outlining gross back pay and interest, copy of any checks issued, narrative statement by an appropriate Agency official of total monies paid?	X
Compensatory Damages: The final Agency decision and evidence of payment, if made?	X
Training: Attendance roster at training session(s) or a narrative statement by an appropriate Agency official confirming that specific persons or groups of persons attended training on a date certain?	X
Personnel Actions (e.g., Reinstatement, Promotion, Hiring, Reassignment): Copies of SF-50s	X
Posting of Notice of Violation: Original signed and dated notice reflecting the dates that the notice was posted. A copy of the notice will suffice if the original is not available.	X
Supplemental Investigation: 1. Copy of letter to complainant acknowledging receipt from EEOC of remanded case. 2. Copy of letter to complainant transmitting the Report of Investigation (not the ROI itself unless specified). 3. Copy of request for a hearing (complainant's request or Agency's transmittal letter).	X
Final Agency Decision (FAD): FAD or copy of the complainant's request for a hearing.	X
Restoration of Leave: Print-out or statement identifying the amount of leave restored, if applicable. If not, an explanation or statement.	X
Civil Actions: A complete copy of the civil action complaint demonstrating same issues raised as in compliance matter.	X
Settlement Agreements: Signed and dated agreement with specific dollar amounts, if applicable. Also, appropriate documentation of relief is provided.	x

EEOC FORM 15-01 PART H-2	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
Washington Headquarters Services	For period covering October 1, 2019 to September 30, 2020			
Essential Element D: PROACTIVE PREVENTION Requires that the Agency head makes early efforts to prevent discriminatory actions and eliminate barriers to equal employment opportunity in the workplace.				
STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	N/A			
OBJECTIVE:	To obtain data and conduct trend analysis of the effects of management/personnel policies, procedures, and practices on R/NO/G and disability			
RESPONSIBLE OFFICIAL:	Director, EEOP			
DATE OBJECTIVE INITIATED:	3/10/2015			
TARGET DATE FOR COMPLETION OF OBJECTIVE:	9/30/2017 – <b>Completed</b>			
PLANNED ACTIVITIES TOWARD COMPLETION	TARGET DATE (Must be specific)			
EEOP will contact other Federal agencies to identify best practices for meeting this requirement.	6/30/2015 Completed			
EEOP will identify the policy, procedure, or practice that will be the subject of a trend analysis in FY 2016.	4/30/2016 Completed			
EEOP will discuss with DLA methods of obtaining data on applicants for internal promotions.	6/30/2017 Completed			
As trends are examined, if adverse impacts are revealed, EEOP will discuss options with appropriate officials for revising the applicable policy, procedure, or practice.	9/30/2017 New <b>-Completed and ongoing</b>			

#### REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE

WHS conducted and will continue to conduct a 5-year trend analysis of RGNO data (see Executive Summary, Workforce Analysis). Additionally, for FY 2019, WHS will conduct the 5-year trend for senior grades and disability employment.

EEOC FORM 715-01 PART H-5	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT		
Washington Headquarters Services	For period covering October 1, 2019 to September 30, 2020		
Requires that the Agency's EEO progra	GRATION OF EEO INTO THE AGENCY'S STRATEGIC MISSION ams be organized and structured to maintain a workplace that is free from policies, procedures, or practices and supports the Agency's strategic mission.		
STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	WHS does not have access to sufficient applicant flow data to conduct thorough barrier analysis. WHS does not have sufficient form response rates to monitor and ensure that the data received is accurate, received timely, and contains all the required data elements for submitting annual reports to the WHS.		
OBJECTIVE:	To provide WHS with access to reliable applicant flow data. To provide WHS with accurate data to conduct ongoing barrier analysis and draft the MD 715 report.		
RESPONSIBLE OFFICIAL:	Director, WHS; Director, HRD; Director, EEOP		
DATE OBJECTIVE INITIATED:	3/01/2012		
TARGET DATE FOR COMPLETION OF OBJECTIVE:	6/30/2022		
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)		
Create database to store and track EEO data for applicants.	11/15/2019/Completed.		
Add optional EEO blanks to application form to capture data.	9/30/2019 ongoing		
Start using new application form	10/1/2019 ongoing		
DEPORT OF ACCOMPLICHMENTS and MODIFICATIONS TO ORIECTIVE			

#### REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE

Created a new database to present candidates to offices in November of 2019. Also created new application form for Special Employment Programs in November 2019. Other efforts at the time left too little time remaining before use of the application form needed to go into use. Will make relatively minor adjustments to form as part of other lessons learned. Data from forms will then be able to be entered into databases and tracked along with candidates, themselves.

EEOC FORM 715-01 PART H-6	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT
Washington Headquarters Services	For period covering October 1, 2019 to September 30, 2020

#### **Essential Element E: EFFICIENCY**

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

The Agency does not complete investigations within the prescribed time frame.
To ensure that EEOP has adequate coordination with other entities to achieve timely processing of discrimination complaints.
Director, WHS; Director, EEOP
3/10/2009
9/30/2022
TARGET DATE (Must be specific)
9/30/2013 Ongoing
6/30/2015 Completed and ongoing
9/30/2015 Completed and ongoing
2/2015 Completed and ongoing

#### REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE

In FY20, complaints processing time decreased by 9 percent as compared to FY18 from 196 days to 179 days.

On average, WHS processed eleven FADs on the merit per year between FY 2018 and FY 2020, ranging from ten in FY 2019 to 13 in FY 2020. WHS' average processing time to complete a FAD is: 46 days for FY 2018; 58 days for FY 2019; and 42 days for FY 2020. The plan for FY20 and going forward, to ensure compliance with the FAD timeline requirements, will continue with two dedicated staff members, one being the Director, as FAD writers as competencies improve with experience.

# EEOC FORM 715-01 PART H-7 Washington Headquarters Services U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT For period covering October 1, 2019 to September 30, 2020

#### **Essential Element E: EFFICIENCY**

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

STATEMENT of MODEL PROGRAM ESSENTIAL	WHS does not track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD 715 standards.			
OBJECTIVE:	To obtain data on recruitment efforts to identify potential barriers.			
RESPONSIBLE OFFICIAL:	Director, WHS; Director, HRD; Director, EEOP			
DATE OBJECTIVE INITIATED:	3/01/2012			
TARGET DATE FOR COMPLETION OF OBJECTIVE:	9/30/2019 New date: 6/30/2017			
PLANNED ACTIVITIES TOWARD COMPLETION	TARGET DATE (Must be specific)			
Create database to store and track EEO data for applicants.	11/15/2019 - Completed.			
Add optional EEO blanks to application form to capture data.	9/30/2019 ongoing			
Start using new application form	10/1/2019			
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE				

Created a new database to present candidates to offices in November of 2019. Also created new application form for Special Employment Programs in November 2019. Other efforts at the time left too little time remaining before use of the application form needed to go into use. Will make relatively minor adjustments to form as part of other lessons learned. Data from forms will then be able to be entered into databases and tracked along with candidates, themselves.

EEOC FORM	U.S. Equal Employment Opportur	
715-01 PART I – 1	FEDERAL AGENCY ANNUAL EEO PROC EEO Plan to Attain the Essential Elements	
Washington Headquarters Services	For period covering October 1, 2019 to	o September 30, 2020
PEOPLE WITH TARGETED DISAB	ILITIES (PWTD) WORKFORCE	
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?	WHS workforce data (Table B1) indicates that employees with targeted disabilities is still belo Table B8 (New Hires) shows that WHS and ser met the 2% hiring goal.	w the 2% on-board goal.
BARRIER ANALYSIS: Provide a description of the steps taken and data analyzed to determine cause of the condition.	Due to the lack of applicant flow data, it could barriers exist. WHS did receive 200 Schedule these candidates were qualified is not known.	
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the Agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Applicant data showing disability status was no not have a targeted recruitment plan.	t available. WHS does
<b>OBJECTIVE:</b> State the alternative or revised Agency policy, procedure or practice to be implemented to correct the undesired condition.	Recruitment efforts directed at this group will be Director will continue to stress hiring to meet the WHS will so analyze applicant flow data in 202	ne goal.
RESPONSIBLE OFFICIAL:	Director, WHS; Director, HRD; Director, EEOI	
DATE OBJECTIVE INITIATED:	3/09/2009	
TARGET DATE FOR COMPLETION OF	Ongoing	
PLANNED ACTIVITIES TOWARD	COMPLETION OF OBJECTIVE	TARGET DATE (Must be specific)
Utilize DefenseReady as a mechanism to track information on Agency vacancies, to include recruitment as available.		9/30/2019 – New date 6/30/2019
Implement the recruitment plan and monitor results via hiring activity.		Completed and ongoing
If necessary, revise the recruitment plan.		Completed and ongoing
Continue to train hiring officials on the return the 2% goal for people with targeted disa	equirement to hire people with disabilities and bilities.	Completed and ongoing

Publicize WHS Directorates and Serviced Components that met the goal.	Completed and ongoing
Conduct recruitment at the Disability Services Offices at local colleges and universities.	Completed and ongoing
Attend local job fairs for people with disabilities.	Completed and ongoing
Coordinate with the Public Affairs communication team to implement social media recruitment through social media platforms such as: LinkedIn, Facebook, Twitter, and hrough the DoD Blog. Posted content to include job fairs, new position opportunities, appropriate events, and more relating to the Diversity, Disability and Recruitment program with a goal to reach broader audience of highly desired candidates, inclusive of veterans/disabled veterans, to fill the crucial positions in IT, security, and cybersecurity.	Completed and ongoing
Utilize newly hired Customer Account Managers (CAMS) to support customers within he serviced population, to include key strategic analyses as well as human capital equirements.	Completed and ongoing
FY 2020, the Agency hired 43 employees (6.66%) who reported having a disability and ported having a targeted disability. PWTD comprise 1.49% of the workforce of WHS armployees with reportable disabilities are now 9.22% of the total workforce, compared to	d Serviced Components.
FY 2020, the Agency hired 43 employees (6.66%) who reported having a disability and ported having a targeted disability. PWTD comprise 1.49% of the workforce of WHS are	d Serviced Components.
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EEOC FORM 715-01 PART I – 2	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT EEO Plan to Attain the Essential Elements of a Model EEO Program			
Washington Headquarters Services	For period covering October 1, 2019 to September 30, 2020			
HISPANIC WORKFORCE				
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?	Total workforce:  • Hispanic males – 3.33% versus NCLF of 5.17% • Hispanic females – 1.55% versus NCLF of 4.79%  *Upward mobility analysis* The following groups had a lower representation rate at the higher pay level as compared to the pay distribution of the total workforce:  • Hispanic males at GS-14 and above • Hispanic females progressed to GS-13 before registering a decrease in representation at the SES level.  *Major occupations (Table A6, Permanent)* Hispanics were well underrepresented in all major occupations with the exception of males being overrepresented in the 0083 series.  *New Hires (Table A1)* A total of 1 Hispanics were hired at a rate of 3.57%. Both males and females were hired at rates lower than their presence in the NCLF.  *Separations (Table A14)* 9 females (1.38%) and 10 males (1.54%) were separated. There was 1 (0.15%) involuntary separation. Voluntary separations were well below NCLF representation.			
BARRIER ANALYSIS:  Provide a description of the steps taken and data analyzed to determine cause of the condition.	WHS identified these triggers by analyzing various MD-715 data tables (A1, A4-1, A6, A8, A-9, A-10A-12, & A14). Hispanic males and females are not hired at rates matching their availability in the NCLF. They are also below the occupational CLF in several job series.			
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the Agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	While WHS does conduct targeted recruitment, it has not resulted in a higher percentage of applications from Hispanic males and females so that the applicant rate is closer to their ratio in the NCLF.			
OBJECTIVE:  State the alternative or revised Agency policy, procedure or practice to be implemented to correct the undesired condition.	Recruitment efforts will continue to target qualified Hispanic men and women.			

RESPONSIBLE OFFICIAL:	Director, HRD; Director, EEOP	
DATE OBJECTIVE INITIATED:	3/10/2009	
TARGET DATE FOR COMPLETION OF	9/30/2020	

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE	TARGET DATE (Must be specific)
Implement the recruitment plan and monitor results via applicant flow data.	Completed and ongoing
Utilize DefenseReady as a mechanism to track information on Agency vacancies, to include recruitment as available.	9/30/2020
Continue to analyze the separation data.	ongoing
Analyze separation data to evaluate and explore the correlation between length of service and separation.	9/30/2020
Obtain Nature of Action Codes for separations and review to determine why Hispanics are leaving the Agency.	Completed and ongoing

#### REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE

HRD provides periodic updates to leadership and the workforce on the recruitment and employment of Hispanics/Latinos. Also, consistent with the WHS Targeted Recruitment Plan, HRD provides feedback about current office operations with the goal of determining alternative methods to increase the success of the office's programs. The Plan is based on participation and efforts of WHS leadership, directorates, offices, and the HRD Recruitment and Outreach specialists. HRD requested that each office assign a representative to partner with the recruitment and outreach specialists. In 2016, HRD established Customer Account Managers (CAMS) to serve as liaisons between HRD and the customer. The CAMS:

- •provide feedback to HRD about operations of their assigned customers
- •assist customers with determining alternative methods to increase the success of the office's programs through utilization of special appointment authorities (e.g., Student Education Employment Program, Temporary Summer Hire Authority, Presidential Management Intern (PMI) authority).
- •partner with customers and DDR on opportunities for recruitment and advancement of employees with targeted disabilities, to include Hispanic/Latinos; and
- •assist customers with developing customer-specific, office-specific, and occupation-specific hiring from the Hispanic/Latino community.

EEOC FORM 715-01 PART I – 4	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT EEO Plan to Attain the Essential Elements of a Model EEO Program			
Washington Headquarters Services	vices For period covering October 1, 2019 to September 30, 2020			
FEMALES IN THE WORKFORCE				
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?	WHS permanent workforce data (Table A1) reflects a low representation rate for females (32.68%) compared to their availability in the NCLF (48.1%). Specifically, White females (18.58%) are below the NCLF (34.03%).			
BARRIER ANALYSIS:  Provide a description of the steps taken and data analyzed to determine cause of the condition.	WHS identified this trigger by analyzing various MD-715 data tables (A1, A4, A8, A12, & A14). Females are not hired at rates matching their availability in the NCLF. They are also below the occupational CLF in several job series.  Applicant flow data was obtained and analyzed. During FY 2020, WHS received an insufficient number of applications from females. Their ratio as a percentage of total applicants was lower than their ratio in the NCLF.			
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the Agency policy, procedure, or practice that has been determined to be the barrier of the undesired condition.	While WHS does conduct targeted recruitment, it has not resulted in a higher percentage of applications from Females so that the applicant rate is closer to their ratio in the NCLF.			
OBJECTIVE: State the alternative or revised Agency policy, procedure, or practice to be implemented to correct the undesired condition.  Recruitment efforts will target qualified Females. WHS will also attempted to obtain more information on the reasons for separations.				
RESPONSIBLE OFFICIAL:	Director, HRD; Director, EEOP			
DATE OBJECTIVE INITIATED:	TE 3/10/2009; 10/1/2015			
TARGET DATE FOR COMPLETION OF New date: 9/30/22				
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE  TARGET DATE (Must be specific				
Implement the recruitment plan and monitor results via applicant flow data.  Completed and ong				
Establish a mechanism to track and present to senior management information on vacancies, to include source of recruitment and diversity of applicants as available.  9/30/2016 and ongoing				

Explore ways to improve the number of separating employees who complete the exit survey.

6/2015 New date: 9/30/20

#### REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE

A comprehensive recruitment plan consists of strategies targeted for hiring of Females. Part of the strategy will be to establish a rapport and partnerships with Women's and Veterans' organizations/associations, networking events as well as identify methods to attract, train and retain Females to the Agency. WHS anticipates hosting a seminar in conjunction with OPM to explore pathways for women to attain senior executive status and employment.

<u></u>				
EEOC FORM 715-01 PART I - 4	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT EEO Plan to Attain the Essential Elements of a Model EEO Program			
Washington Headquarters Services	For period covering October 1, 2019 to September 30, 2020			
GS 13 AND ABOVE WORKFORCE				
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?	In FY 2020, the following groups had a lower representation rate at the higher pay levels as compared to the NCLF:  • Hispanic males at GS-14 and above  • Hispanic females at SES  • African American males at GS-14 and above  • African American females at GS-15 and above  • Asian females at GS-15  • Employees with targeted disabilities at GS-15 and above			
BARRIER ANALYSIS:  Provide a description of the steps taken and data analyzed to determine cause of the condition.	The Table A4-2 was analyzed. Each group's participation rate in each pay level was compared to the ratio of the total workforce in that pay level. The above discrepancies were noted.			
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the Agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	There is a need to compile relevant data and perform detailed analysis on potential barriers from the GS 13 to SES (e.g., internal selection data and applicant flow data).			
OBJECTIVE: State the alternative or revised Agency policy, procedure or practice to be implemented to correct the undesired condition.	WHS will continue to examine workforce data and collect feedback from employees. The impact of hiring Veterans will also be examined.			

RESPONSIBLE OFFICIAL:	Director, HRD; Director EEOP	
DATE OBJECTIVE INITIATED:	3/09/2009	
TARGET DATE FOR COMPLETION OF	9/30/20	

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE	TARGET DATE (Must be specific)
Establish Special Retention Programs (SRPs)	9/30/2020
Align Special Retention Programs (SRPs) with WHS and Supported Organization Goals	12/31/2020
Maintain and Reinvigorate Special Retention Programs Over Time	ongoing

#### REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE

Similar to how Special Employment Programs incentivize potential new talent to join WHS-supported organizations, Special Retention Programs can incentivize existing talent to remain. WHS efforts along these lines improve overall diversity efforts, though for the purpose of this recruiting strategy, efforts ensure a more robust internal source of candidates to recruit for openings. Efforts to create these programs will begin in the late summer of 2019, targeting groups with lower retention and representation at higher ranks.

EEOC FORM 715-01 PART J	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities
Washington	For period covering October 1, 2019 to September 30, 2020

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 614.203(e)) and MD-715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

#### Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 C.F.R. § 1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with reportable and targeted disabilities in the federal government.

1. Using the goal of 12% as the benchmark, does your Agency have a trigger involving <u>PWD</u> by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

a.	Cluster GS-1 to GS-10 (PWD)	Yes	No X
b.	Cluster GS-11 to SES (PWD)	Yes X	No

The percentage of PWD in the GS-11 to SES cluster was 12.79% in FY 2020, which falls above the goal of 12%.

2. Using the goal of 2% as the benchmark, does your Agency have a trigger involving <u>PWTD</u> by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

a.	Cluster GS-1 to GS-10 (PWTD)	Yes	No X
b.	Cluster GS-11 to SES (PWTD)	Yes	No X

n/a

3. Describe how the Agency has communicated the numerical goals to the hiring managers and/or recruiters.

WHS utilized a variety of methods to include Training (HR & Leadership for New Supervisors; annual EEO and Diversity Training); quarterly newsletter, quarterly Leadership meetings, and the annual policy.

#### **Section II: Model Disability Program**

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the Agency has in place.

- A. Plan to Provide Sufficient & Competent Staffing for the Disability Program
  - 1. Has the Agency designated sufficient qualified personnel to implement its disability program during the reporting period? If "no", describe the Agency's plan to improve the staffing for the upcoming year.

Yes X No

n/a
-----

2. Identify all staff responsible for implementing the Agency's disability employment program by the office, staff employment status, and responsible official.

	# of FTE Staff by		Staff by	
Disability Program	Employment Status		nt Status	Responsible Official
Task	Full Part Collateral		Collateral	(Name, Title, Office, Email)
	Time	Time	Duty	
Processing	2		2	ST Pettiford, HR Specialist
applications from				(Disability Recruitment)
PWD and PWTD				s.t.pettiford.civ@mail.mil
Answering questions	3		3	ST Pettiford, HR Specialist
from the public about				(Disability Recruitment)
hiring authorities that				s.t.pettiford.civ@mail.mi
take disability into				
account				

Processing reasonable	2	2	Dr. Edna Johnson, Disability
accommodation			and Reasonable
requests from			Accommodations Program
applicants and			Manager,
employees			Edna.e.johnson.civ@mail.mil
Section 508	1	4	Theresa Gary, Section 508
Compliance			Coordinator
			Theresa.b.gary2.civ@mail.mil
Architectural Barriers	3		Ariam Kloehn, Facility
Act Compliance			Accessibility Program
			Manager
			WHS.Accessibility@mail.mil
Special Emphasis	3	3	ST Pettiford, HR Specialist
Program for PWD and			(Disability Recruitment)
PWTD			s.t.pettiford.civ@mail.mil

3. Has the Agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If "yes," describe the training that disability program staff have received. If "no," describe the training planned for the upcoming year.

Yes X No

Disability Program Manager (EEOC), ADA, and RA Training (NELI)

- B. Plan to Ensure Sufficient Funding for the Disability Program
  - 1. Has the Agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If "no," describe the Agency's plan to ensure all aspects of the disability program have sufficient funding and other resources.

Yes X No

n/a			

#### Section III: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. § 1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the Agency's recruitment program plan for PWD and PWTD.

#### A. Plan to Identify Job Applicants with Disabilities

- 1. Describe the programs and resources the Agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.
- In FY 2020, the Agency hired 43 employees (6.66%) who reported having a disability and 11 employees (1.70%) who reported having a targeted disability. PWTD comprise 1.49% of the workforce of WHS and Serviced Components. Employees with reportable disabilities are now 9.22% of the total workforce, compared to 8.79% at the end of FY 2019.
- WHS continues to work closely with Gallaudet University and other major local universities and disability interest institutions in the National Capital Region.
- WHS attends prioritized events focused on disabled veterans, individuals with targeted disabilities including the Hiring our Heroes career event.
  - 2. Pursuant to 29 C.F.R. § 1614.203(a)(3), describe the Agency's use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce.
- Inclusion of a specific statement in vacancy announcements related to Special Appointing Authorities, to include veterans with a disability rating of 30% or more, with links to informative webpages that further explain and clarify those appointment types. (See Attachment B)
- Continue utilization of special hiring authorities and job development programs for veterans, to include veterans with a disability rating of 30% or more. To this end, HRD will continue to educate hiring managers on the use of special appointing authority for 30% or more disabled veterans.
   Additionally, WHS will seek to include veteran employees with disabilities as recruitment and outreach consultants.
- Continued utilization of OPM shared (Bender) list to place individuals with reportable and targeted disabilities.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the Agency (1) determines if the individual is eligible for appointment under such authority and (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

WHS created searchable applicant database that can be used for Disabled Veterans, Pathways Interns, and recent graduates. Applicants must submit all supporting documentation to Special Employment Program (SEP) employees, who verify eligibility before adding applicants to the WHS database. Efforts to improve use of the database is ongoing.

4. Has the Agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the Agency's plan to provide this training.

Yes X No N/A

WHS utilized a variety of methods to include Training (HR & Leadership for New Supervisors; annual EEO and Diversity Training); quarterly newsletter, quarterly Leadership meetings, and the annual policy.

- B. Plan to Establish Contacts with Disability Employment Organizations
  - 1. Describe the Agency's efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

Special Employment Program employees maintain current relationships with vocational rehabilitation offices, state employment offices, veterans' organizations, colleges/universities and other facilities to obtain applications from disabled veterans. They participate in a DoD department-wide recruiter's consortium to share ideas and information to improve recruitment efforts.

- C. Progression Towards Goals (Recruitment and Hiring)
  - 1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If "yes," please describe the triggers below.
    - a. New Hires for Permanent Workforce (PWD) Yes X No
    - b. New Hires for Permanent Workforce (PWTD) Yes X No

In FY 2020, the Agency hired 43 employees (6.66%) who reported having a disability and 11 employees (1.70%) who reported having a targeted disability. PWTD comprise 1.49% of the workforce of WHS and Serviced Components. Employees with reportable disabilities are now 9.22% of the total workforce, compared to 8.79% at the end of FY 2019. This falls below the respective benchmark of 12% for PWD and 2% for PWTD.

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If "yes," please describe the triggers below.

a.	New Hires for MCO (PWD)	Yes	No
b.	New Hires for MCO (PWTD)	Yes	No

<sup>\*</sup>WHS was unable to obtain applicant flow data to perform this analysis.

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified *internal* applicants for any of the mission-critical occupations (MCO)? If "yes," please describe the triggers below.

a.	Qualified Applicants for MCO (PWD)	Yes	No
b.	Qualified Applicants for MCO (PWTD)	Yes	No

<sup>\*</sup>WHS was unable to obtain applicant flow data to perform this analysis.

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If "yes," please describe the triggers below.

a. Promotions for MCO (PWD)b. Promotions for MCO (PWTD)YesNo

## Section IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R § 1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

- A. Advancement Program Plan
  - 1. Describe the Agency's plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

The SEP employees endeavor to place PWD/PWTD employees in a billet that has promotion potential, when possible. Managers are encouraged to provide PWD/PWTD employees training for promotion to the next higher grade. DDR works with the Section 508 coordinator to ensure that PWD/PWTD employees are provided appropriate accessible technology to enable them to perform the essential functions of their jobs, as well as participate in training and development opportunities.

B. Career Development Opportunities

<sup>\*</sup>WHS was unable to obtain applicant flow data to perform this analysis.

## 1. Please describe the career development opportunities that the Agency provides to its employees.

WHS has a standard training budget to allow employees to explore opportunities within or to stretch outside their functional area. Additionally, over 4,000 online courses are available through iCompass. Detail opportunities are encouraged. WHS also offers competitive Leader Development Programs, to include assessment tools, leadership development workshops (Leading at the Speed of Trust), assessment tools (Myers Briggs, StrengthsFinder, Benchmarks 360 surveys), executive coaching, and competitive leader development programs. These include Executive Leadership Development Program, White House Leadership Program, WHS Aspiring Leader Program, and the Key Executive Leadership Certificate Program, to name a few. WHS informs employees of OPM negotiated tuition reduction partnerships with post-secondary institutions.

# 2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate.

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selecte es (%)
Internship Programs	n/a	n/a	n/a	n/a	n/a	n/a
Fellowship Programs	3	2	0	0	0	0
Mentoring Programs	n/a	n/a	n/a	n/a	n/a	n/a
Coaching Programs	n/a	n/a	n/a	n/a	n/a	n/a
Training Programs	n/a	n/a	n/a	n/a	n/a	n/a
Detail Programs –  **no formal detail  program	n/a	n/a	n/a	n/a	n/a	n/a
Other Career Development Programs	135	55	8	6	0	0

3.	Do triggers exist for <u>PWD</u> among of the career development progra are the relevant applicant pool for selectees.) If "yes," describe to	ams? (The appropror the applicants and	iate benchmarks I the applicant pool
	a. Applicants (PWD)	Yes X	No
	h Selections (PWD)	Ves	No

In FY 2020, triggers exist for PWD in all career development programs except at the GS-15 and SES levels.

4. Do triggers exist for <u>PWTD</u> among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If "yes," describe the trigger(s) in the text box.

a.	Applicants (PWTD)	Yes	No
b.	Selections (PWTD)	Yes	No

In FY 2020, triggers exist for PWTD in all career development programs.

#### C. Awards

1. Using the inclusion rate as the benchmark, does your Agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If "yes," please describe the trigger(s) in the text box.

a.	Awards, Bonuses, & Incentives (PWD)	Yes X	No
b.	Awards, Bonuses, & Incentives (PWTD)	Yes X	No

In FY 2020, triggers exist for all PWD and PWTD employee recognition and awards, except PWD in the category of Cash Awards: \$100 - \$500.

2.	Using the inclusion rate as the benchmark, does your Agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If "yes," please describe the trigger(s) in the text box.				
		ay Increases (PWD)  ay Increases (PWTD)  Yes	<b>S X</b>	No No X	,
comp		igger exists for PWD who receive a queverall inclusion rate of PWD to the rate eases.			
3.	PWD and without d	ency has other types of employee rec d/or PWTD recognized disproportion lisabilities? (The appropriate bench describe the employee recognition pr t box.	nately less mark is t	s than e he inclu	employees ision rate.)
		Other Types of Recognition (PWD) Other Types of Recognition (PWTD)	Yes Yes	No No	N/A X N/A X
n/a					
D.	Promotion	ns			
1.	internal a levels? (T for qualif selectees.	r Agency have a trigger involving <u>PV</u> applicants and/or selectees for promo Γhe appropriate benchmarks are the fied internal applicants and the quali ) For non-GS pay plans, please use t els. If "yes," describe the trigger(s) i	tions to t relevant fied appl the appro	he senicapplication icant position i	or grade ant pool ool for
	a. SI		WD) Was		NI.
		<ul><li>i. Qualified Internal Applicants (PV</li><li>ii. Internal Selections (PWD)</li></ul>	VD) Yes Yes		No No
	b. Gı	rade GS-15	1 68		INU
	J. GI	i. Qualified Internal Applicants (PV	VD) Yes		No
		ii. Internal Selections (PWD)	Yes		No

c. Grade GS-14

i. Qualified Internal Applicants (PWD) Yes No
ii. Internal Selections (PWD) Yes No
d. Grade GS-13

i. Qualified Internal Applicants (PWD) Yes No
ii. Internal Selections (PWD) Yes No

\*WHS was unable to obtain applicant flow data to perform this analysis.

- 2. Does your Agency have a trigger involving <u>PWTD</u> among the qualified *internal* applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes," describe the trigger(s) in the text box.
  - a. SES i. Qualified Internal Applicants (PWTD) Yes No ii. Internal Selections (PWTD) Yes No b. Grade GS-15 i. Qualified Internal Applicants (PWTD) Yes No ii. Internal Selections (PWTD) Yes No c. Grade GS-14 i. Qualified Internal Applicants (PWTD) Yes No ii. Internal Selections (PWTD) Yes No d. Grade GS-13 i. Qualified Internal Applicants (PWTD) Yes No

Yes

No

\*WHS was unable to obtain applicant flow data to perform this analysis.

ii. Internal Selections (PWTD)

3. Using the qualified applicant pool as the benchmark, does your Agency have a trigger involving <u>PWD</u> among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes," describe the trigger(s) in the text box.

a.	New Hires to SES (P	WD)	Yes	No
b.	New Hires to GS-15	(PWD)	Yes	No
c.	New Hires to GS-14	(PWD)	Yes	No
d.	New Hires to GS-13	(PWD)	Yes	No

\*WHS was unable to obtain applicant flow data to perform this analysis.

4. Using the qualified applicant pool as the benchmark, does your Agency have a trigger involving <u>PWTD</u> among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes," describe the trigger(s) in the text box.

a	New Hires to SES (PWTD)	Yes	No
b.	New Hires to GS-15 (PWTD)	Yes	No
c.	New Hires to GS-14 (PWTD)	Yes	No
d.	New Hires to GS-13 (PWTD)	Yes	No

\*WHS was unable to obtain applicant flow data to perform this analysis

5. Does your Agency have a trigger involving <u>PWD</u> among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes," describe the trigger(s) in the text box.

a.	Execu	tives		
	i.	Qualified Internal Applicants (PWD)	Yes	No
	ii.	Internal Selections (PWD)	Yes	No
b.	Manag	gers		
	i.	Qualified Internal Applicants (PWD)	Yes	No
	ii.	Internal Selections (PWD)	Yes	No
c.	Superv	visors		
	i.	Qualified Internal Applicants (PWD)	Yes	No
	ii.	Internal Selections (PWD)	Yes	No

<sup>\*</sup>WHS was unable to obtain applicant flow data to perform this analysis.

6. Does your Agency have a trigger involving <u>PWTD</u> among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes," describe the trigger(s) in the text box.

a.	Executives			
	i. Qualified Internal Applicants (PWTD)	Yes	No	
	ii. Internal Selections (PWTD)	Yes	No	
b.	Managers			
	i. Qualified Internal Applicants (PWTD)	Yes	No	
	ii. Internal Selections (PWTD)	Yes	No	
c.	Supervisors			

i. Qualified Internal Applicants (PWTD)ii. Internal Selections (PWTD)Yes NoNo

\*WHS was unable to obtain applicant flow data to perform this analysis.

7. Using the qualified applicant pool as the benchmark, does your Agency have a trigger involving <u>PWD</u> among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.

a.	New Hires for Executives (PWD)	Yes	No
b.	New Hires for Managers (PWD)	Yes	No
c.	New Hires for Supervisors (PWD)	Yes	No

\*WHS was unable to obtain applicant flow data to perform this analysis.

8. Using the qualified applicant pool as the benchmark, does your Agency have a trigger involving <u>PWTD</u> among the selectees for new hires to supervisory positions? If "yes," describe the trigger(s) in the text box.

a.	New Hires for Executives (PWTD)	Yes	No
b.	New Hires for Managers (PWTD)	Yes	No
c.	New Hires for Supervisors (PWTD)	Yes	No

\*WHS was unable to obtain applicant flow data to perform this analysis.

#### Section V: Plan to Improve Retention of Persons with Disabilities

To be a model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace personal assistance services.

#### A. Voluntary and Involuntary Separations

1. In this reporting period, did the Agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If "no," please explain why the Agency did not convert all eligible Schedule A employees.

No

N/A

n/a		

Yes X

	a. Voluntary Separations (PWD)	Yes	No X
	b. Involuntary Separations (PWD)	Yes	No X
n/a			
3.	Using the inclusion rate as the benchm among voluntary and involuntary sepa without targeted disabilities? If "yes",	rations exceed that	of persons
	a. Voluntary Separations (PWTD)	Yes	No X
	b. Involuntary Separations (PWTD)	Yes	No X
n/a			
4.	If a trigger exists involving the separate please explain why they left the Agency other data sources.		
n/a			
3. Ac	cessibility of Technology and Facilities		
pplica	ant to 29 C.F.R. § 1614.203(d)(4), federal and and employees of their rights under Solution (29 U.S.C. § 794(b), concerning the access Architectural Barriers Act of 1968 (42 U.S.C.)	ection 508 of the Rehessibility of Agency t	abilitation A echnology,

individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the Agency's public website for its notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

For information about Section 508:

http://dodcio.defense.gov/DODSection508.aspx. Complaints should be addressed to the DoD Office of Diversity, Equity, and Inclusion (ODEI) - http://diversity.defense.gov.

2. Please provide the internet address on the Agency's public website for its notice explaining employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

For questions or concerns about architectural barriers, individuals may visit https://my.whs.mil/services/accessibility. WHS does not have an internet address specific to rights under the Architectural Barriers Act, but complaints must be addressed to the DoD Office of Diversity , Equity, and Inclusion (ODEI). https://my.whs.mil/services/accessibility

3. Describe any programs, policies, or practices that the Agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of Agency facilities and/or technology.

N/A		

C. Reasonable Accommodation Program

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

The average processing time for accommodation requests in FY 2020 was 10 days. The process has been enhanced by regular training of employees and supervisors. Further, the RAPM, her assistant, and the Team Lead are fully available to advise managers before and during the RA process.

2. Describe the effectiveness of the policies, procedures, or practices to implement the Agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

WHS timely processes RA requests and timely approves accommodations. RA training for managers and supervisors is an integral part of the following training: HR and Leadership for New Employee, and EEO and Diversity for Supervisors. The RAPM regularly monitors accommodation requests and advises leadership of any trends.

#### D. Personal Assistance Services

Allowing Employees to Participate in the Workplace Pursuant to 29 C.F.R. § 1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the Agency.

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends. PAS follow the normal RA process but will require a few additional details in the RA request form.

Requests may be submitted in writing or orally to an employee's supervisor; another supervisor or manager in the employee's chain of command; the Director, EEO Office; or the AD, DDR. When such requests require review or consultation, the receiving individual will ensure that such requests are forwarded to the RAPM within 7 calendar days of receipt. Employees may also submit the SD Form 827, "Confirmation of Request for Reasonable Accommodation form to the RAPM

PAS documentation should include:

- Identification of the specific nature, severity, and duration of the impairment.
- A description of which activities of daily living, such as removing and putting on clothing, eating, toileting, maneuvering, orienting, reaching and grabbing items out of reach, traveling, and other related needs, are made difficult as a result of the identified impairment or treatment, including medication.
- Identification and explanation of how the requested personal assistance services will assist the employee who cannot enjoy the opportunities or benefits of employment without personal assistance services

#### Section VI: EEO Complaint and Findings Data

Yes X

settlement agreement?

<ul> <li>A. EEO Complaint data involving Ha</li> </ul>	arassmen	ιt
--	----------	----

1.	During the last fiscal year, did a higher percentage of PWD file a formal
	EEO complaint alleging harassment, as compared to the government-
	wide average?

N/A

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a

No

	Yes	No X	N/A
n/a			

t fiscal yo	ear, did a h g failure to	igher <sub>l</sub>	ecommodatio		
nt allegin	g failure to	_	percentage o	f DWD file a for	
•	npared to tl	_	de a reasonal ernment-wic	ble	ma
Yes	No		N/A X		
nable acc	ommodatio	_	_	_	tion
_	No	X	N/A	A	
ide a rea	sonable acc	commo	dation durii	ng the last fiscal	
	nable acc t agreem Yes had one o	t fiscal year, did any nable accommodation t agreement? Yes No had one or more fine vide a reasonable acc	t fiscal year, did any comp nable accommodation resu t agreement? Yes No X had one or more findings of tide a reasonable accommo	t fiscal year, did any complaints alleginable accommodation result in a finding agreement?  Yes No X N/A  had one or more findings of discrimination accommodation duri	t fiscal year, did any complaints alleging failure to nable accommodation result in a finding of discriminat tagreement?

Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.

1. Has the Agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Yes No X N/A

2.	Has the Agency established a plan to correct the barrier(s) involving
	PWD and/or PWTD?

Yes No X N/A

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments.

Barrier(s)  Objective(s)  Responsible Official(s)  Barrier Analysis Process Completed? (Yes or No)  Sources  Reviewed? (Yes or No)  Workforce Data Tables  Complaint Data (Trends) Grievance Data (Trends) Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes) Climate Assessment Survey (e.g., FEVS) Exit Interview Data Focus Groups Interviews Reports (e.g., Congress, EEOC, MSPB, GAO, OPM) Other (Please Describe)	Trigger 1			
Responsible Official(s)  Responsible Official(s)  Barrier Analysis Process Completed? (Yes or No)  Sources Reviewed? (Yes or No)  Workforce Data Tables  Complaint Data (Trends)  Grievance Data (Trends)  Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)  Climate Assessment Survey (e.g., FEVS)  Exit Interview Data  Focus Groups  Interviews  Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)  Performance Standards Address the Plan? (Yes or No)  Barrier(s) Identified? (Yes or No)  Identify Information Collected  (Yes or No)  Enterview Identify Information Collected  (Yes or No)  Exit Interview Data  Focus Groups  Interviews  Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Barrier(s)			
Responsible Official(s)  Barrier Analysis Process Completed? (Yes or No)  Sources Reviewed? (Yes or No)  Workforce Data Tables  Complaint Data (Trends) Grievance Data (Trends) Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes) Climate Assessment Survey (e.g., FEVS)  Exit Interview Data Focus Groups Interviews Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	-			
Sources of Data  Sources Reviewed? (Yes or No)  Workforce Data Tables  Complaint Data (Trends)  Grievance Data (Trends)  Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)  Climate Assessment Survey (e.g., FEVS)  Exit Interview Data  Focus Groups  Interviews  Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Responsible Official(s)			Plan?
Sources of Data Reviewed? (Yes or No)  Workforce Data Tables  Complaint Data (Trends)  Grievance Data (Trends)  Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)  Climate Assessment Survey (e.g., FEVS)  Exit Interview Data  Focus Groups  Interviews  Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Barrier	· ·	mpleted?	` '
Complaint Data (Trends)  Grievance Data (Trends)  Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti- Harassment Processes)  Climate Assessment Survey (e.g., FEVS)  Exit Interview Data  Focus Groups  Interviews  Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Sou	rces of Data	Reviewed?	Identify Information Collected
Grievance Data (Trends)  Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti- Harassment Processes)  Climate Assessment Survey (e.g., FEVS)  Exit Interview Data  Focus Groups  Interviews  Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Workforce Data Tables			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti- Harassment Processes)  Climate Assessment Survey (e.g., FEVS)  Exit Interview Data  Focus Groups  Interviews  Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Complaint Data (Trends)			
EEO, Grievance, MSPB, Anti- Harassment Processes)  Climate Assessment Survey (e.g., FEVS)  Exit Interview Data  Focus Groups  Interviews  Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Grievance Data (Trends)			
FEVS) Exit Interview Data Focus Groups Interviews Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	EEO, Grievance, MSPB, Anti-			
Focus Groups Interviews Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)		essment Survey (e.g.,		
Interviews Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Exit Interview	w Data		
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Focus Groups	S		
MSPB, GAO, OPM)	Interviews			
Other (Please Describe)		•		
	Other (Please	e Describe)		

Date (mm/dd/yyy y)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyy y)	Completi on Date (mm/dd/y yyy)
Fiscal Year	Acc	omplishments		
4.	Please explain the factor(s) that p	_	gency from time	ely
n/a	completing any of the planned ac	tivities.		
	For the planned activities that we actual impact of those activities to	re completed, p		

EEOC FORM 715-02 PART A - D				FEDERAL	nent Opportunity Comn AGENCY ANNUAL AM STATUS REPOR			
DOD Office of	f the Secretary	/Washington H	eadquarters Services		For period covering C	October	1, 2019	to September 30, 2020
PART A Department or Agency	1. Agenc	y		1. DOD C	Office of the Secretary/W	Vashingt	on Head	quarters Services
Identifying Information	<b>1.a</b> 2nd le	vel reporting con	nponent					
	2. Addre	ss		<b>2.</b> 1155 D	efense Pentagon			
	3. City, S	State, Zip Code		3. Washin	gton, DC 22311			
	4. Agency	Code 5.	FIPS code(s)	<b>4.</b> DD21		5.	3840	
PART B Total Employment	1. Enter t	otal number of p	ermanent full-time and pa	art-time emplo	pyees		<b>1</b> . 45	82
	2. Enter t	otal number of te	emporary employees				<b>2.</b> 91	9
	3. ТОТА	L EMPLOYMI	ENT [add lines B 1 throu	ugh 2]			<b>4.</b> 55	501
PART	C		Title Type		Name	:		Title
Agency Official(s	) Responsible	Head of Agenc	у		Thomas M. Muir			Director, WHS
For Oversigh	t of EEO	Principal EEO	Director/Official		Pamela R. Sullivan			EEOP Director
Progran	n(s)		nployment Program Mana		Kevin Driscoll			Assistant Director, DDR, HRD
		Complaint Prod	cessing Program Manager		Patrick Anderson			Program and Complaints Manager, EEOP
		Other EEO Sta	ff		Pamela R. Sullivan			Director, Office of Equal Employment Opportunity Programs

EEOC FORM 715-02 PART A - D

#### U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

For period covering October 1, 2019 to September 30, 2020

	F		
PART D List of Subordinate Components Covered in This Report	Subordinate Component and Location (City/State)	Country	Agency Code
	DOD Office of the Secretary/Washington Headquarters Services Arlington, VA	United States	DD01
	DOD Office of the Secretary/Washington Headquarters Services Arlington, VA	United States	DD68
	DOD Office of the Secretary/Washington Headquarters Services Arlington, VA	United States	DD25
	DOD Office of the Secretary/Washington Headquarters Services Arlington, VA	United States	DD06
	DOD Office of the Secretary/Washington Headquarters Services Arlington, VA	United States	DD23
	DOD Office of the Secretary/Washington Headquarters Services Arlington, VA	United States	DD65
	DOD Office of the Secretary/Washington Headquarters Services Arlington, VA	United States	DD08
	DOD Office of the Secretary/Washington Headquarters Services Arlington, VA	United States	DD58
	DOD Office of the Secretary/Washington Headquarters Services Alexandria, VA	United States	DD29
	DOD Office of the Secretary/Washington Headquarters Services Washington, DC	United States	OTHER
	DOD Office of the Secretary/Washington Headquarters Services Alexandria, VA	United States	OTHER
	DOD Office of the Secretary/Washington Headquarters Services Arlington, VA	United States	OTHER
EEOC FORMS and Documents	Required Uploaded		
	_ ^		

EEOC FORMS and Documents	Required	Uploaded
Reasonable Accommodation Procedure	Υ	Υ
Agency Strategic Plan	Υ	Υ
Alternative Dispute Resolution Procedures	Υ	Υ
Anti-Harassment Policy and Procedures	Υ	Υ
EEO Policy Statement	Υ	Υ
Organization Chart	Υ	Υ
Personal Assistance Services Procedures	Υ	Υ
Diversity Policy Statement	N	N
Human Capital Strategic Plan	N	N
Federal Equal Opportunity Recruitment Program (FEORP) Report	N	Ν
Disabled Veterans Affirmative Action Program (DVAAP) Report	N	N
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	N	N
EEO Strategic Plan	N	N

#### U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

DOD Office of the Secretary/Washington Headquarters Services

For period covering October 1, 2019 to September 30, 2020

**EXECUTIVE SUMMARY: MISSION** 

### **AGENCY MISSION**

Washington Headquarters Services (WHS) is the essential services provider for the Office of the Secretary of Defense (OSD), Department of Defense (DoD) agencies, and DoD offices in the National Capital Region. WHS provides a wide range of centralized capabilities to DoD headquarters, OSD, and DoD components, enabling economies of scale for delivering essential administrative services to fulfill the mission of the Department. In 2019, WHS aligned under the Director of Administration in the Office of the Chief Management Officer (CMO).

WHS services are organized into several directorates and specialty offices. These teams of WHS personnel support the mission of our Defense Department customers by managing DoD-wide programs and operations for the Pentagon Reservation, Mark Center, and DoD-leased facilities in the National Capital Region and several locations across the nation. The WHS vision is to remain a creative, results- driven capabilities provider, recognized for excellence: responsible, reliable, resourceful, and relevant.

WHS delivers essential administrative services to assist these components and offices in fulfilling the mission of DoD. Under the leadership of Director Thomas M. Muir, WHS supports the establishment of a model equal employment opportunity (EEO) program as required by the U.S. Equal Employment Opportunity Commission (EEOC), under Management Directive (MD) 715. This report covers WHS and components serviced by WHS.

# EQUAL EMPLOYMENT OPPORTUNITY PROGRAM MISSION

The mission of the Office of Equal Employment Opportunity Programs (EEOP) is to foster an inclusive and respectful workplace environment that allows all personnel to succeed as they support the defense of our nation. Ou<u>r goals</u> complement the strategic goals of our organization.

The EEOP is responsible for the implementation of: Civilian Equal Employment Opportunity Process, Military Equal Opportunity Process Information and Referral, Affirmative Employment Program, and the Alternative Dispute Resolution Program.

The mission of the Diversity, Disability, and Recruitment Division is to foster a diverse workforce and an inclusive work environment that ensures equal opportunity through program development, workforce analysis, recruitment, retention, and awareness to best serve our customers. DDR conducts strategic workforce analysis, evaluation of policies, practices, and procedures that may benefit diversity and inclusion efforts, and the creation of action plans consistent with the development of a model Equal Employment Opportunity, diversity, and inclusive environment. DDR manages recruiting for

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all special recruitment program functions for the WHS-serviced organizations, including information concerning employment programs for students, recent graduates, veterans, and individuals with disabilities. DDR also

oversees Reasonable Accommodations for individuals with disabilities who are applicants or employees of WHS-serviced organizations.

DDR is responsible for preparing the DVAAP, FEORP, MD-715, and for managing Special Employment Programs.

### MAJOR ACTIVITIES AND ACCOMPLISHMENTS

The following six essential elements of a Model Equal Employment Opportunity Program include the Agency's EEO program and several noteworthy accomplishments in Fiscal Year 2019 (FY 2019).

### **MODEL EEO PROGRAM STATUS**

During FY 2019, WHS addressed EEO program deficiencies reported in prior years. For example, the agency now conducts trend analysis of the effects of management/personnel policies, procedures and practices on EEO groups.

The following program deficiencies may still exist in WHS' EEO and Disability programs:

- The agency's FY 2018 MD-715 report does not include complete workforce data tables, including applicant flow data in tables A/B 7, 9, 11 and 12;
- The agency's anti-harassment policy does not comply with EEOC guidance;
- The agency has not posted its Affirmative Action Plan on its public website;
- The agency has not posted personal assistance services procedures on its public website; The
  agency has not submitted its updated reasonable accommodation procedures to EEOC for review;
- The agency does not have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements.

Part H of this report contains WHS planned activities to reach compliance on these deficiencies.

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#### **ELEMENT 1: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP:**

WHS Issues Annual Equal Employment Opportunity (EEO) Policy Statements: As is customary each year, five Agency-wide EEO policy statements of: EEO and Diversity, Prevention of Harassment, Employment and Retention of People with Disabilities, Federal Employee Anti- discrimination and Retaliation Act (no FEAR Act), and Alternative Dispute Resolution (ADR) policies were timely reissued and distributed to the workforce during the EEO, Anti-Harassment, and Diversity Training.

**7th Annual Senior Executive Diversity Seminar (SEDS):** Per DoD requirement, DDR sponsored a mandatory 2-day seminar for all senior leaders newly appointed to the grade of Brigadier General or Rear Admiral and all new members of the Senior Executive Service. The 2019 SEDS curricula included a combination of cultural competency, unconscious bias, the New Inclusion Quotient, a government mandate via Executive Order 13583. The seminar was grounded in science-based research and includes thought-provoking interactive exercise and honest dialogue, as relates to mission accomplishment, team performance and strategic attainment of personnel diversity in order to accomplish the mission of the Department of Defense.

## ELEMENT 2. INTEGRATION INTO AGENCY'S STRATEGIC MISSION:

**EEOP Director Involvement:** The EEOP Director reports directly to the Director of WHS, and met weekly with the Deputy Director of WHS. Additionally, she advised the Director of WHS and senior leaders on strategies that promote an environment free of discrimination. In FY 2019, the EEOP Director attended monthly WHS Leadership staff meetings and kept members apprised of EEO trends, progress, and concerns. In addition, the EEOP Director participated in various forums such as the Human Resource Directorate Customer Focus Forum, Senior Administrative Officers Forum, Defense Diversity Working Group, and the WHS Quarterly Facility Access Task Force, creating a close working relationship within the Agency. The Director also attended the Mark Center Building Council meetings to maintain awareness of facilities logistics as relates to architectural barriers.

**State of the Agency Brief:** In FY 2019, the EEOP Director presented the annual State of the Agency EEO Briefing to the WHS Director and Deputy Director. The briefing covered an overall assessment of the Agency's performance in each of the six essential elements of the Model EEO Program as well as the progress made in eliminating/reducing barriers to equal opportunity.

**Mandatory Training:** Over four thousand (4,543) team members completed that WHS mandatory courses which include modules on EEO, Anti-Harassment, Diversity and Inclusion, and ADR.

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**Special Hiring Authorities**: WHS encouraged the use of available hiring authorities, such as Schedule A Excepted Service Hiring Authority (5CFR 213.3102(u)), Veterans Recruitment Appointment (VRA) authority, the Workforce Recruitment Program for College Students and Recent Graduates with Disabilities (WRP), reasonable accommodations, and operationalizing accessible information and communication technology policies, practices, and procedures. The WHS Acquisition Directorate (AD) accommodated onboard Wounded Warriors' growing needs to prepare them for conversion to the 1102 career field as a competitive acquisition professional.

**Recruitment:** WHS heavily engaged with hundreds of race-, disability- and gender-based groups at a range of universities. Engagement involved the passing along opportunities, information, and specific invitations to attend small recruiting events being conducted on a campus.

## ELEMENT 3. MANAGEMENT AND PROGRAM ACCOUNTABILITY

In FY 2019, the Agency continued to meet its compliance obligations:

**DVAAP Report:** The report was submitted in November 2019 to the Defense Civilian Personnel Advisory Service. The following accomplishments were highlighted.

- In support of recruiting and employing disabled veterans, Washington Headquarters Services (WHS) engaged in targeted talent acquisition efforts to seek out and hire qualified disabled veteran candidates, increase internal organizational awareness, and promote Special Employment Programs (SEPs). The Diversity, Disability, and Recruitment Division (DDR) under Human Resources Directorate (HRD) spearheaded these efforts, in addition to implementing diversity and inclusion initiatives.
- DDR actively promoted and collaborated with WHS serviced organizations the benefits and value of Special Employment Programs (SEPs) and shared OPM resources (e.g., Feds Hire Vets website) to recruit, hire, and retain disabled veterans and under-represented groups. We worked with hiring managers, Customer Account Managers (CAMs), and WHS serviced organization customers to

provide guidance, training, and awareness of special hiring authorities to include: Schedule A, Veterans Recruitment Appointment (VRA), Veterans Employment Opportunities Act (VEOA), and other competitive hiring authorities.

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- For this year's National Disability Employment Awareness Month, DDR co-hosted the National Employment Awareness Event with Diversity Management Operations Center (DMOC) and the Office of the Inspector General (OIG). The event provided disabled job seekers, including disabled vets, resources and tips for effective elevator speech techniques, resume review, and constructive feedback for successful job interviews.
- DDR provided resume writing workshops, federal hiring authority info sessions, one-on-one
  assistance, and preliminary interviews at targeted disabled veterans recruiting events, such as the
  Wounded Warrior Education and Hiring Expo to actively recruit for Facilities Services Directorate
  (FSD), Pentagon Force Protection Agency (PFPA), and other WHS serviced organizations with critical
  hiring needs. Other outreach events include:
  - Operation Warfighter, Ft. Belvoir, VA and Walter Reed in Bethesda, MD
  - National Disability Employment Awareness Event, NDEAM
  - Weekly Special Employment Program (SEP) meetings
  - E2I/OWF Outreach Event for Wounded Warriors, Bethesda, MD
  - DoD Veterans Employment Program Office (VEPO) Meetings
  - OPM Recruitment Boot camp (On-site training for supervisors and managers)
  - DoD Recruiters Training
  - DoD Recruiters Consortium
- In coordination with the WHS communication team, WHS utilizes various social media platforms to
  post job announcements, upcoming events, and disabled veterans hiring efforts to broaden reach of
  highly desired candidates, fill crucial positions, and promote WHS organization's diverse and inclusive
  workplace culture.
- WHS continued to provide one-on-one guidance and training on Reasonable Accommodations (RA) aimed to allow individuals with disabilities to apply for a job, perform job functions, enjoy equal access to benefits available to other individuals in the workplace, and most importantly, to thrive and advance within the organization. WHS actively shares RA awareness to supervisors and WHS workforce during Customer Focus Forums, townhalls, leadership meetings, EEO trainings, and Senior Executive Diversity Seminars (SEDS).
- To meet the demand, DDR doubled the size of its Reasonable Accommodations team to support increasing requests and need for interpreters, readers, and Personal Assistance Services (PAS) to all WHS directorates. In addition, DDR developed procedures for PAS to provide workplace task-related assistance for individuals with disabilities.
- Enhancements to iCompass, WHS' web-based learning management system, provided the entire workforce, including disabled employees, easy and convenient access to developmental online course, mandatory trainings and manage Individual Development Plans (IDPs).
- To assist disabled veterans in their development and career advancement, WHS also offered and promoted several DoD and WHS competitive developmental programs, which were open to all qualified candidates to include disabled veterans and under-represented groups.

**FEORP Report:** The report, submitted to DoD in November 2019, included a short narrative of the Agency's promising practices, strategies, and activities related to Hispanic Employment, Mentoring, Career Development, and Recruitment of Individuals with Disabilities. The following accomplishments were highlighted.

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#### Workforce Recruitment Plan

In December 2018, the DDR within the Human Resources Directorate (HRD) developed a Workforce Recruitment Plan to serve as a guide to Customer Service Account Managers (CAMs) and Administrative Officers (AOs). The purpose of this plan is to foster a diverse workforce and an inclusive environment that ensures equal opportunity, leveraging Critical Success Factors (CSFs) through which Washington Headquarters Services (WHS) must excel in order to succeed. WHS has leveraged this plan to help the organizations it supports hire qualified and talented individuals, including providing individuals with needed mission critical skills for hard-to-fill positions, while addressing low representation rates of various workforce groups as compared to their availability in the National Civilian Labor Force.

Since the creation of the Talent Acquisition Team, WHS helped recruit and hire diverse talent in serviced organizations in dire need of new talent to fill crucial positions and hard to fill jobs. For instance, special initiatives with the Pentagon Force Protection Agency and WHS Facilities Services Directorate have begun to close large, long-standing staffing shortfalls. The Talent Acquisition Team is also drafting an internship program for the former to help their recruiting efforts even more. WHS also increased its partnership with universities to acquire top-notch and qualified applicants to participate in our Special Employment Programs (SEPs). Engagement with nearly 40 universities and nine (9) military base transition offices yielded a flow of hundreds of applications across twenty fields.

#### Senior Executive Diversity Seminar (SEDS)

The Senior Executive Diversity Seminar (SEDS) is biannual requirement and fulfills DoD Directive 1350.2 "Department of Defense Military Equal Opportunity (MEO) Program," to provide a mandatory 2-day Senior Executive Equal Opportunity Seminar (SEEOS) to all officers newly appointed to the grade of brigadier general or rear admiral (lower half) and all new members of the Senior Executive Service. Overall, the training introduces senior executives to key elements surrounding diversity, to include both representation and inclusion. This offering places extra emphasis on diversity and inclusion, providing techniques on how to proactively leverage diversity to advance organizational missions, and reduce the instances of equal employment opportunity complaints. The seminar heavily relies upon interactive activities, including a short presentation from all participants.

#### Seminar topics include:

- Leveraging DiSC assessments to Increase Inclusion
- Impact of Unconscious Bias in the Workplace
- Inclusive Intelligence: The New IQ
- Meaningful Conversations to Promote Effective Communication
- How Good Teams Become Great

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- Diversity's Impact on Organizational Performance Metrics
- Personal Action Plan Development
- Federal Employee Viewpoint Survey / Workplace Engagement
- Panel: EEO Challenges / Solutions

The seminar provides a holistic approach and touches on key concepts and creative ways to improve diversity and inclusion in their respective organizations. In addition to speaking on "the importance of diversity," leaders and keynote speakers convey their vision regarding change and improving mission performance, and how tapping into the diversity of a workforce to improve teamwork and engagement can achieve those ends.

#### Special Employment Programs

In support of recruiting and employing diverse talent, Washington Headquarters Services (WHS) engages in targeted talent acquisition efforts to seek out and hire qualified candidates. DDR actively promote and collaborate with WHS serviced organizations the benefits and value of Special Employment Programs (SEPs) and shared OPM resources to recruit, hire, and retain people with disabilities, Hispanics, and under-represented groups. We work with hiring managers, Customer Account Managers (CAMs), and WHS serviced organization customers to provide guidance, training, and awareness of special hiring authorities to include: Schedule A, Pathways Program, Volunteer Student Internship Programs (VSIP), and other competitive hiring authorities.

#### Communication

In collaboration with the WHS communication team and serviced organizations, WHS utilizes various communication platforms (social media, blogs, InfoNet, newsletters, articles, etc.) to post job announcements, upcoming events, diversity and inclusion efforts, training, workshops, and hiring efforts to broaden reach of diverse highly desired candidates, fill crucial positions, and promote WHS organizations' diverse and inclusive workplace culture.

#### Demographic Dashboards

The Diversity, Disability, and Recruiting Division (DDR) and Equal Employment Opportunity Program (EEOP) office provided leadership reports on individuals with targeted disabilities (IwTDs) and highlighted those components that had met or exceeded our goal of 2% employees with targeted disabilities. DDR also implemented its goal of providing each WHS component with a demographic analysis of the component's populations to inform workforce planning to include recruiting and succession planning. The demographic dashboard includes the following analyses: overall race, gender, national origin (RGNO); senior grades by RGNO, and disability status; major occupations by RGNO and disability status; onboard ratio of individuals with targeted and reportable disabilities; veterans; generations; and retirement eligibility.

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**Audit of Supervisory Critical Element:** The team conducted a random sample review of non-SES/SL/ST supervisors' performance plans, which revealed that approximately 69% of this group was or will be rated against an EEO element/ standard. WHS continues to identify and strategically reinforce that all non- SES/SL/ST supervisors' performance plans should contain an EEO element/standard.

WHS Accessibility Task Force: WHS maintained the WHS Accessibility Task Force to advocate and provide a voice for persons with disabilities in buildings owned and operated by WHS. WHS and DoD's Office of Diversity, Equity and Inclusion (ODEI) created a smaller sub-committee, the WHS Accessibility Working Group, to address and resolve the accessibility concerns. Both groups meet quarterly to discuss facility accessibility issues and to resolve and address concerns. Facilities Services Directorate (FSD) co-hosted accessibility town halls to solicit input from facility tenants and management, accessibility advocates, and disability program managers.

### **ELEMENT 4. PROACTIVE PREVENTION**

**Reasonable Accommodations (RA):** WHS ensured all new employees were aware of the RA program and assistive technologies available to modify workspaces and/or effectively help those requesting accommodations with their acclimation to the workplace. Requests for RA were processed within the 30- day timeframe required by Administrative Instruction 114.

**Anti-Harassment Policy Statement:** The FY 2019 Anti-Harassment policy statement was signed and distributed to the workforce, as well as provided as part of the following training modules: EEO & Diversity, HR & Leadership for New Supervisors, and Team Leader Training. The formal anti-harassment procedures, which are separate from the EEO process, are currently in coordination to be implemented as a WHS administrative instruction.

**PWD Reports (Leadership Meeting):** The Agency continued to provide reports to Senior Leaders on a quarterly basis. The report provided data analysis, trends, and the current status of the People with Disabilities (PWD) workforce for each Directorate. The Agency's Senior Leaders are committed to increasing and promoting diversity and inclusion, as well as achieving and retaining the DoD goal of 2% of hiring People with Targeted Disabilities (IWTD). The continued goal for the next fiscal year is to place a strategic focus on increasing and retaining the numbers of PWD within the Agency. DDR also educated WHS about the EEOC goal for federal agencies of 12% employees with reportable disabilities.

## **ELEMENT 5. Efficiency**

Alternate Dispute Resolution (ADR): The ADR Program provided essential services that contributed to the WHS mission

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by helping employees resolve disputes, address workplace concerns, and manage conflict when it arises. Additionally, the ADR Program provided managers with services to assist in assessing the workplace environment so that issues can be addressed early. In FY 2019, the ADR Program conducted 21 mediations to address EEO complaints of alleged discrimination with a 24% resolution rate and seven (7) sessions to address non-EEO workplace issues with an 86% resolution rate. The office also facilitated six (6) climate surveys, five (5) sensing sessions, and two (2) group facilitations. Other activities included conducting 10 training sessions titled "Basics of Conflict Management and the ADR Process." EEOP hosted its annual ADR Symposium with workshops, speakers, and various displays showing the benefits and examples of what to expect within the ADR process. The EEO Complaints Manager and the EEO Specialists actively encourage the use of ADR at each stage of the complaint process, providing positive information on ADR and its benefits in EEO related matters.

**CMO Office of the Ombudsman:** The Office of the Ombudsman provided an informal and confidential forum to hear and help address individual and systemic organizational concerns. In 2019 the Office of the Ombudsman received 263 visitors addressing 382 issues.

Complaints (Status and Update): During FY 2019, 76 pre-complaints resulted in 45 individuals filing formal complaints. There were 11 settlements and 10 withdrawals (no complaints filed). Most of the formal EEO complaints were based on claims of sex, reprisal, race, disability, and/or age discrimination. ADR was offered 18 times (reflecting approximately a 24% offer rate) and 18 individuals (100%) accepted ADR. The Agency continued to utilize the MicroPact iComplaints software to track and process complaints in accordance with regulatory timelines.

## ELEMENT 6. RESPONSIVENESS AND LEGAL COMPLIANCE

**Compliance with EEOC:** WHS fully complied with all Laws, including EEOC regulations, Orders, Decisions, and Settlements Agreements. All documents requiring legal sufficiency review were coordinated with WHS, Office of General Counsel (OGC). EEOP posted all required No FEAR Act information, provided required training, and timely filed MD-715, EEOC Form 462 reports, and other reports required by EEOC and OPM. WHS timely implemented necessary corrective actions such as facility postings, training, and reviewed disciplinary actions as appropriate.

Office of General Counsel: EEOP continued to maintain a cooperative relationship with WHS OGC, DPAA OGC, and DSCA OGC and consulted on legal issues, matters of mutual interest and sought advice and expertise when dealing with unique situations.

**EEO Investigations:** Investigations were completed by the DoD, Defense Human Resources Activity (DHRA), Diversity Management Operations Center (DMOC), Investigations and Resolutions Directorate (IRD). EEOP does not control the timeframes for investigations but expects IRD to adhere to the 180 calendar-day timeframe allowed for such investigations. EEOP took proactive steps to ensure that IRD was timely notified of a request for investigations, submitted case files prior to their request for documents, and responded to requests in a timely manner.

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<b>EEO, Diversity, and HR Training</b> . WHS proactively engaged in various training efforts that had as a foundation, the EEOC compliance requirements. Trainings included unlawful discrimination on protected bases (to include race and disability), and an overview of WHS workforce statistics based on race, gender, national origin, and disability. One thousand two hundred seventy-four employees including managers, and team leads received classroom style EEO, Anti-Harassment and Diversity training; the module also included the reasonable accommodations process. The HRD Individual and Organizational Development Division (I&OD) continued to train new supervisors to address challenges they may encounter and provide the knowledge, skills, and tools necessary to successfully manage a diverse workforce.

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**EXECUTIVE SUMMARY: WORKFORCE ANALYSES** 

## WORKFORCE ANALYSIS

This year's workforce analysis provides information regarding the current composition of the WHS and Serviced Components' workforce and identified multi-year employment trends impacting the workforce as a whole. Demographic data was extracted from the Business Objects Enterprise Reporting Service (BOERS). The U.S. Census Bureau 2010 National Civilian Labor Force (NCLF)1 census data was used as a benchmark.

At the end of FY 2019, the total workforce (permanent and temporary) of WHS and serviced components decreased from 6,128 to 5,339 representing a negative net change of 12.9%. Part of this was due to components shifting service arrangements to other servicers. The overall workforce consists of 3,604 (67.5%) males and 1,735 (32.5%) females, representing a net change of -9.04% and -19.9%, respectively.

Hispanics (males and females) and White females have low participation rates when compared to the appropriate benchmarks (*Table A-1*):

- Hispanic males 3.09% versus NCLF of 5.17%
- Hispanic females 1.48% versus NCLF of 4.79%
- White females 18.41% versus NCLF of 34.03%

The overall representation of WHS and Serviced Components employees by race/national origin has remained relatively constant over the last five years. Hispanic representation largely remained steady during this period, but remains below the NCLF; for their respective demographics, males are -2.08% below the NCLF; females -3.31% below the NCLF. Representation of White females has steadily declined. White male representation exceeds the NCLF by 8.59%, which is slightly lower than 2017's differential. Data reflects a greater than expected representation of Black and Native Hawaiian/Pacific Islander employees, as well as employees who identified as two or more races. Conversely, representation of Asians is lower than expected when compared to the NCLF.

DoD adopted the Federal goal of 2% for hiring IwTD; in addition, WHS strives to meet the goal of 12% of on-board employees with reportable disabilities. In FY 2019, the Agency hired 34 employees (5.31%) who reported having a disability and seven (7) employees (1.09%) who reported having a targeted disability. IwTD comprise 1.24% of the workforce of WHS and Serviced Components, and increase of 0.16% from 2018. Employees with reportable disabilities are now 8.82% of the total workforce, compared to 9.20% at the end of FY 2018.

When compared to the Federal goals for employment of people with disabilities:

- PwD<sub>3</sub> 8.79 versus Federal goal of 12%
- lwTD<sub>4</sub> 1.23% versus Federal goal of 2%

## **Upward Mobility Analysis**

Consistent with MD-715's requirement to assess whether any policy, practice, procedure, or condition lead to a negative

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correlation with race, national origin, gender or disability, WHS reviewed demographic data to determine whether particular groups are hindered from reaching the highest levels of leadership despite their presence in positions that comprise the feeder pools. Additionally, EEOC instructs agencies to identify instances where the participation rate for a group occupying a higher-level position is lower than the corresponding participation rate in the lower level feeder pools for that positions. ( *Tables A and B 3-1, 3-2; A and B 4-1; A and B 4-2; A and B 11; and A and B 13*).

In FY 2019, the following groups had a lower representation rate at the higher pay levels as compared to the NCLF:

- Hispanic males at GS-14 and above
- Hispanic females at SES
- White males at GS-8 and -9
- White females at GS-7 and -11
- African American males at GS-14 and above
- African American females at GS-15 and above
- Asian females at GS-15
- Employees with targeted disabilities at GS-15 and above

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**EXECUTIVE SUMMARY: ACCOMPLISHMENTS** 

## **Applicant Flow Data**

In FY 2016, HRD acquired access to the applicant flow data directly from the OPM's USA Staffing Manager system. Due to lingering technical issues, WHS again received less than comprehensive applicant flow data for FY 2019, precluding sufficient analysis.

## **Major Occupations**

WHS has seven (7) major occupation groups: general attorney (0905), miscellaneous administration and programs (0301), information technology management (2210), police (0083), management and program analysis (0343), foreign affairs (0130), and security administration (0080). In FY 2019, there were 4,477 permanent employees. Of these permanent employees, there were 164 contracting officers, 645 miscellaneous administration and programs specialists, 106 information technology specialists, 681 police officers, 506 management and program analysts, 211 foreign affairs specialists. Total males for all but contracting officers participated above the occupational National Civilian Labor Force (NCLF) rates.

There were several instances where WHS employee strength was more than 5% below their occupational NCLF rates, to include White females in all major occupations except 0343 and 1102 and White males in series 1102. Hispanics were underrepresented in all major occupations except for males in the 0803 series. Black/African Americans were strong except in the 0130 job series. (*Table A6*).

## **New Hires**

WHS and serviced components hired 330 permanent and 310 temporary employees in FY 2019. Overall, females were hired for permanent positions (33.75%) at a lower rate than males (66.25%). Whites (76.7%) were hired at almost five times the rate of Black/African Americans (14.0%); the next highest hire rate was Asians at 4.06%. A total of 17 Hispanics were hired at a rate of 2.66%. There were 22 permanent and 40 temporary PwDs hired in FY 2019 (See Table B7 & B7T).

## **Employee Recognition and Awards**

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A review of *Table A13* reflects that males were given more time-off awards than females. Males received 70.31% of all time-off awards as compared to approximately 29.69% of all time-off awards to females. Similarly, males received higher percentages of cash awards than females. Consistent with representation in the workforce, White and Black employees received the highest percentage of recognition and awards.

On average, in the category of cash awards \$100-\$500, females received higher cash awards than males (\$434 versus \$341). A review of *Table B13* depicts the average cash award for PwD was commensurate with all employees across all categories;. (See *Tables A13 & B13*).

# Selections for Internal Competitive Promotions for Major Occupations

At this juncture, WHS does not have access to applicant flow data for internal selections, but will have access to that information through the USA Staffing Cognos application for FY 2019. (*Table A9*)

## **Employee Separations**

There were a total of 665 employee separations, of which 94.9% were Voluntary and 5.1% were Involuntary (*Tables A14 & B14*). Females voluntarily separated at 33.5%, which is higher than erall

overall representation at 32.5%. Of the 665 separations, 20 (3.0%) were Hispanic, 497 (74.7%) were White, 114 (17.1%) were African American, 18 (2.7%) were Asian, 1 (0.2%) was American Indian, and 4 (0.6%) were Two or More Races. There were 34 involuntary separations, of which 29.4% were females and 70.6% males. White males and Black females were involuntarily separated at rates higher than their representation in the workforce. There were 3 lwTD (0.5%) who voluntary separated from the Agency, while none were involuntarily separated, each of which was below their representation in the overall workforce.

## **Hispanics in the Federal Workforce**

The following triggers were identified:

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### **Total workforce:**

- Hispanic males 3.09% versus NCLF of 5.17%
- Hispanic females 1.48% versus NCLF of 4.79%

## **Upward mobility analysis**

The following groups had a lower representation rate at the higher pay level as compared to the pay distribution of the total workforce:

- Hispanic males at GS 14 and above
- Hispanic females at GS 14 and above

Hispanic males and females progressed to GS-13 before registering a decrease in representation at the SES level.

## **Major occupations (Table A6, Permanent)**

Hispanics were well underrepresented in all major occupations with the exception of males being overrepresented in the 0083 series.

## **New Hires (Table A8)**

A total of 17 Hispanics were hired at a rate of 2.7%. Both males and females were hired at rates lower than their presence in the NCLF.

## **Separations (Table A14)**

Separations were well below NCLF representation: 5 females (0.7%) and 15 males (2.3%) were separated (no separations were involuntary).

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### **Solutions**

HRD provides periodic updates to leadership and the workforce on the recruitment and employment of Hispanics/Latinos. Also, consistent with the WHS Targeted Recruitment Plan, HRD provides feedback about current office operations with the goal of determining alternative methods to increase the success of the office's programs. The Plan is based on participation and efforts of WHS leadership, directorates and offices, and the HRD Recruitment and Outreach specialists. HRD requested that each office assign a representative to partner with the recruitment and outreach specialists. In 2016, HRD established

Customer Account Managers (CAMS) to serve as liaisons between HRD and the customer. The CAMS:

- provide feedback to HRD about operations of their assigned customers;
- assist customers with determining alternative methods to increase the success of the office's programs through utilization of special appointment authorities (e.g. Student Education Employment Program, Temporary Summer Hire Authority, Presidential Management Intern (PMI) authority);
- partner with customers and DDR on opportunities for recruitment and advancement of employees with targeted disabilities, to include Hispanic/Latinos; and
- assist customers with developing customer-specific, office-specific, and occupation-specific hiring from the Hispanic/Latino community.

WHS utilizes student outreach and the Pathways Recent Graduates and Internship programs to broaden WHS' recruitment reach into educational institutions with diverse populations, to include Hispanics/Latinos. We continue to advertise internships, both paid and unpaid, at Hispanic Serving Institutions (HSIs).

HRD, DDR coordinated with the Public Affairs communication team to implement social media recruitment through social media platforms such as: LinkedIN, Facebook, Twitter, and through the DoD Blog. Posted content to include: job fairs, new position opportunities, upcoming events, and more relating to the Diversity, Disability and Recruitment program with a goal to reach a broader audience of highly desired candidates, inclusive of Hispanics/Latinos, to fill the crucial positions in IT, security, and cybersecurity.

#### The Way Ahead

WHS will renew its barrier analysis effort for 2019, with an attendant review of WHS's policies, practices to leverage diversity and inclusion in areas to include: recruitment, performance management, training, learning and development, and mentoring. WHS will use data driven strategies to advance representational diversity and inclusion through its 2019 Targeted Recruitment Plan with focus on

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Hispanic males and females, White females, and People with Disabilities.

As part of the recruitment and training strategies, WHS will integrate social media to publicize use of the special hiring authorities and positions in major occupations with underrepresentation of certain groups. We will incorporate more training of DDR employees and collaboration with customers and customer account managers (CAMS), who are assigned to facilitate human resources services to specific customers in our serviced populations.

WHS will utilize applicant flow data to identify potential barriers to hiring a diverse workforce, and review hiring processes to provide recommendations on the removal of barriers to the inclusion of candidates with disabilities and targeted disabilities.

WHS will continue to develop and advocate for the business case for the establishment of the consolidated reasonable accommodations fund (CRAF).

WHS will continue to develop and implement required policies.

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### The Way Ahead

WHS will renew its barrier analysis effort for 2019, with an attendant review of WHS's policies, practices to leverage diversity and inclusion in areas to include: recruitment, performance management, training, learning and development, and mentoring. WHS will use data driven strategies to advance representational diversity and inclusion through its 2019 Targeted Recruitment Plan with focus on Hispanic males and females, White females, and People with Disabilities.

As part of the recruitment and training strategies, WHS will integrate social media to publicize use of the special hiring authorities and positions in major occupations with underrepresentation of certain groups. We will incorporate more training of DDR employees and collaboration with customers and customer account managers (CAMS), who are assigned to facilitate human resources services to specific customers in our serviced populations.

WHS will utilize applicant flow data to identify potential barriers to hiring a diverse workforce, and review hiring processes to provide recommendations on the removal of barriers to the inclusion of candidates with disabilities and targeted disabilities.

WHS will continue to develop and advocate for the business case for the establishment of the consolidated reasonable accommodations fund (CRAF).

WHS will continue to develop and implement required policies.

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	CONTINUING PROGRAMS			
				am the
	(Insert Name Above)		t official /grade above)	-
Principal EEO Director/Official	for			
		(Insert Agency/Component Nar	me above)	
elements as prescribed by EEO I further evaluation was conducted	nual self-assessment of Section 71 MD-715. If an essential element v d and, as appropriate, EEO Plans Federal Agency Annual EEO Pro	vas not fully compliant with the for Attaining the Essential Elem	standards of EEO MD-715, a	
management or personnel policy	work force profiles and conducte , procedure or practice is operatin to Eliminate Identified Barriers, a	g to disadvantage any group bas	ed on race, national origin,	
I certify that proper documentation	on of this assessment is in place a	nd is being maintained for EEOO	C review upon request.	
Signature of Principal EEO Directifies that this Federal Agence EEO MD-715.	ctor/Official y Annual EEO Program Status Re	eport is in compliance with	Date	
Signature of Agency Head or Ag	ency Head Designee		Date	

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Essential Element: A Demonstrated Commitment From agency Leadership								
<b>^</b>	Compliance Indicator		1.100000	Measure Has Been Met				For all unmet measures, provide a
•	Measures	. The agency issues an effective, up-to-date EEO policy statement.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report		
clearly co	ally issue a signed and dated EEO policy statement on agency letterhead that ency's commitment to EEO for all employees and applicants? If "Yes", please date in the comments column. [see MD-715, ll(A)]	X			Yes 10/1/2018			
pregnanc reprisal) o any addit	ey, sexual orientation contained in the law	statement address all protected bases (age, color, disability, sex (including and gender identity), genetic information, national origin, race, religion, and sex EEOC enforces? [see 29 CFR § 1614.101(a)] If the EEO policy statement covers arital status, veteran status and political affiliation), please list them in the	X			Yes		

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1	Compliance Indicator			re Has 1 Met		For all unmet measures, provide a
+	Measures	A.2. The agency has communicated EEO policies and procedures to all employees.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
A.2.a. De	oes the agency disse	minate the following policies and procedures to all employees:				
A.2.a.1.	Anti-harassment pol	icy? [see MD 715, ll(A)]	X			Yes
A.2.a.2.	Reasonable accomm	odation procedures? [see 29 CFR § 1614.203(d)(3)]	X			Yes
A.2.b. Downwebsite:	oes the agency prom	inently post the following information throughout the workplace and on its public				
		t information for its EEO Counselors, EEO Officers, Special Emphasis Program ? [see 29 C.F.R § 1614.102(b)(7)]	X			Yes
		ncerning the EEO program, laws, policy statements, and the operation of the EEO [FR §1614.102(b)(5)]	X			Yes
	Reasonable accommaddress in the comm	odation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the ents column.	X			Yes
A.2.c. De	oes the agency infor	m its employees about the following topics:				
		ess? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If "yes", please provide which such training is delivered.	X			Yes
A.2.c.2.	ADR process? [see I	MD-110, Ch. 3(II)(C)] If "yes", please provide how often.	X			Yes
A.2.c.3. how ofte		odation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If "yes", please provide	X			Yes
		gram? [see EEOC Enforcement Guidance on Vicarious Employer Liability for servisors (1999), § V.C.1] If "yes", please provide how often.	X			Yes
		appropriate in the workplace and could result in disciplinary action? [5 CFR e provide how often.	X			Yes
1	Compliance Indicator			re Has 1 Met		For all unmet measures, provide
	Measures	A.3. The agency assesses and ensures EEO principles are part of its culture.	Yes	No	N/A	a brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
superior		de recognition to employees, supervisors, managers and units demonstrating equal employment opportunity? [see 29 CFR § 1614.102(a)(9)] If "yes", provide comments section.	X			Yes
A.3.b. D	oes the agency utiliz	e the Federal Employee Viewpoint Survey or other climate assessment tools to O principles within the workforce? [see 5 CFR Part 250]'	X			Yes

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Essential Element: B Integration of EEO into the agency's Strategic Mission									
1	Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a			
+	Measures	B.1. 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.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report			
		immediate supervisor of the person ("EEO Director") who has day-to-day control 0 CFR §1614.102(b)(4)]	X			Yes			
agency h		does not report to the agency head, does the EEO Director report to the same mission-related programmatic offices? If "yes," please provide the title of the comments.	X			Yes			
	Does the agency's o 514.102(b)(4)]	rganizational chart clearly define the reporting structure for the EEO office? [see 29	X			Yes			
managen	B.1.b. Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]								
managen program	B.1.c. During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comments column.								
		or regularly participate in senior-level staff meetings concerning personnel, budget, lorce issues? [see MD-715, II(B)]	X			Yes			

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Compliance Indicator		Measu Beer	re Has 1 Met		For all unmet measures, provide
Measures	B.2. The EEO Director controls all aspects of the EEO program.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
to promote EEO and to ident	sponsible for the implementation of a continuing affirmative employment program ify and eliminate discriminatory policies, procedures, and practices? [see MD-110, .102(c)] If not, identify the office with this authority in the comments column.	X			Yes
B.2.b. Is the EEO Director re §1614.102(c)(4)]	sponsible for overseeing the completion of EEO counseling? [see 29 CFR	X			Yes
	sponsible for overseeing the fair and thorough investigation of EEO complaints?  [This question may not be applicable for certain subordinate level components.]	X			Yes
	sponsible for overseeing the timely issuance of final agency decisions? [see 29 question may not be applicable for certain subordinate level components.]	X			
B.2.e. Is the EEO Director re 1614.102(e); 1614.502]'	sponsible for ensuring compliance with EEOC orders? [see 29 CFR §§	X			Yes
	sponsible for periodically evaluating the entire EEO program and providing ement to the agency head? [see 29 CFR §1614.102(c)(2)]	X			Yes
B.2.g. If the agency has subo coordination for the component	rdinate level components, does the EEO Director provide effective guidance and ents? [see 29 CFR §§ 1614.102(c)(2); (c)(3)]	X			Yes
Compliance Indicator			re Has 1 Met		For all unmet measures, provide a
Measures	B.3. The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
EEO issues, including strateg	cials participate in agency meetings regarding workforce changes that might impact gic planning, recruitment strategies, vacancy projections, succession planning, and development opportunities? [see MD-715, II(B)]	X			Yes
	rent strategic plan reference EEO / diversity and inclusion principles? [see ase identify the EEO principles in the strategic plan in the comments column.	X			Yes

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Compliance Indicator			ıre Has n Met		For all unmet measures, provide
Measures	B.4. The agency has sufficient budget and staffing to support the success of its EEO program.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
	1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to EEO program, for the following areas:				
B.4.a.1. to conduct a self-ass	sessment of the agency for possible program deficiencies? [see MD-715, II(D)]	X			Yes
B.4.a.10. to effectively man	age its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]	X			Yes
B.4.a.11. to ensure timely ar	nd complete compliance with EEOC orders? [see MD-715, II(E)]	X			Yes
B.4.a.2. to enable the agency	y to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	X			Yes
	ly, and fairly process EEO complaints, including EEO counseling, investigations, legal sufficiency reviews? [see 29 CFR §§ 1614.102(c)(5); 1614.105(b) – (f); [IV); MD-715, II(E)]	X			Yes
retaliation, harassment, relig	visors and employees with training on the EEO program, including but not limited to gious accommodations, disability accommodations, the EEO complaint process, and and III(C)] If not, please identify the type(s) of training with insufficient funding in	X			Yes
	n, accurate, and effective field audits of the EEO programs in components and the see 29 CFR §1614.102(c)(2)]	X			Yes
B.4.a.6. to publish and distri	ibute EEO materials (e.g. harassment policies, EEO posters, reasonable s)? [see MD-715, II(B)]	X			Yes
tracking, workforce demogra	e data collection and tracking systems for the following types of data: complaint aphics, and applicant flow data? [see MD-715, II(E)] If not, please identify the nding in the comments section.	X			Yes
Employment Program, and I	nister its special emphasis programs (such as, Federal Women's Program, Hispanic People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR 02(t) and (u); 5 CFR § 315.709]	X			Yes
B.4.a.9. to effectively manageneous Enforcement Guidance on V	ge its anti-harassment program? [see MD-715 Instructions, Sec. I; EEOC /icarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.	X			Yes
B.4.b. Does the EEO office 1614.102(a)(1)]	have a budget that is separate from other offices within the agency? [see 29 CFR §	X			Yes
B.4.c. Are the duties and res 6(III)]	sponsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), &	X			Yes
	re that all new counselors and investigators, including contractors and collateral required 32 hours of training, pursuant to Ch. 2(II) (A) of MD-110?	X			Yes
	are that all experienced counselors and investigators, including contractors and eceive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of	X			Yes

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Compliance Indicator		Measure Has Been Met			For all unmet measures, provide
Measures	B.5. The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
	614.102(a)(5), have all managers and supervisors received orientation, training, illities under the following areas under the agency EEO program:				
B.5.a.1. EEO complaint proc	ess? [see MD-715(II)(B)]	X			Yes
B.5.a.2. Reasonable Accomm	nodation Procedures? [see 29 CFR § 1614.102(d)(3)]	X			Yes
B.5.a.3. Anti-harassment poli	icy? [see MD-715(II)(B)]	X			Yes
	erial, communication and interpersonal skills in order to supervise most effectively employees and avoid disputes arising from ineffective communications? [see	X			Yes
	on the federal government's interest in encouraging mutual resolution of disputes ith utilizing ADR? [see MD-715(II)(E)]	X			Yes
Compliance Indicator		Measu Beer	re Has 1 Met		For all unmet measures, provide
Measures	B.6. The agency involves managers in the implementation of its EEO program.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
B.6.a. Are senior managers in Instructions, Sec. I]	nvolved in the implementation of Special Emphasis Programs? [see MD-715	X			Yes
B.6.b. Do senior managers pa	X			Yes	
	tified, do senior managers assist in developing agency EEO action plans (Part I, nary)? [see MD-715 Instructions, Sec. I]	X			Yes
2	accessfully implement EEO Action Plans and incorporate the EEO Action Plan gic plans? [29 CFR §1614.102(a)(5)]	X			Yes

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		Essential Element: C Management and Program Accountability				
	Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a
• N	Measures	The agency conducts regular internal audits of its component and field offices.  Yes	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
	0 , 0	arly assess its component and field offices for possible EEO program deficiencies?  Offices for possible EEO program deficiencies?  Offices for possible EEO program deficiencies?	X			Yes
C.1.b. Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.						Yes
	e component and [see MD-715, II(	I field offices make reasonable efforts to comply with the recommendations of the C)]	X			Yes

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	Compliance ndicator			re Has 1 Met		For all unmet measures, provide
• M	1easures	C.2. The agency has established procedures to prevent all forms of EEO discrimination.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
EEOC's enfo	orcement guidan	shed comprehensive anti-harassment policy and procedures that comply with ce? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	X			Yes
to the level o	of unlawful haras	ment policy require corrective action to prevent or eliminate conduct before it rises ssment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for pervisors (1999), § V.C.1]	X			Yes
		blished a firewall between the Anti-Harassment Coordinator and the EEO Director?  EO Program Must Have an Effective Anti-Harassment Program (2006)]	X			Yes
allegations?	[see Enforcemer	re a separate procedure (outside the EEO complaint process) to address harassment at Guidance on Vicarious Employer Liability for Unlawful Harassment by uidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	X			Yes
		ure that the EEO office informs the anti-harassment program of all EEO counseling [See Enforcement Guidance, V.C.]	X			Yes
allegations, i Veterans Aff Commissary	including those in fairs, EEOC App Agency), EEOC	iduct a prompt inquiry (beginning within 10 days of notification) of all harassment nitially raised in the EEO complaint process? [see Complainant v. Dep't of beal No. 0120123232 (May 21, 2015); Complainant v. Dep't of Defense (Defense C Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage in the comments column.	X			Yes
	the agency's train [see 29 CFR §10	ning materials on its anti-harassment policy include examples of disability-based 614.203(d)(2)]	X			Yes
		shed disability reasonable accommodation procedures that comply with EEOC's see 29 CFR §1614.203(d)(3)]	X			Yes
		agency official or other mechanism in place to coordinate or assist with processing modations throughout the agency? [see 29 CFR §1614.203(d)(3)(D)]	X			Yes
		blished a firewall between the Reasonable Accommodation Program Manager and 110, Ch. 1(IV)(A)]	X			Yes
		ure that job applicants can request and receive reasonable accommodations during at processes? [see 29 CFR §1614.203(d)(1)(ii)(B)]	X			Yes
within a max		ecommodation procedures clearly state that the agency should process the request f time (e.g., 20 business days), as established by the agency in its affirmative action $3(d)(3)(i)(M)$	X			Yes
within the tir	me frame set fort	cess all initial accommodation requests, excluding ongoing interpretative services, the in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please nely-processed requests, excluding ongoing interpretative services, in the comments	X			Yes
comply with		shed procedures for processing requests for personal assistance services that tions, enforcement guidance, and other applicable executive orders, guidance, and 4.203(d)(6)]	X			Yes
C.2.c.1. Does public websi column.	s the agency pos te? [see 29 CFR	t its procedures for processing requests for Personal Assistance Services on its §1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments	Х			Yes

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Compliance Indicator		Measure Has Been Met							For all unmet measures, provide
Measures	C.3. The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	Yes	No	N/A	a brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report				
	1614.102(a)(5), do all managers and supervisors have an element in their valuates their commitment to agency EEO policies and principles and their gram?	X			Yes				
C.3.b. Does the agency required on the following activities:	ire rating officials to evaluate the performance of managers and supervisors based								
C.3.b.1. Resolve EEO proble MD-110, Ch. 3.I]	ems/disagreements/conflicts, including the participation in ADR proceedings? [see	X			Yes				
C.3.b.2. Ensure full cooperati and investigators? [see 29 CF	ion of employees under his/her supervision with EEO officials, such as counselors FR §1614.102(b)(6)]	X			Yes				
C.3.b.3. Ensure a workplace t [see MD-715, II(C)]	that is free from all forms of discrimination, including harassment and retaliation?	X			Yes				
	nate supervisors have effective managerial, communication, and interpersonal skills with diverse employees? [see MD-715 Instructions, Sec. I]	X			Yes				
C.3.b.5. Provide religious acc 29 CFR §1614.102(a)(7)]	commodations when such accommodations do not cause an undue hardship? [see	X			Yes				
C.3.b.6. Provide disability ac 29 CFR §1614.102(a)(8)]	ecommodations when such accommodations do not cause an undue hardship? [ see	X			Yes				
C.3.b.7. Support the EEO pro	ogram in identifying and removing barriers to equal opportunity?. [see MD-715,	X			Yes				
C.3.b.8. Support the anti-hara Enforcement Guidance, V.C.	assment program in investigating and correcting harassing conduct?. [see2]	X			Yes				
	nent agreements and orders issued by the agency, EEOC, and EEO-related cases ection Board, labor arbitrators, and the Federal Labor Relations Authority? [see	Х			Yes				
C.3.c. Does the EEO Director or disciplinary actions, for ma §1614.102(c)(2)]	or recommend to the agency head improvements or corrections, including remedial nanagers and supervisors who have failed in their EEO responsibilities? [see 29 CFR	X			Yes				
C.3.d. When the EEO Director implemented by the agency?	or recommends remedial or disciplinary actions, are the recommendations regularly [see 29 CFR §1614.102(c)(2)]	X			Yes				

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1	Compliance Indicator			ire Has n Met		For all unmet measures, provide
+	Measures	C.4. The agency ensures effective coordination between its EEO program and Human Resources (HR) program.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
		d the EEO Director meet regularly to assess whether personnel programs, policies, EOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	X			Yes
program, personne	employee recogniti I policies, procedure	shed timetables/schedules to review at regular intervals its merit promotion on awards program, employee development/training programs, and management/es, and practices for systemic barriers that may be impeding full participation in the [see MD-715 Instructions, Sec. I]	X			Yes
workfore		ave timely access to accurate and complete data (e.g., demographic data for the g programs, etc.) required to prepare the MD-715 workforce data tables? [see 29	X			Yes
		nely provide the EEO office with access to other data (e.g., exit interview data, and grievance data), upon request? [see MD-715, II(C)]	X			Yes
C.4.e. Pu	rsuant to Section II(	C) of MD-715, does the EEO office collaborate with the HR office to:				
C.4.e.1. I MD-715,		mative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d);	X			Yes
C.4.e.2. I	Develop and/or cond	luct outreach and recruiting initiatives? [see MD-715, II(C)]	X			Yes
C.4.e.3. I	Develop and/or prov	ide training for managers and employees? [see MD-715, II(C)]	X			Yes
C.4.e.4. I	dentify and remove	barriers to equal opportunity in the workplace? [see MD-715, II(C)]	X			Yes
C.4.e.5.	Assist in preparing the	he MD-715 report? [see MD-715, II(C)]	X			Yes
•	Compliance Indicator			ıre Has n Met		For all unmet measures, provide
	Measures	C.5. Following a finding of discrimination, the agency explores whether it should take a disciplinary action.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
		a disciplinary policy and/or table of penalties that covers discriminatory conduct? ); see also Douglas v. Veterans Administration, 5 MSPR 280 (1981)]	X			Yes
conduct?		es the agency discipline or sanction managers and employees for discriminatory .102(a)(6)] If "yes", please state the number of disciplined/sanctioned individuals in the comments.	X			One finding of discrimination where the management official is no longer with the Agency.
agency in		ding of discrimination (or settles cases in which a finding was likely), does the supervisors about the discriminatory conduct (e.g., post mortem to discuss lessons ]]	X			Yes
						Page 18

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Complianc Indicator		re Has 1 Met		For all unmet measures, provide a	
Measures	C.6. The EEO office advises managers/supervisors on EEO matters.  Measures	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
C.6.a. Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If "yes", please identify the frequency of the EEO updates in the comments column.					Yes
C.6.b. Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I]					Yes

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		Essential Element: D Proactive Prevention					
<b></b>	Compliance Indicator		Measure Has Been Met m				
+	Measures	D.1. The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report	
D.1.a. Do I]	es the agency have	a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec.	X			Yes	
D.1.b. Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; and/or external special interest groups? [see MD-715]  Instructions, Sec. I]						Yes	
D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]					Yes		
<b></b>	Compliance Indicator		Measure Has Been Met			For all unmet measures, provide	
•	Measures	D.2. The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report	
	D.2.a. Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]					Yes	
D.2.b. Do practices	D.2.b. Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]					Yes	
D.2.c. Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a) (3)]						Yes	
D.2.d. Does the agency regularly review the following sources of information to find barriers: complaint/ grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, and/or external special interest groups? [see MD-715 Instructions, Sec. I]] If "yes", please identify the data sources in the comments column.						Yes	

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Compliance Indicator		Measure Has Been Met			For all unmet measures, provide
Measures	D.3. The agency establishes appropriate action plans to remove identified barriers.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
D.3.a. Does the agency effect procedures, or practices? [see	tively tailor action plans to address the identified barriers, in particular policies, e 29 CFR §1614.102(a)(3)]	X			Yes
	D.3.b. If the agency identified one or more barriers during the reporting period, did the agency implement a plan X in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]				
D.3.c. Does the agency perio	dically review the effectiveness of the plans? [see MD-715, II(D)]	X Yes			Yes
Compliance Indicator		Measure Has Been Met			For all unmet measures, provide
Measures	D.4. The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.		X			Yes
D.4.b. Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR §1614.203(d)(1)(i)]		X			Yes
	D.4.c. Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR §1614.203(d)(1)(ii)(A)]				Yes
D.4.d. Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR §1614.203(d)(7) (ii)]					Yes

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Compliance Indicator  E.1. The agency maintains an efficient, fair, and impartial complaint resolution process.  Yes No N/A  Wesures  No N/A  N/A  E.1. The agency maintains an efficient, fair, and impartial complaint resolution process.  Yes No N/A  E.1. The agency maintains an efficient, fair, and impartial complaint resolution attach an EEOC FOR 715-01 PART H to agency's stature report  E.1.a. Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?  X Yes
Measures  E.1. The agency maintains an efficient, fair, and impartial complaint resolution process.  Yes No N/A  N/A  Wes No N/A  The space below complete and attach an EEOC FOR 715-01 PART H to agency's statureport  E.1.a. Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?  X Yes
<b>1</b>
E.1.b. Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?
E.1.c. Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?
E.1.d. Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments.
E.1.e. Does the agency ensure that all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?
E.1.f. Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?
E.1.g. If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?
E.1.h. When the complainant did not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?
E.1.i. Does the agency timely issue final actions following receipt of the hearing file and the administrative X judge's decision, pursuant to 29 CFR §1614.110(a)?
E.1.j. If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comments column.
E.1.k. If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]
E.1.I. Does the agency submit complaint files and other documents in the proper format to EEOC through the Yes Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]

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Compliance Indicator					For all unmet measures, provide a	
Measures	E.2. The agency has a neutral EEO process.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report	
	shed a clear separation between its EEO complaint program and its defensive 1(IV)(D)] If "yes", please explain.	X			Yes	
separate from the agency rep	ifficiency reviews, does the EEO office have access to sufficient legal resources resentative? [see MD-110, Ch. 1(IV)(D)] If "yes", please identify the source/conducts the legal sufficiency review in the comments column.	X			Yes	
	s on the agency's defensive function to conduct the legal sufficiency review, is reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]	X			Yes	
E.2.d. Does the agency ensurinvestigations, and final ager	2.d. Does the agency ensure that its agency representative does not intrude upon EEO counseling, vestigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]					
E.2.e. If applicable, are processing of complaints? [se	.2.e. If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely rocessing of complaints? [see EEOC Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004)]					
Compliance Indicator			re Has Met	For all unmet measures, provide		
Measures	E.3. The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report	
E.3.a. Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]		X			Yes	
E.3.b. Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]					Yes	
E.3.c. Does the Agency encourage all employees to use ADR, where ADR is appropriate? [See MD-110, Ch. 3(IV)(C)]					Yes	
E.3.d. Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]					Yes	
E.3.e. Does the agency prohi settlement authority? [see M	bit the responsible management official named in the dispute from having D-110, Ch. 3(I)]	X			Yes	
E.3.f. Does the agency annua	ally evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	X			Yes	

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1	Compliance Indicator		Measure Has Been Met  Yes No N/A		For all unmet measures, provide	
•	Measures	E.4. The agency has effective and accurate data collection systems in place to evaluate its EEO program.			brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report	
E.4.a. Do	es the agency have	systems in place to accurately collect, monitor, and analyze the following data:				
		ncluding the issues and bases of the complaints, the aggrieved individuals/ed management official? [see MD-715, II(E)]	X			Yes
E.4.a.2. T	he race, national or	igin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	X			Yes
E.4.a.3. R	Recruitment activitie	s? [see MD-715, II(E)]	X			Yes
	external and internal status? [see MD-71	applicant flow data concerning the applicants' race, national origin, sex, and 5, $\Pi(E)$	X			Yes
E.4.a.5. T	E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]					Yes
	E.4.a.6. The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]					Yes
	.4.b. Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 X structions, Sec. I]		Yes			
1	Compliance Indicator		Measure Has Been Met		For all unmet measures, provide	
	Measures	E.5. The agency identifies and disseminates significant trends and best practices in its EEO program.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
E.5.a. Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If "yes", provide an example in the comments.			X			Yes
		w other agencies' best practices and adopt them, where appropriate, to improve the gram? [see MD-715, II(E)] If "yes", provide an example in the comments.	X			Yes
	es the agency comp 715, II(E)]	are its performance in the EEO process to other federal agencies of similar size?	X			Yes

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	ompliance dicator		ıre Has n Met		For all unmet measures, provide a	
<b>♣</b> Me	easures	F.1. The agency has processes in place to ensure timely and full compliance with EEOC orders and settlement agreements.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
		a system of management controls to ensure that its officials timely comply with final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	X			Yes
F.1.b. Does the compliance wi	e agency have a ith resolutions/s	a system of management controls to ensure the timely, accurate, and complete settlement agreements? [see MD-715, II(F)]		X		Payroll is handled by Defense Finance Accounting Service (DFAS)
F.1.c. Are ther [see MD-715,		n place to ensure the timely and predictable processing of ordered monetary relief?	X			Yes
F.1.d. Are prod	e to process other forms of ordered relief promptly? [see MD-715, II(F)]	X			Yes	
F.1.e. When E officer(s) acco	EOC issues an ountable for poo	order requiring compliance by the agency, does the agency hold its compliance or work product and/or delays during performance review? [see MD-110, Ch. 9(IX)	X			Yes
	ompliance dicator					For all unmet measures, provide
Me	easures	F.2. The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Yes	No	N/A	brief explanation in the space below of complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
	e agency timely	y respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715,	X			Yes
		requests a hearing, does the agency timely forward the investigative file to the fice? [see 29 CFR §1614.108(g)]	X			Yes
II(E)] F.2.a.1. When		11ce: [see 29 CFK §1014.108(g)]		1	Ī	Yes
II(E)] F.2.a.1. When appropriate EE F.2.a.2. When	EOC hearing of there is a findi	ng of discrimination that is not the subject of an appeal by the agency, does the ance with the orders of relief? [see 29 CFR §1614.501]	X			
F.2.a.1. When appropriate EF F.2.a.2. When agency ensure F.2.a.3. When	EOC hearing of there is a findi- timely compliana a complainant	ng of discrimination that is not the subject of an appeal by the agency, does the	X			Yes

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#### **Agency Self-Assessment Checklist**

	Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a
+	Measures	F.3. The agency reports to EEOC its program efforts and accomplishments.  Measures	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
F.3.a. Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]			X			Yes
F.3.b. Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]			X			Yes

#### Essential Element: O Other

EEOC FORM
715-02
PART H

Deficiency:

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	Plan to Atta	in Essenti	al Elements			
PART H.1						
Brief Description of Program	A.2.a.2. Reasonable accommodation procedur	es? [see 29	CFR § 1614.203(d)(3)]			

To obtain data and conduct trend analysis of the effects of management/ personnel policies, procedures, and practices on R/NO/G and disability groups. WHS conducted and will continue to conduct a 5-year trend analysis of RGNO data (see Executive Summary, Workforce Analysis). Additionally, for FY 2019, WHS will conduct the 5-year trend for senior grades and disability employment.

EEOC FORM
715-02
PART H

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#### Plan to Attain Essential Elements

#### PART H.2

Brief Description of Program Deficiency:

A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]

WHS does not have access to sufficient applicant flow data to conduct thorough barrier analysis. WHS does not have sufficient form response rates to monitor and ensure that the data received is accurate, received timely, and contains all the required data elements for submitting annual reports to the WHS. Created a new database to present candidates to offices in November of 2019. Also created new application form for Special Employment Programs in November 2019. Other efforts at the time left too little time remaining before use of the application form needed to go into use. Will make relatively minor adjustments to form as part of other lessons learned. Data from forms will then be able to be entered into databases and tracked along with candidates, themselves.

EEOC FORM
715-02
PART H

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#### Plan to Attain Essential Elements

#### PART H.3

Brief Description of Program Deficiency:

A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]

The Agency does not complete investigations within the prescribed time frame. In FY19, complaints processing time increased by 35 percent as compared to FY16 from 179 days to 242 days. On average, WHS processed seven FADs per year between FY 2012 and FY 2017, ranging from four in FY 2017 to 12 in FY 2013. There was a total of ten (10) FADs issued with an average of 58.3 days to issuance for FY2019 and 46 days for FY2018. The plan going forward, to ensure compliance with the FAD timeline requirements, will continue with two dedicated staff members, one being the Director, as FAD writers as competencies improve with experience.

EEOC FORM
715-02
PART H

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#### Plan to Attain Essential Elements

#### PART H.4

Brief Description of Program Deficiency:

A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]

WHS does not track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD 715 standards. Created a new database to present candidates to offices in November of 2019. Also created new application form for Special Employment Programs in November 2019. Other efforts at the time left too little time remaining before use of the application form needed to go into use. Will make relatively minor adjustments to form as part of other lessons learned. Data from forms will then be able to be entered into databases and tracked along with candidates, themselves.

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	A min to Summing Additions								
C	PART I.1								
Source of the		Workforce Data (if so identify the table)							
Specific Work Table:	Morce Data	Workforce Data Table - A1							
STATEMENT CONDITION A TRIGGER POTENTIAL	THAT WAS FOR A	WHS identified these triggers by analyzing various MD-715 data tables (A1, A4-1, A6, A8, A-9, A-10A-12, & A14). Hispanic males and females are not hired at rates matching their availability in the NCLF. They are also below the occupational CLF in several job series.							
Provide a brief describing the issue.									
How was the corecognized as a barrier?									
STATEMENT		Barrier Group	)						
BARRIER G	ROUPS:	Hispanic or Latino Males Hispanic or Latino Females							
Barrier Analy Completed?:	sis Process	Υ							
Barrier(s) Ide	ntified?:	Υ							
STATEMENT		Barrie	r Name	Description of Policy, Procedure, or Practice					
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.		Hiring		A4-1, A6, A8 hired at rates	WHS identified these triggers by analyzing various MD-715 data tables (A1A4-1, A6, A8, A-9, A-10A-12, & A14). Hispanic males and females are not nired at rates matching their availability in the NCLF. They are also below to occupational CLF in several job series.				
			Objective	(s) and Date	s for EEO Plan				
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description				
09/30/2019	09/30/2019	Yes			Utilize DefenseReady as a mechanism to track information on Agency vacancies, to include recruitment as available				
09/30/2019	09/30/2019	Yes			Analyze separation data to evaluate and explore the correlation between length of service and separation				
	Responsible Official(s)								
	Title			Name		Standards Address The Plan?			
Director, Offi Opportunity I	ce of Equal Er Program	mployment	Pamela R. Sullivan, Director, Office of Equal Employment						

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Planned Activities Toward Completion of Objective									
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date					
09/30/2019	The CAMS: •provide feedback to HRD about operations of their assigned customers; •assist customers with determining alternative methods to increase the success of the office's programs through utilization of special appointment authorities (e.g. Student Education Employment Program, Temporary Summer Hire Authority, Presidential Management Intern (PMI) authority); •partner with customers and DDR on opportunities for recruitment and advancement of employees with targeted disabilities, to include Hispanic/Latinos; and •assist customers with developing customer-specific, office-specific, and occupation-specific hiring from the Hispanic/Latino community.	Yes							
	Report of Accomplishments	<b>;</b>							
Fiscal Year	Fiscal Year Accomplishments								
2018	HRD provides periodic updates to leadership and the workforce on the recruitment and employment of Hispanics/Latinos. Also, consistent with the WHS Targeted Recruitment Plan, HRD provides feedback about current office operations with the goal of determining alternative methods to increase the success of the office's programs. The Plan is based on participation and efforts of WHS leadership, directorates and offices, and the HRD Recruitment and Outreach specialists. HRD requested that each office assign a representative to partner with the recruitment and outreach specialists. In 2016, HRD established Customer Account Managers (CAMS) to serve as liaisons between HRD and the customer.								

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				PART I.2						
Source of the Tr	viagov.	Workforco Do	nta (if so ident							
Source of the Tr		Workforce Data (if so identify the table)  Workforce Data Table - A1								
Specific Workfortable:	orce Data									
STATEMENT ( CONDITION T A TRIGGER FO POTENTIAL B	HAT WAS OR A	WHS permanent workforce data (Table A1) reflects a low representation rate for females (35.3%) compared to their availability in the NCLF (48.1%). Specifically, White females (18.63%) are below the NCLF (34.03%).								
Provide a brief nadescribing the colissue.										
How was the con recognized as a p barrier?										
STATEMENT (		Barrier Group	)							
BARRIER GRO	OUPS:	All Women								
Barrier Analysis Completed?:	s Process	Υ								
Barrier(s) Ident	ified?:	Υ								
STATEMENT (		Barrier Name Description				on of Policy, Procedure, or Practice				
IDENTIFIED B	SARRIER:	Recruitment While WHS does conduct								
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.				percentage of their ratio in WHS will als	the NCLF.			that the applican in 2018.	t rate is closer to	
	•		Objective	(s) and Date:	s for EEO I	Plan				
Date T Initiated	arget Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description					
03/10/2009 0	9/30/2019	Yes			Recruitment efforts will target qualified Females. WHS will also attempt to obtain more information on the reasons for separations.					
			Re	sponsible Of	fficial(s)					
Title				Name Standards Address T			The Plan?			
Director, HRD		Christopher Kapellas			Yes					
Planned Activities Toward Completion of Objective										
Target Date		Planned Activities				Sta	fficient ffing & nding?	Modified Date	Completion Date	
09/30/2019	Implement applicant f	the recruitme low data.	nt plan and m	nonitor results	via		Yes			

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Report of Accomplishments								
Fiscal Year	Accomplishments							
2018	A comprehensive recruitment plan consists of strategies targeted for hiring of Females. Part of the strategy will be to establish a rapport and partnerships with Women's and Veterans' organizations/associations, networking events as well as identify methods to attract, train and retain Females to the Agency. WHS anticipates hosting a seminar in conjunction with OPM to explore pathways for women to attain senior executive status and employment.							

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Plan to Eliminate Identified Barriers										
				PART I.3	3					
Source of the	Trigger:	Workforce Data (if so identify the table)								
Specific Work Table:	xforce Data	Workforce Data Table - A4								
STATEMEN' CONDITION A TRIGGER POTENTIAL	THAT WAS FOR A	The Table A4-2 was analyzed. Each group's participation rate in each pay level was compared to the ratio of the total workforce in that pay level. The above discrepancies were noted.								
Provide a brief describing the issue.										
How was the crecognized as barrier?										
STATEMEN'		Barrier Group	ŋ							
BARRIER GROUPS:		Hispanic or Latino Males Hispanic or Latino Females Black or African American Males Black or African American Females								
Barrier Analy Completed?:	ysis Process	Y								
Barrier(s) Ide	entified?:	Υ								
STATEMEN		Barrier Name Description of Policy, Procedure, or Practice								
Provide a succinct statement of the agency policy,		Internal Selection  There is a need to compile relevant data and perform detailed analysis on potential barriers from the GS 13 to SES (e.g., internal selection data and applicant flow data).								
procedure or practice that has been determined to be the barrier of the undesired condition.										
			Objective	(s) and Date	s for EEO P	lan				
Date Initiated	Target Date									
03/10/2009	09/30/2019	Yes			WHS will continue to examine workforce data and collect feedback fr					
			Re	sponsible O	fficial(s)					
	Title	Name								
Director, HR	D	Christopher Kapellas				Yes				
Planned Activities Toward Completion of Objective										
Target Date		Planned Activities				Suf Stat	ficient ffing & iding?	Modified Date	Completion Date	
09/30/2019	9 Establish	Special Reten	tion Programs	(SRPs)		`	Yes			

#### U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

DOD Office of the Secretary/Washington Headquarters Services

For period covering October 1, 2019 to September 30, 2020

Planned Activities Toward Completion of Objective										
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date						
12/31/2019	Align Special Retention Programs (SRPs) with WHS and Supported Organization Goals	Yes								
Report of Accomplishments										
Fiscal Year	Accomplishments									
2012	Similar to how Special Employment Programs incentivize potential new talent to join WHS-supported organizations, Special Retention Programs can incentivize existing talent to remain. WHS efforts along these line improve overall diversity efforts, though for the purpose of this recruiting strategy, efforts ensure a more robust internal source of candidates to recruit for openings. Efforts to create these programs will begin in the late summer of 2019,									
	targeting groups with lower retention and representation at higher rank	S								