

EEOC FORM 715-01 PART A - D	<i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
For period covering October 1, 2013 to September 30, 2014				
PART A Department or Agency Identifying Information	1. Agency		1. Washington Headquarters Services (WHS) and WHS serviced components	
	1.a. 2 nd level reporting component		N/A	
	1.b. 3 rd level reporting component			
	1.c. 4 th level reporting component			
	2. Address		2. 1155 Defense Pentagon	
	3. City, State, Zip Code		3. Washington, DC 20301-1155	
	4. CPDF Code	5. FIPS code(s)	4. DD21	5. 8840
PART B Total Employment	1. Enter total number of permanent full-time and part-time employees			1. 6,375
	2. Enter total number of temporary employees			2. 757
	3. Enter total number employees paid from non-appropriated funds			3. 0
	4. TOTAL EMPLOYMENT [add lines B 1 through 3]			4. 7,132
ART C Agency Official(s) Responsible For Oversight of EEO Program(s)	1. Head of Agency Official Title		Michael L. Rhodes, Acting Director, Washington Headquarters Services	
	2. Agency Head Designee		N/A	
	3. Principal EEO Director/Official Official Title/series/grade		Michael L. Rhodes, Director for Administration, Office of the Deputy Chief Management Officer	
	4. EEO Director		Beatrice Pacheco, Director, Office of Equal Employment Opportunity and Diversity (EEOD)	
	5. Affirmative EEO Program Official		Vacant, Deputy Director, Affirmative Employment and Diversity Programs, EEOD	
	6. Section 501 Affirmative Action Program Official		Vacant, Deputy Director, Affirmative Employment and Diversity Programs, EEOD	
	7. Complaint Processing Program Manager		Pamela R. Sullivan, Deputy Director, Complaints and Adjudication Programs, Office of Equal Employment Opportunity and Diversity	

EEOC FORM 715-01 PART A - D	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT		
PART D List of Subordinate Components Covered in This Report	Subordinate Component and Location (City/State)	CPDF and FIPS codes	
	Office of the Secretary of Defense (OSD), Arlington, VA	DD01	8840
	Joint Staff, Arlington, VA	DD02	8840
	Defense Test Resources Management Center (DTRMC), Arlington, VA	DD68	8840
	Defense Legal Services Agency (DLSA), Arlington, VA	DD25	8840
	Defense Security Cooperation Agency (DSCA), Arlington, VA	DD06	8840
	Office of Economic Adjustment (OEA), Arlington, VA	DD23	8840
	Pentagon Force Protection Agency (PFPA), Arlington, VA	DD65	8840
	U.S. Court of Appeals for the Armed Forces (USCAAF)	DD08	8840
	Defense Prisoner of War/Missing Personnel Office (DPMO), Arlington, VA	DD58	8840
	Defense Technology Security Administration (DTSA), Alexandria, VA	DD29	8840
EEOC FORMS and Documents Included With This Report			
*Executive Summary [FORM 715-01 PART E], that includes:		*Optional Annual Self-Assessment Checklist Against Essential Elements [FORM 715-01PART G]	X
Brief paragraph describing the agency's mission and mission-related functions	X	*EEO Plan To Attain the Essential Elements of a Model EEO Program [FORM 715-01PART H] for each programmatic essential element requiring improvement	X
Summary of results of agency's annual self-assessment against MD-715 "Essential Elements"	X	*EEO Plan To Eliminate Identified Barrier [FORM 715-01 PART I] for each identified barrier	X
Summary of Analysis of Work Force Profiles including net change analysis and comparison to RCLF	X	*Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals With Targeted Disabilities for agencies with 1,000 or more employees [FORM 715-01 PART J]	X
Summary of EEO Plan objectives planned to eliminate identified barriers or correct program deficiencies	X	*Copy of Workforce Data Tables as necessary to support Executive Summary and/or EEO Plans	X
Summary of EEO Plan action items implemented or accomplished	X	*Copy of data from 462 Report as necessary to support action items related to Complaint Processing Program deficiencies, ADR effectiveness, or other compliance issues	X
*Statement of Establishment of Continuing Equal Employment Opportunity Programs [FORM 715-01 PART F]	X	*Copy of Facility Accessibility Survey results as necessary to support EEO Action Plan for building renovation projects	X
*Copies of relevant EEO Policy Statement(s) and/or excerpts from revisions made to EEO Policy Statements	X	*Organizational Chart	X

EXECUTIVE SUMMARY

Introduction

Washington Headquarters Services (WHS) is the essential services provider for the Office of the Secretary of Defense (OSD), and Department of Defense (DoD) agencies, and offices in the National Capital Region. WHS delivers essential administrative services to assist these components and offices in fulfilling the mission of DoD. Under the leadership of Director William E. Brazis, WHS has developed and implemented several new initiatives and completed prior year initiatives supporting 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 all components serviced by WHS.

Model EEO Program Status

During FY 2014, WHS addressed several EEO program deficiencies reported in prior years. The agency was able to answer 100 self-assessment questions affirmatively for a success rate of 87%, compared to 79% in FY 2013 (94 affirmative responses). Part H of this report contains WHS planned activities to reach compliance on the remaining program deficiencies. The following FY 2014 accomplishments are grouped under the six essential elements to achieving a model EEO program.

Demonstrated Commitment from Agency Leadership:

- The Director, WHS, continues to discuss affirmative employment and diversity issues at his monthly senior staff meetings.
- Managers and supervisors received training in the newly issued procedures for providing reasonable accommodation.

Integration of EEO Into the Agency's Strategic Mission:

- The Director, EEOD, attends Leadership Council meetings.
- The Director, EEOD, is present at agency deliberations prior to decisions regarding recruitment strategies, vacancy projections, etc.
- EEOD analyzes demographic data before a reorganization to determine if there would be a negative impact on one or more EEO groups.
- EEOD was able to fill four vacancies and is staffed to conduct barrier analysis.

Management and Program Accountability:

- The Director, EEOD, continues to provide semi-annual EEO updates to senior leadership.
- WHS continues to have no findings of discrimination.

Proactive Prevention:

- A 16-hour Senior Executive Diversity Seminar has been offered yearly since 2012. All Senior Executive Service (SES) personnel are required, as part of the seminar, to develop action plans to address identified barriers. Several plans have been developed.
- EEOD conducted a five (5) year trend analysis of the on board workforce distribution, new hires, major occupations, pay distribution, and separations.

Efficiency:

- All requests for reasonable accommodation were processed within the 30 day time frame.
- EEOD was able to obtain applicant flow data and identify areas needing additional focus.

Responsiveness and Legal Compliance:

- WHS continues to have no deficiencies in this area.

Workforce Composition

By the end of FY 2014, the total WHS and serviced components' total workforce (permanent and temporary) decreased from 7,159 to 7,132, representing a small negative net change of 0.4%. Workforce ratios by Race/Ethnicity/Gender are compared to the group's ratio in the National Civilian Labor Force (NCLF) census data to determine if a group has a low representation rate.

In the permanent workforce, Hispanics, White women, Asians, and American Indian/Alaskan Natives have a low participation rate, compared to their ratio in the NCLF (Table A-1).

- Hispanic men are at 50% of the NCLF. (2.6% versus 5.17%) They were at 1.20% at the end of FY 2013.
- Hispanic women are at 23% of the NCLF. (1.1% versus 4.79%) They were 0.52% at the end of FY 2013.
- White women are at 56% of the NCLF. (19.1% versus 34.03%) They were 20.49% at the end of FY 2013, so this is a decrease in FY 2014.
- Asian men are at 91.37% of the NCLF. (1.8% versus 1.97%) They were at 1.77% at the end of FY 2013.
- Asian women are at 51.81% of the NCLF. (1.0% versus 1.93%) They were at 1.13% at the end of FY 2013, so this is a decrease.
- American Indian men are at 36.36% of the NCLF. (0.2% versus 0.55%) They were at 0.27% at the end of FY 2013, so this is a decrease.
- American Indian women are at 18.87% of the NCLF. (0.1% versus 0.53%)

DoD has a goal of 2% for hiring individuals with targeted disabilities (deafness, blindness, partial paralysis, complete paralysis, missing extremities, epilepsy, severe intellectual disabilities, psychiatric disabilities, and dwarfism). DoD also has a goal that employees with targeted disabilities will be 2% of the work force.

- This group is now 0.5% of the total workforce of WHS and serviced components (25% of the two percent on board goal) compared to 0.42% on board at the end of FY 2013.
- Employees with reportable disabilities are now 6.4% of the workforce, compared to 5.75% at the end of FY 2013. (Table B-1)

Net Change Analysis

The net change for each group is compared to the net change for the total workforce to determine whether one or more groups is expanding at the same rate as the workforce (Table A-1).

Groups with low representation rates which experienced a negative net change greater than the net change for the total workforce were:

- White women (-2.2%)
- Asian Women (-4.9%)
- American Indian men (-21.1%)
- American Indian women (-14.3%)

New Hires

WHS and serviced components hired 387 permanent employees in FY 2014. For the Race/Ethnicity/Gender groups with low representation rates compared to their ratio in the NCLF, the hire rate was lower than their ratio in the NCLF (Table A-8).

- Hispanic men (3.36% vs 5.17%)
- Hispanic women (2.07% vs 4.79%)
- White women (21.29% vs 34.03%)
- Asian women (0.52% vs 1.93%)
- No American Indian/Alaskan Natives were hired. (0.55% and 0.53% of the NCLF)

Seven individuals with targeted disabilities were hired (1.2% of total hires). This is an improvement over FY 2013, when one person with a targeted disability was hired (Table B-8).

Pay Analysis

Some groups have a lower representation rate at the higher pay levels (Tables A&B 4-2):

- Hispanic men above GS-12
- Hispanic women above GS-13
- African American men above GS-12
- African American women above GS-13
- Employees with targeted disabilities above GS-12

Employee Separations

Of the 810 separations of permanent employees, 96% were voluntary (Tables A&B 14). Separation rates are compared to on board ratios from the beginning of the FY. Separation rates higher than on board rates are a trigger indicating the possibility of a barrier that needs to be identified and addressed. The voluntary separation rate for some groups with low representation rates was higher than their on board ratio.

- Hispanic women (1.4% v. 0.5% on board)
- White women (24.3% v. 19.8% on board)
- American Indian men (0.4% v. 0.2% on board)
- Employees with targeted disabilities (0.5% v. 0.44% on board)

Barrier Analysis

Applicant flow data for FY 2014 revealed that of the groups with low representation rates in WHS, Hispanics and White women are not applying at rates approaching their presence in the NCLF, indicating targeted recruitment is necessary. In addition, WHS will continue to recruit individuals with targeted disabilities.

The high separation rates will be examined, using the Nature of Action Codes and other data.

Part I of this report describes in detail the planned activities to address discrepancies in on board rates.

The Way Ahead

Leadership is committed to addressing barriers. The Human Resources Directorate is working with EEOD to create a recruitment plan focused on Hispanics, White women, and people with targeted disabilities. EEOD will also begin conducting site visits to the serviced components to share information and obtain insights to potential barriers to EEO. EEOD will continue to provide training in EEO, Alternative Dispute Resolution (ADR), Affirmative Employment, and Diversity and Inclusion.

**CERTIFICATION of ESTABLISHMENT of CONTINUING
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS**

I, Michael L. Rhodes, am the Principal EEO Director/Official for Washington Headquarters Services (WHS) and WHS serviced components.

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

The agency has also analyzed its work force 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 (Part I), 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.


 Michael L. Rhodes
 Director for Administration
 Office of the Deputy Chief Management Officer

2/2/15
 Date


 Michael L. Rhodes
 Acting Director, Washington Headquarters Services

2/2/15
 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, 2013 to September 30, 2014			
<p align="center">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.</p>					
 Compliance Indicator	 Measures	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
			Yes	No	
<p>The Agency Head was installed on 04/27/2010. The EEO policy statement was issued on 7/29/2010. Was the EEO policy statement issued within 6 - 9 months of the installation of the Agency Head? If no, provide an explanation.</p>			X		
<p>During the current Agency Head's tenure, has the EEO policy statement been re-issued annually? If no, provide an explanation.</p>			X		
<p>Are new employees provided a copy of the EEO policy statement during orientation?</p>			X		
<p>When an employee is promoted into the supervisory ranks, is s/he provided a copy of the EEO policy statement?</p>			X		
 Compliance Indicator	 Measures	EEO policy statements have been communicated to all employees.	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
			Yes	No	
<p>Have the heads of subordinate reporting components communicated support of all agency EEO policies through the ranks?</p>			X		
<p>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?</p>			X		
<p>Has the agency prominently posted such written materials in all personnel offices, EEO offices, and on the agency's internal website? [see 29 CFR §1614.102(b)(5)]</p>			X		
 Compliance Indicator	 Measures	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
			Yes	No	

Washington Headquarters Services		For period covering October 1, 2013 to September 30, 2014		
Are managers and supervisors evaluated on their commitment to agency EEO policies and principles, including their efforts to:				
resolve problems/disagreements and other conflicts in their respective work environments as they arise?			X	See Part H-1
address concerns, whether perceived or real, raised by employees and following-up with appropriate action to correct or eliminate tension in the workplace?			X	See Part H-1
support the agency's EEO program through allocation of mission personnel to participate in community out-reach and recruitment programs with private employers, public schools and universities?			X	See Part H-1
ensure full cooperation of employees under his/her supervision with EEO office officials such as EEO Counselors, EEO Investigators, etc.?			X	See Part H-1
ensure a workplace that is free from all forms of discrimination, harassment and retaliation?			X	See Part H-1
ensure that subordinate supervisors have effective managerial, communication and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications?			X	See Part H-1
ensure the provision of requested religious accommodations when such accommodations do not cause an undue hardship?			X	See Part H-1
ensure the provision of requested disability accommodations to qualified individuals with disabilities when such accommodations do not cause an undue hardship?			X	See Part H-1
Have all employees been informed about what behaviors are inappropriate in the workplace and that this behavior may result in disciplinary actions?		X		Publication of Administrative Instruction 8, Disciplinary and Adverse Actions (posted on WHS website)
Describe what means were utilized by the agency to so inform its workforce about the penalties for unacceptable behavior.				
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 supervisor been trained on their responsibilities under the procedures for reasonable accommodation?		X		See Part H-2
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.				
 Compliance Indicator	The reporting structure for the EEO Program provides the Principal EEO Official with appropriate authority and resources to effectively carry out a successful EEO Program.	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	

Washington Headquarters Services		For period covering October 1, 2013 to September 30, 2014		
Is the EEO Director under the direct supervision of the agency head? [see 29 CFR §1614.102(b)(4)] For subordinate level reporting components, is the EEO Director/Officer under the immediate supervision of the lower level component's head official? (For example, does the Regional EEO Officer report to the Regional Administrator?)		X		
Are the duties and responsibilities of EEO officials clearly defined?		X		
Do the EEO officials have the knowledge, skills, and abilities to carry out the duties and responsibilities of their positions?		X		
If the agency has 2 nd level reporting components, are there organizational charts that clearly define the reporting structure for EEO programs?				N/A
If the agency has 2 nd level reporting components, does the agency-wide EEO Director have authority for the EEO programs within the subordinate reporting components?				N/A
If not, please describe how EEO program authority is delegated to subordinate reporting components.				
 Compliance Indicator	The EEO Director and other EEO professional staff responsible for EEO programs have regular and effective means of informing the agency head and senior management officials of the status of EEO programs and are involved in, and consulted on, management/personnel actions.	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	
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?		X		
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?		X		
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		See Part H-3
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 re-alignments?		X		See Part H-3
Are management/personnel policies, procedures and practices examined at regular intervals to assess whether there are hidden impediments to the realization of equality of opportunity for any group(s) of employees or applicants? [see 29 C.F.R. § 1614.102(b)(3)]		X		See Part H-8
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?		X		

Washington Headquarters Services		For period covering October 1, 2013 to September 30, 2014		
 Compliance Indicator	The agency has committed sufficient human resources and budget allocations to its EEO programs to ensure successful operation.	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	
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		See Part H-4
Are statutory/regulatory EEO related Special Emphasis Programs sufficiently staffed?		X		Collateral Duty See Part H-5
Federal Women's Program - 5 U.S.C. 7201; 38 U.S.C. 4214; Title 5 CFR, Subpart B, 720.204		X		Collateral Duty See Part H-5
Hispanic Employment Program - Title 5 CFR, Subpart B, 720.204		X		Collateral Duty See Part H-5
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 EEO Office.
 Compliance Indicator	The agency has committed sufficient budget to support the success of its EEO Programs.	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	
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?		X		
Is there sufficient budget allocated to all employees to utilize, when desired, all EEO programs, including the complaint processing program and ADR, and to make a request for reasonable accommodation? (Including subordinate level reporting components?)		X		
Has funding been secured for publication and distribution of EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures, etc.)?		X		

Washington Headquarters Services		For period covering October 1, 2013 to September 30, 2014		
Is there a central fund or other mechanism for funding supplies, equipment and services necessary to provide disability accommodations?		X		
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?		X		See Part H-6
Is there sufficient funding to ensure the prominent posting of written materials in all personnel and EEO offices? [see 29 C.F.R. § 1614.102(b)(5)]		X		
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 of EEO programs within each manager's or supervisor's area or responsibility.	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	
Are regular (monthly/quarterly/semi-annually) EEO updates provided to management/supervisory officials by EEO program officials?		X		
Do EEO program officials coordinate the development and implementation of EEO Plans with all appropriate agency managers to include Agency Counsel, Human Resource Officials, Finance, and the Chief information Officer?		X		

Washington Headquarters Services		For period covering October 1, 2013 to September 30, 2014		
 Compliance Indicator	The Human Resources Director and the EEO Director meet regularly to assess whether personnel	Measure has been		For all unmet measures, provide a brief explanation

	programs, policies, and procedures are in conformity with instructions contained in EEOC management directives. [see 29 CFR § 1614.102(b)(3)]	met		in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
Have time-tables 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		See Part H-8
Have time-tables 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		See Part H-8
Have time-tables or schedules been established for the agency to review its Employee Development/Training Programs for systemic barriers that may be impeding full participation in training opportunities by all groups?		X		See Part H-8
 Compliance Indicator	When findings of discrimination are made, the agency explores whether or not disciplinary actions should be taken.	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	
Does the agency have a disciplinary policy and/or a table of penalties that covers employees found to have committed discrimination?		X		
Have all employees, supervisors, and managers been informed as to the penalties for being found to perpetrate discriminatory behavior or for taking personnel actions based upon a prohibited basis?		X		
Has the agency, when appropriate, disciplined or sanctioned managers/supervisors or employees found to have discriminated over the past two years?				N/A – No findings of discrimination
If so, cite number found to have discriminated and list penalty /disciplinary action for each type of violation.				
Does the agency promptly (within the established time frame) comply with EEOC, Merit Systems Protection Board, Federal Labor Relations Authority, labor arbitrators, and District Court orders?		X		
Does the agency review disability accommodation decisions/actions to ensure compliance with its written procedures and analyze the information tracked for trends, problems, etc.?		X		
Essential Element D: PROACTIVE PREVENTION Requires that the agency head makes early efforts to prevent discriminatory actions and eliminate barriers to equal employment opportunity in the workplace.				
 Compliance Indicator	Analyses to identify and remove unnecessary barriers to employment are conducted throughout the year.	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	
Washington Headquarters Services		For period covering October 1, 2013 to September 30, 2014		
Do senior managers meet with and assist the EEO Director and/or other EEO Program Officials in the identification of barriers that may be impeding the		X		

realization of equal employment opportunity?				
When barriers are identified, do senior managers develop and implement, with the assistance of the agency EEO office, agency EEO Action Plans to eliminate said barriers?		X		See Part H-7
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		
Are trends analyses of the workforce's grade level distribution conducted by race, 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	See Part H-8
 Compliance Indicator	The use of Alternative Dispute Resolution (ADR) is encouraged by senior 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		Yes	No	
Are all employees encouraged to use ADR?		X		
Is the participation of supervisors and managers in the ADR process required?			X	Part H-9
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 elimination of identified barriers.	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	
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 system that permits tracking of the information required by MD-715 and these instructions?		X		See Part H-10
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.

Washington Headquarters Services		For period covering October 1, 2013 to September 30, 2014		
Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations in all major components of the agency?		X		
Are 90% of accommodation requests processed within the time frame set forth in the agency procedures for reasonable accommodation?		X		See Part H-11
 Compliance Indicator	The agency has an effective complaint tracking and monitoring system in place to increase the effectiveness of the agency's EEO Programs.	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	
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		
<p>If yes, briefly describe how: The Statement of Work in the contract provides stipulations for quality assurance to ensure payment upon adequate completion of work to be performed. IRD monitors investigations; EEOD monitors counselors to ensure timely compliance.</p>				
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		
Does the agency monitor and ensure that experienced counselors, investigators, including contract and collateral duty investigators, receive the 8 hours of refresher training required on an annual basis in accordance with EEO Management Directive MD-110?		X		
 Compliance Indicator	The agency has sufficient staffing, funding and authority to comply with the time frames in accordance with the EEOC (29 C.F.R. Part 1614) regulations for processing EEO complaints of employment discrimination.	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	
Are benchmarks in place that compare the agency's discrimination complaint 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		
Does the agency complete the investigations within the applicable prescribed time frame?			X	See Part H-12

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When a complainant requests a final agency decision, does the agency issue the decision within 60 days of the request?			X	See Part H-12
When a complainant requests a hearing, does the agency immediately upon receipt of the request from the EEOC AJ forward the investigative 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		
Does the agency ensure timely compliance with EEOC AJ decisions which are not the subject of an appeal by the agency?		X		
 Compliance Indicator	There is an efficient and fair dispute resolution process and effective systems for evaluating the impact and effectiveness of the agency's EEO complaint processing program.	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	
In accordance with 29 C.F.R. §1614.102(b), has the agency established an ADR Program during the pre-complaint and formal complaint stages of the EEO process?		X		
Does the agency require all managers and supervisors to receive ADR training in accordance with EEOC (29 C.F.R. Part 1614) regulations, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR?		X		
After the agency has offered ADR and the complainant has elected to participate in ADR, are the managers required to participate?			X	See Part H-9
Does the responsible management official directly involved in the dispute have settlement authority?		X		Generally. Will depend on the nature of the dispute.
 Compliance Indicator	The agency has effective systems in place for maintaining and evaluating the impact and effectiveness of its EEO programs.	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	
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?		X		
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	See Part H-10
Do the agency's EEO programs address all of the laws enforced by the EEOC?		X		

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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		See Part H-13
Does the agency track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD-715 standards?			X	See Part H-14
Does the agency consult with other agencies of similar size on the effectiveness of their EEO programs to identify best practices and share ideas?		X		
 Compliance Indicator	The agency ensures that the investigation and adjudication function of its complaint resolution process are separate from its legal defense arm of agency or other offices with conflicting or competing interests.	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	
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 EEOC Administrative Judges.	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	
Does the agency have a system of management control to ensure that agency officials timely comply with any orders or directives issued by EEOC Administrative Judges?		X		
 Compliance Indicator	The agency's system of management controls ensures that the agency timely completes all ordered corrective action and submits its compliance report to EEOC within 30 days of such completion.	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	
Does the agency have control over the payroll processing function of the agency? If Yes, answer the two questions below.		X		

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Are there steps in place to guarantee responsive, timely, and predictable processing of ordered monetary relief?		X		
Are procedures in place to promptly process other forms of ordered relief?		X		
 Compliance Indicator	Agency personnel are accountable for the timely completion of actions required to comply with orders of EEOC.	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	
Is compliance with EEOC orders encompassed in the performance standards of any agency employees?		X		
If so, please identify the employees by title in the comments section, and state how performance is measured.		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		
If not, please identify the unit in which it is located, the number of employees in the unit, and their grade levels in the comments section.				
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 print-outs or payroll documents outlining gross back pay and interest, copy of any checks issued, narrative statement by an appropriate agency official of total monies paid?		X		
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		

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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		

Footnotes:

1. See 29 C.F.R. § 1614.102.

2. When an agency makes modifications to its procedures, the procedures must be resubmitted to the Commission. See *EEOC Policy Guidance on Executive Order 13164: Establishing Procedures to Facilitate the Provision of Reasonable Accommodation* (10/20/00), Question 28.