

EEOC FORM 715-01 PART A - D	<i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
<b>For period covering October 1, 2007 to September 30, 2008.</b>				
<b>PART A</b> Department or Agency Identifying Information	<b>1. Agency</b>		<b>1. Department of Defense</b>	
	1.a. 2 <sup>nd</sup> level reporting component		Department of the Navy	
	1.b. 3 <sup>rd</sup> level reporting component			
	1.c. 4 <sup>th</sup> level reporting component			
	<b>2. Address</b>		<b>2. Room 4E789, The Pentagon</b>	
	<b>3. City, State, Zip Code</b>		<b>3. Washington, DC 20350-1000</b>	
	4. CPDF Code	5. FIPS code(s)	4. NV	5. 95-2
<b>PART B</b> Total Employment	1. Enter total number of permanent full-time and part-time employees			1. 175,724
	2. Enter total number of temporary employees			2. 6,035
	3. Enter total number employees paid from non-appropriated funds			3. 42,632
	<b>4. TOTAL EMPLOYMENT [add lines B 1 through 3]</b>			4. 224,391
<b>PART C</b> Agency Official(s) Responsible For Oversight of EEO Program(s)	1. Head of Agency Official Title		<b>1. BJ Penn, Secretary of the Navy, Acting</b>	
	2. Agency Head Designee		<b>2.</b>	
	3. Principal EEO Director/Official Official Title/series/grade		<b>3. Harvey C. Barnum, Jr., Assistant Secretary of Navy (Manpower and Reserve Affairs), Acting</b>	
	4. Title VII Affirmative EEO Program Official		<b>4. Judith Scott, Program Director, Office of EEO and Diversity Management</b>	
	5. Section 501 Affirmative Action Program Official		<b>5. Sonya Long, Special Emphasis Program Manager</b>	
	6. Complaint Processing Program Manager		<b>6. Jamie Kajouras, Deputy Program Director, Office of EEO and Diversity Management</b>	
	7. Other Responsible EEO Staff		Arlene Black, EEO Program Management	
Edward Castellon, Complaints Management				
Judy Caniban, Complaints Management				
Andrew Peck, Complaints Management				

		Camellia Curtis, Lead, Final Agency Decision Team
		The Office of Civilian Human Resources Division Directors, Program Managers, and operating Service Center Directors are expected to address and incorporate EEO principles in the execution of their program responsibilities.

<b>EEOC FORM 715-01 PART A - D</b>	<b>U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>
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PART D List of Subordinate Components Covered in This Report	Subordinate Component and Location (City/State)	CPDF and FIPS codes	
		Naval Financial Office (NFO), Washington, DC	NV10
	Chief of Naval Operations (CNO), Washington, DC	NV11	95-2
	Assistant for Administration Office of the Under Secretary of the Navy (AA/USN), Washington, DC	NV12	95-2
	Office of Naval Research (ONR), Washington, DC	NV14	95-2
	Office of Naval Intelligence Command (ONI), Suitland, MD	NV15	95-2
	Bureau of Medicine (BUMED), Bethesda, MD	NV18	95-2
	Naval Air Systems Command (NAVAIR), Patuxent River, MD	NV19	95-2
	Bureau of Personnel (BUPERS), Millington, TN	NV22	95-2
	Naval Supply Systems Command (NAVSUP), Mechanicsburg, PA	NV23	95-2
	Naval Sea Systems Command (NAVSEA), Washington, DC	NV24	95-2
	Naval Facilities Engineering Command (NAVFAC), Washington, DC	NV25	95-2
	United States Marine Corps (MARCORPS), Quantico, VA	NV27	95-2
	Strategic Systems Programs Office (SPO), Washington, DC	NV30	95-2
	Commander, Space and Naval Warfare Systems (SPAWAR), San Diego, CA	NV39	95-2

	Naval Systems Management Activity (NSMA), Washington, DC	NV41	95-2
	Commander, Navy Installations Command (CNIC), Washington, DC	NV52	95-2
	Commander, U. S. Fleet Forces Command (FLTFRCS), Norfolk, VA	NV60	95-2
	Commander, Naval Forces Europe (NAVEUR), Washington, DC	NV61	95-2
	Commander, U. S. Pacific Fleet (PACFLT), San Diego, CA	NV70	95-2
	Commander Navy Reserve Force (NAVRES), Millington, TN	NV72	95-2
	Naval Special Warfare Systems (SPECWARS), Washington, DC	NV74	95-2
	Naval Education and Training Command (NETC), Pensacola, FL	NV76	95-2

EEOC FORMS and Documents Included With This Report

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

Department of the Navy

For period covering October 1, 2007 to September 30 2008

## EXECUTIVE SUMMARY

## The Mission of the Department of the Navy

The mission of the Department of the Navy (DON) is to maintain, train and equip combat-ready Naval forces capable of winning wars, deterring aggression and maintaining freedom of the seas. The DON has three principal components: the Navy Secretariat, consisting of executive offices mostly in Washington, D.C.; the Navy Fleet and Marine Corps operating forces and their reserve components, and, when directed by the President, the U.S. Coast Guard (a component of the Department of Homeland Security); and the shore establishment.

## EEO Program Overview

The annual assessment of the DON EEO Program was conducted at the end of the reporting period at all levels of the organization. Major commands submitted the results of their command-wide assessments which included input from subordinate activities with 500 or more employees. A DON review of the command assessments was accomplished and feedback will be provided to each command. Feedback provided on previous fiscal year report submissions has resulted in a noticeable improvement in the quality of major commands' assessment reports. In addition, on-site validation visits are conducted at select commands each reporting period to validate their responses to the EEOC Agency Self-Assessment Checklist and to conduct an assessment of the command's EEO Program. This has resulted in much more top-down focus and energy at the commands and a positive change in actions as well as outcomes. DON EEO Program strengths and weaknesses are described below.

- **Demonstrated Commitment from Agency Leadership**
  - **Strength:** DON senior leadership is briefed regularly on EEO Program status as well as issues impacting equality of opportunity. The Secretary of the Navy monitors progress on the employment of people with disabilities during his monthly review. The Force Management Oversight Council receives bi-annual briefs, while the Council's Deputies Program Roundtable gets monthly updates as well as the bi-annual briefs.
  - **Strength:** The updated DON Procedures for Processing Reasonable Accommodations were issued and once again made available to all employees via the DON Human Resources (HR) website.
  - **Weakness:** Command responses indicate that training on reasonable accommodation is not provided consistently within the DON.
- **Integration of EEO into the Agency's Strategic Mission**
  - **Strength:** In its ongoing efforts to implement the new DoD National Security Personnel System, the DON continued to provide much assistance to managers, supervisors and employees to ensure a fair, equitable and transparent transition to the new performance system. This included: development of a DON compensation

model with required training for managers and supervisors and regular weekly meetings with Pay Pool administrators.

- Strength: A training course entitled EEO for HR Professionals was developed and piloted. This course was well received by participants and after some minor tweaks will be available on a regular schedule to all DON HR professionals beginning in FY 2009.
- Strength: DON continues to build and reinforce collaborative relationships within the HR community. The first joint HR/EEO Conference was held on March 2008. This conference was a great success and this collaborative venture is now an annual event.
- Weakness: The inconsistent application of roles and responsibilities within the HR/EEO community has negatively impacted the effectiveness of the DON EEO program.
- Weakness: Additional training/guidance for EEO practitioners/supervisors/managers at the command and activity levels on EEO program requirements and roles/responsibilities is needed.
- **Management and Program Accountability**
  - Strength: As part of DON's continuing effort to bring more structure and accountability to the EEO Program, the head of each command was required to issue a memorandum announcing the start of the command's FY 2008 EEO program assessment and to identify roles and responsibilities for its accomplishment and the resultant status report.
  - Strength: Feedback and recommendations for improvement, if applicable, was provided to each command on their annual assessment efforts.
  - Weakness: Regular EEO updates are not provided consistently at the command/activity levels.
  - Weakness: Barrier analysis efforts at the command/activity levels need improvement.
- **Proactive Prevention**
  - Weakness: Supervisors/managers are not consistently involved with barrier analysis efforts at the command/activity levels.
- **Efficiency**
  - Strength: Due to the increased oversight of the pre-complaint process at the DON level, 76% of the EEO counselings were timely, an improvement of 13% when compared to the previous reporting period.
  - Strength: In addition to the documentary review of annual reports, DON conducted on-site visits to validate EEO programs efforts for some commands.
  - Weakness: Current data systems do not meet all requirements and all necessary tracking/monitoring systems have not been implemented.
- **Responsiveness and Legal Compliance**
  - Strength: Implemented an e-notification process to advise servicing EEO offices of appeal and compliance actions resulting in more timely submissions to EEOC OFO.

## **DON Work Force Profile**

At the end of the previous reporting period, DON reported a total civilian workforce of 188,720 that included permanent and temporary appropriated fund employees and a portion of the non-appropriated fund employees from the Navy Exchange Command (NEXCOM) only. Due to

improved reporting capabilities, at the end of FY 2008, the total DON civilian workforce of 224,391 includes permanent and temporary appropriated fund employees and all the non-appropriated employees, to include those at NEXCOM, U.S. Marine Corps (USMC) and Commander Naval Installations Command (CNIC). The FY 2008 Workforce Data Table A1 includes amended FY 2007 workforce data that accounts for the inclusion of all the non-appropriated fund (NAF) employees. As a result, the FY 2007 total civilian workforce has been changed to reflect the more accurate total of 214,774, vice 188,720 as previously reported.

The FY 2008 DON total civilian workforce of 224,391 represents a net change of 4.48% when compared to FY 2007. In FY 2008, there was a significant net increase of Hispanic males and females, 10.43% and 8.72% respectively. Likewise, there was a net change of 4.35% for White females and 12.28% for American Indian/Alaskan Native females. Although these groups experienced increases in their participation rates in the DON workforce, they continue to participate at a low level when compared to their representation in the National Civilian Labor Force (NCLF).

In comparison, the Asian population had a net change of -0.62% for Asian males and -15.12% for Asian females in FY 2008. Notwithstanding these decreases, the Asian male and female participation rates remain high when compared to the NCLF. Although Asian males and females enjoy a high participation rate in the DON overall workforce, in its December 22, 2008 letter to Secretary of the Navy, the Equal Employment Opportunity Commission provided a copy of the Asian American and Pacific Islander Work Group's findings that there appear to be barriers to full participation of Asian Americans and Pacific Islanders in the DON high grades and SES levels. A FY 2009 Part I, EEO Plan, was developed to address this issue.

Individuals with targeted disabilities (IWTD) experienced a net change of -19.5% at the end of FY 2008. Although the DON hired a larger number of IWTD in FY 2008 in comparison to FY 2007, IWTD continue to separate at a higher rate when compared to accessions. Commands will be tasked with the establishment of a Special Program and plan for the recruitment, hiring and advancement of IWTD in FY 2009, for execution in 2010 and maintained in the out years. Part J, Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals with Targeted Disabilities, reports the DON accomplishments for FY 2008 and strategies and activities for FY 2009 in more detail. *NOTE: The analysis of the IWTD workforce does not include NAF employees. Appropriated fund and NAF workforce information is maintained in two separate data systems. Although we were successful in obtaining NAF data to include Ethnicity and Race Information, we are still working to get accurate disability information for this segment of the DON workforce.*

## **Results of the FY 2008 Assessment**

This year's assessment indicates that DON continues to make progress toward meeting the Congressionally mandated goal of making the federal government a model workplace that is free of discrimination. DON's objective is to maintain and build on progress made to date while concurrently working to eliminate the remaining identified program deficiencies. However, as noted in the previous reporting period, there are issues that continue to date with the placement of most of the EEO program service providers in a consolidated, regional environment under the direction of one command. The command's financial and staffing issues are negatively impacting the effectiveness of program support provided to managers and supervisors in almost 78% of the department. This circumstance has hindered our ability to fully establish a model EEO program

and continues to be a focus of senior leadership for resolution.

Ongoing validation visits to Major Commands by the DON EEO Program Director and Deputy Director continue to have the desired results in obtaining commitment from senior leadership and increasing the accountability for all stakeholders in achieving a model EEO program. To raise DON's metric for success yet another notch, at the beginning of the current reporting period, the head of each command was required to issue a memorandum announcing the start of the command's FY 2008 annual EEO program assessment and to identify roles and responsibilities for its accomplishment and the resultant status report.

An analysis that compared the number of accessions for Individuals with Targeted Disabilities (IWTD) to their separation rate identified a continuing trend of a higher rate of separations for the last three fiscal years. The result is a net loss of IWTD each year and a progressively lower participation rate for IWTD from FY 2006 to the end of FY 2008. This trigger for a potential barrier is the single most consistent, significant issue across the entire DON organization. Planned actions to address this matter are described in the FY 2009 Plan of Action section. Results of a trend analyses for Hispanic males and females indicate a slight increase in their participation rates, both numerically and percentage wise, in the overall work force. Although the results of a trend analyses for White females indicate that they also realized a numerical increase in their overall participation rate, there was a slight dip in their percentage rate from FY 2007 to FY 2008. DON will continue to monitor these groups and ensure that in-depth barrier analysis at the appropriate levels of the organization is accomplished even though no specific planned activities for these groups were identified for execution in FY 2009.

## **FY 2009 Plan of Action**

FY 2009 Plans of Actions were developed following:

- A review of commands' self-assessment submissions
- The accomplishment of an Agency Self-Assessment
- A review of progress to date on FY 2008 Plans of Action
- The accomplishment of an analysis of the DON work force at the end of FY 2008
- Consideration of EEOC's comments related to the Asian American Pacific Islander Work Group's recommendations on a possible glass ceiling for high grade positions

### EEO Plan to Attain the Essential Elements of a Model EEO Program

- Planned activities to address the alignment of the DON EEO Program at all levels include:
  - Increased accountability through validation visits and scorecards;
  - Providing on-going EEO program training, guidance and communication to EEO practitioners and managers/supervisors;
  - Improving barrier analysis efforts at the command/activity levels and to ensure the involvement of supervisors/managers;
  - Enhancing current data systems and to develop necessary tracking/monitoring systems; and
  - Continuing to provide oversight and guidance for the processing of pre-complaints and formal complaints.
- Planned activities to address the issues resulting from the inconsistent application of roles

and responsibilities within the HR/EEO community include:

- Continuing to raise this matter to the appropriate levels to influence a positive outcome.
- Clarifying roles and responsibilities for HR/EEO service providers.
- Requiring impacted commands to develop alternative courses of action for implementing efforts to establish and maintain a model EEO program.

#### EEO Plans to Eliminate Identified Barrier

- Planned activities to address the continuing trend of a progressively lower overall participation rate for IWTD include:
  - Recruiting and filling a DON level PWD Program Manager position to manage this critical program;
  - Updating the DON version of PART J and requiring all commands to establish a Special Program and Plan for IWTD using this PART, with a specific emphasis on barrier analysis efforts;
  - Implementing an automated DON-wide tracking and monitoring system for reasonable accommodation requests;
  - Implementing a DON FEORP Program and Plan that includes recruitment strategies to ensure the diversity of applicant pools to include IWTD;
  - Sharing the results of IWTD pilot programs.
  - Marketing the EEOC's goal of a 2% participation rate of IWTD by 2010 as the DON Goal.
- Planned activities to address the trigger for a potential barrier of a glass ceiling for Asian/Pacific Islanders at the YA-3 (and equivalent) and higher level positions include:
  - Tasking commands to conduct a more in-depth barrier analysis into this issue, report their findings to DON and to develop EEO Plans, as needed, for execution in FY 2010.
  - Include information on this planned activity in regular EEO updates to senior leadership and supervisors/managers.

These EEO Plans implement our objective to incrementally raise the benchmark for assessing the success of the overall DON EEO Program each ensuing year. We further anticipate that the implementation of long-awaited corporate automated tools will assist EEO practitioners in executing their role and responsibilities in a more efficient manner. Finally, to emphasize the critical role of supervisors and managers to foster an inclusive work environment that provides equality of opportunity to all employees, commands will be required to report on their efforts to provide them information on EEO initiatives, to involve them in barrier analysis efforts and reporting outcomes.

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, Harvey C. Barnum, Jr., Assistant Secretary of the Navy am the  
(Manpower and Reserve Affairs), Acting

EEO Director for the Department of the Navy

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 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, 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.

Judith K. Scott

JUDITH K. SCOTT

3/19/2009

Date

Signature of EEO Program Director certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEOC MD-715.

Harvey C. Barnum, Jr.

Signature of EEO Director

3/31/2009

Date

EEOC FORM 715-01 PART G		U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
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	
<p>The Agency Head was installed on January 2006. The EEO policy statement was issued on August 27, 2007. Was the EEO policy Statement issued within 6 - 9 months of the installation of the Agency Head? If no, provide an explanation.</p>				X	The Secretary of the Navy (SECNAV) is responsible for the Total Naval Force which includes active duty military, civilians and contractors. Due to this unique organizational construct, the SECNAV issued a Diversity Statement that addressed the EEO/EO requirements for the agency's Total Force.
<p>During the current Agency Head's tenure, has the EEO policy Statement been re-issued annually? If no, provide an explanation.</p>				X	With the recent change of the administration, a new Secretary of the Navy is expected to be appointed in the next few months. The DON EEO Policy statement will be drafted and issued as required.
<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		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
 Measures			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		

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)]	X		Major commands indicate compliance with this measure. DON will continue to conduct validation visits to substantiate command responses for this PART.
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 Compliance Indicator	<b>Agency EEO policy is vigorously enforced by agency management.</b>	Measure has been met		<b>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</b>
 Measures		Yes	No	
Are managers and supervisors evaluated on their commitment to agency EEO policies and principles, including their efforts to:		X		Major commands indicate compliance with this measure. DON continues to conduct validation visits to substantiate command responses for this PART.
resolve problems/disagreements and other conflicts in their respective work environments as they arise?		X		
address concerns, whether perceived or real, raised by employees and following-up with appropriate action to correct or eliminate tension in the workplace?		X		
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		
ensure full cooperation of employees under his/her supervision with EEO office officials such as EEO Counselors, EEO Investigators, etc.?		X		
ensure a workplace that is free from all forms of discrimination, harassment and retaliation?		X		
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		
ensure the provision of requested religious accommodations when such accommodations do not cause an undue hardship?		X		
ensure the provision of requested disability accommodations to qualified individuals with disabilities when such accommodations do not cause an undue hardship?		X		
Have all employees been informed about what behaviors are inappropriate in the workplace and that this behavior may result in disciplinary actions?		X		
Describe what means were utilized by the agency to so inform its workforce about the penalties for unacceptable behavior.				
	The Schedule of Offenses and Recommended Penalties is posted on the DON HR website, Civilian Human Resources Manual, Subchapter 752, Appendix B.			

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	Command responses to this measure indicate that training on reasonable accommodation has not been provided consistently within the DON. See FY 09 Part H, EEO Plan #H-09 (1), for planned activities to address this deficiency.

<b>Essential Element B: INTEGRATION OF EEO INTO THE AGENCY'S STRATEGIC MISSION</b> <b>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.</b>				
 <b>Compliance Indicator</b>	<b>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.</b>	<b>Measure has been met</b>		<b>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</b>
		 <b>Measures</b>	Yes	
Is the EEO Director under the direct supervision of the agency head? <b>[see 29 CFR §1614.102(b)(4)]</b> 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		At the agency level, the DON EEO Director reports directly to the Secretary of the Navy. In subordinate commands/activities, the deputy to the EEO Officer is organizationally aligned in the Human Resources Office with dotted-line direct access to the EEO Officer.
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	See FY 09 Part H, EEO Plan #H-09 (1), for planned activities to address this deficiency.
If the agency has 2 <sup>nd</sup> level reporting components, are there organizational charts that clearly define the reporting structure for EEO programs?		X		
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?		X		
If not, please describe how EEO program authority is delegated to subordinate reporting components.				

 Compliance Indicator	<p>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.</p>	Measure has been met		<p>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</p>
 Measures		Yes	No	
	<p>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?</p>	X		
	<p>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?</p>	X		<p>Although this measure was met at the agency level, some commands reported that this measure was not met. See FY 09 Part H, EEO Plan #H-09 (1), for planned activities to address this deficiency.</p>
	<p>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?</p>	X		<p>While this is standard practice at the agency level, it is not consistently so across subordinate components. This issue is addressed in the FY 09 Part H, EEO Plan #H-09 (1), planned activities.</p>
	<p>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?</p>	X		
	<p>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)]</p>	X		
	<p>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?</p>	X		<p>While this is standard practice at the agency level, it is not consistently so across subordinate components. This issue will be addressed with the commands during the DON validation visits.</p>
 Compliance Indicator	<p>The agency has committed sufficient human resources and budget allocations to its EEO programs to ensure successful operation.</p>	Measure has been met		<p>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</p>
 Measures		Yes	No	

				<b>status report</b>
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		The inconsistent application of roles and responsibilities within the HR/EEO community has impacted the commands' ability to conduct the required self-assessments, self-analyses and to maintain an effective complaint processing system. See FY 09 Part H, EEO Plan #H-09 (2), for planned activities to address this deficiency.
Are statutory/regulatory EEO related Special Emphasis Programs sufficiently staffed?	X			While this is true at the agency level, the issue identified in the previous question also impacts this measure.
Federal Women's Program - 5 U.S.C. 7201; 38 U.S.C. 4214; Title 5 CFR, Subpart B, 720.204	X			
Hispanic Employment Program - Title 5 CFR, Subpart B, 720.204	X			
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			Historically, this program was effectively managed as a collateral duty at the DON level. However, it was recently decided that a more focused effort was needed due to on-going employment issues specific to Individuals with Disabilities. A position on the DON EEO Program Director's staff, dedicated to this issue, was recently established and is in the process of being filled.
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			
 <b>Compliance</b>	<b>The agency has committed sufficient budget to support</b>		<b>Measure</b>	<b>For all unmet</b>

Indicator	the success of its EEO Programs.	has been met		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	See FY 09 Part H, EEO Plan #H-09 (1), for planned activities to address this deficiency.
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		
Is there a central fund or other mechanism for funding supplies, equipment and services necessary to provide disability accommodations?		X		Major commands have the responsibility to provide funding for reasonable accommodation requests. Commands also utilize the DoD CAP program to support most requests.
Does the agency fund major renovation projects to ensure timely compliance with Uniform Federal Accessibility Standards?		X		Funding is provided at the major command level.
Is the EEO Program allocated sufficient resources to train all employees on EEO Programs, including administrative and judicial remedial procedures available to employees?		X		Command responses indicate that this measure has been met. DON on-site visits will validate if the inconsistent application of roles and responsibilities within the HR/EEO community, identified above, has impacted this measure.
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:		X		
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.**

 <b>Compliance Indicator</b>	<b>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.</b>	<b>Measure has been met</b>		<b>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</b>
		<b>Yes</b>	<b>No</b>	
 <b>Measures</b>				
	Are regular (monthly/quarterly/semi-annually) EEO updates provided to management/supervisory officials by EEO program officials?	X		Regular updates are provided at the agency level. However, the inconsistent application of HR/EEO roles and responsibilities within the HR/EEO community has impacted this measure at the command level. This continues to be an on-going initiative at the DON level. See FY 09 Part H, EEO Plan #H-09 (1), for planned activities to address this deficiency.
	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		
 <b>Compliance Indicator</b>	<b>The Human Resources Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures are in conformity with instructions contained in EEOC management directives. [see 29 CFR § 1614.102(b)(3)]</b>	<b>Measure has been met</b>		<b>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</b>
 <b>Measures</b>		<b>Yes</b>	<b>No</b>	
	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 FY 09 Part H, EEO Plan #H-09 (1), for planned activities to address this deficiency.
	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 FY 09 Part H, EEO Plan #H-09 (1), for planned activities to address this deficiency.
	Have time-tables or schedules been established for the agency to review its		X	See FY 09 Part H, EEO

Employee Development/Training Programs for systemic barriers that may be impeding full participation in training opportunities by all groups?				Plan #H-09 (1), for planned activities to address this deficiency.
 <b>Compliance Indicator</b>	<b>When findings of discrimination are made, the agency explores whether or not disciplinary actions should be taken.</b>	<b>Measure has been met</b>		<b>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</b>
 <b>Measures</b>		<b>Yes</b>	<b>No</b>	
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?		X		
<p>If so, cite number found to have discriminated and list penalty /disciplinary action for each type of violation.</p> <p>After the circumstances surrounding each case were reviewed, it was determined that disciplinary action was not warranted. However, other action, as appropriate was implemented.</p>				
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		

<b>Essential Element D: PROACTIVE PREVENTION</b>				
<b>Requires that the agency head makes early efforts to prevent discriminatory actions and eliminate barriers to equal employment opportunity in the workplace.</b>				
 <b>Compliance Indicator</b>	<b>Analyses to identify and remove unnecessary barriers to employment are conducted throughout the year.</b>	<b>Measure has been met</b>		<b>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</b>
 <b>Measures</b>		<b>Yes</b>	<b>No</b>	
Do senior managers meet with and assist the EEO Director and/or other EEO Program Officials in the identification of barriers that may be impeding the realization of equal employment opportunity?			X	While this is standard practice at the agency level, some commands indicate managers are not involved in the identification of barriers. See FY 09 Part H, EEO Plan for planned activities to address this deficiency.
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	Same as above.

Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans?			X	Same as above.
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	This is not consistently accomplished at the subordinate command level. See FY 09 Part H, EEO Plan #H-09 (1), for planned activities to address this deficiency.
 <b>Compliance Indicator</b>	<b>The use of Alternative Dispute Resolution (ADR) is encouraged by senior management.</b>	<b>Measure has been met</b>		<b>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</b>
 <b>Measures</b>		<b>Yes</b>	<b>No</b>	
Are all employees encouraged to use ADR?		X		
Is the participation of supervisors and managers in the ADR process required?			X	Although there is no requirement to participate in the ADR process, commencing in FY 2009, supervisors/managers must document the reason and sign it when declining to participate. This information will be provided to the next level of management and forwarded to the DON ADR Program office. No EEO Plan was developed as this was required in a recent action memorandum approved by the SECNAV.

<b>Essential Element E: EFFICIENCY</b>			
<b>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.</b>			
 <b>Compliance Indicator</b>	<b>The agency has sufficient staffing, funding, and authority to achieve the elimination of identified barriers.</b>	<b>Measure has been met</b>	<b>For all unmet measures, provide a brief explanation in the space</b>

 Measures		Yes	No	<b>below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>
	Does the EEO Office employ personnel with adequate training and experience to conduct the analyses required by MD-715 and these instructions?		X	EEO staff at the agency level has the training and experience. However, based on the reviews of command level submissions, there is still much work to be accomplished in this area. See FY 09 Part H, EEO Plan #H-09 (1), for planned activities to address this deficiency.
	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	DON has an automated data system that provides workforce demographic information. However, we are still working on an automated system to capture applicant flow information. See FY 09 Part H, EEO Plan #H-09 (1), for planned activities to address this deficiency.
	Have sufficient resources been provided to conduct effective audits of field facilities' efforts to achieve a model EEO program and eliminate discrimination under Title VII and the Rehabilitation Act?	X		
	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		All subordinate commands indicated that reasonable accommodation requests are processed within the requisite timeframe. This information will be reviewed and validated during scheduled on-site visits by DON.
 Compliance Indicator	<b>The agency has an effective complaint tracking and monitoring system in place to increase the effectiveness of the agency's EEO Programs.</b>	<b>Measure has been met</b>		<b>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</b>
 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:</p> <p>DON requires the use of full-time EEO counselors. In exceptional circumstances when the use of contractors is deemed necessary, the DON EEO Office approves the request, reviews the statement of work and holds the EEO processing office responsible for meeting timeframes. Performance measures are reported to major commands. Very few contractors are currently used and closer oversight of performance is required. DON uses the services of DoD investigators and performs significant oversight of the investigative process to ensure timeliness and monitor/improve quality and efficiency.</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		
 <b>Compliance Indicator</b>	<p><b>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.</b></p>	<b>Measure has been met</b>		<p><b>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</b></p>
 <b>Measures</b>		<b>Yes</b>	<b>No</b>	
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	<p>As a result of executing planned activities reported in the FY 07 Part H, EEO Plan, 76% of EEO counselings were timely in FY 08, an improvement of 13% when compared to the previous fiscal year. While significant progress has been made, we plan to continue efforts to further increase the percentage of timely EEO counselings. See FY 09 Part H, EEO Plan #H-09 (1), for planned activities to address this deficiency.</p>
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	<p>The percentage of timely investigations decreased when compared to the previous reporting period, 43% in FY 08 and 55.5 % in FY 07. See FY 09 Part H, EEO Plan #H-09 (1), for planned activities to address this deficiency.</p>
When a complainant requests a final agency decision, does the agency issue the decision within 60 days of the request?		X		
When a complainant requests a hearing, does the agency immediately upon receipt of the request from the EEOC AJ forward the investigative file		X		

to the EEOC Hearing Office?				
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		
 <b>Compliance Indicator</b>	<b>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.</b>	<b>Measure has been met</b>		<b>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</b>
 <b>Measures</b>		<b>Yes</b>	<b>No</b>	
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	Although there is no requirement to participate in the ADR process, commencing in FY 2009, supervisors/managers must and sign document their reason(s) for declining to participate. This information will be provided to the next level of management and forwarded to the DON ADR Program office. No EEO Plan was developed as this was required in a recent action memorandum approved by the SECNAV.
Does the responsible management official directly involved in the dispute have settlement authority?		X		
 <b>Compliance Indicator</b>	<b>The agency has effective systems in place for maintaining and evaluating the impact and effectiveness of its EEO programs.</b>	<b>Measure has been met</b>		<b>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</b>
 <b>Measures</b>		<b>Yes</b>	<b>No</b>	
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	The inconsistent application of roles and responsibilities within the HR/EEO community has impacted the processing of EEO complaints in

				terms of quality and timeliness. See FY 09 Part H, EEO Plan #H-09 (2) for planned activities to address this deficiency.	
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 EEO programs address all of the laws enforced by the EEOC?	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?		X		DON continues to work on developing an automated system to capture applicant pool information. See FY 09 Part H, EEO Plan #H-09 (1), for planned activities to address this deficiency.	
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				
 <b>Compliance Indicator</b>	<b>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.</b>		<b>Measure has been met</b>		<b>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</b>
 <b>Measures</b>			<b>Yes</b>	<b>No</b>	
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				

<b>Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE</b>					
<b>This element requires that federal agencies are in full compliance with EEO statutes and EEOC regulations, policy guidance, and other written instructions.</b>					
 <b>Compliance Indicator</b>	<b>Agency personnel are accountable for timely compliance with orders issued by EEOC Administrative Judges.</b>		<b>Measure has been met</b>		<b>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</b>
 <b>Measures</b>			<b>Yes</b>	<b>No</b>	
	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		
 <b>Compliance Indicator</b>	<b>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.</b>	<b>Measure has been met</b>		<b>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</b>
 <b>Measures</b>		Yes	No	
Does the agency have control over the payroll processing function of the agency? If Yes, answer the two questions below.			X	The Defense Finance and Accounting Service manages the DON payroll processing function.
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		
 <b>Compliance Indicator</b>	<b>Agency personnel are accountable for the timely completion of actions required to comply with orders of EEOC.</b>	<b>Measure has been met</b>		<b>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</b>
 <b>Measures</b>		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.		Jamie Kajouras, Director, NAVOECMA, YC-260-03 Judy Caniban, Compliance Program Manager, YA-260-02		
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.				
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		X		

amount and the criteria used to calculate the award?			
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		
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.

EEOC FORM  
715-01 PART H

*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**

<b>FY 2008 Department of the Navy EEO Plan</b>	
STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	<p>Program alignment has been the focus for the DON EEO Program for the last two fiscal years. While significant progress has been made, additional efforts are needed to establish a solid foundation for the successful implementation and maintenance of a model EEO Program. In FY-08, our plan is to address identified deficiencies related to program alignment in the essential elements identified below.</p> <p>Essential Element B: Integration of EEO into the Agency's Strategic Mission</p> <p>Essential Element C: Management and program Accountability</p> <p>Essential Element D: Proactive Prevention of Discrimination</p> <p>Essential Element E: Efficiency</p> <ul style="list-style-type: none"><li>• Additional training/guidance for employees/EEO practitioners/supervisors/managers on EEO program requirements and roles/responsibilities is needed.</li><li>• Improve effective utilization of current resources.</li><li>• Enhance current data systems and develop necessary tracking/monitoring systems.</li></ul> <p>We expect that the emphasis after the next reporting period will be on honing practitioners' skills so that they may effectively execute their role as a consultant to supervisors/managers. The successful execution of the role of consultant is critical to DON's goal of providing equality of opportunity in the workplace to all employees and applicants for employment.</p>
<b>OBJECTIVE #H-08 (1):</b>	<p><b>1A. To provide on-going EEO program training, education, guidance and communication; and high level review/validation of program efforts.</b></p> <p><b>1B. To provide EEO/HR professionals with the necessary tools/infrastructure to meet program requirements.</b></p>

RESPONSIBLE OFFICIAL:	DON EEO Program Manager
DATE OBJECTIVE INITIATED:	1 October 2007
TARGET DATE FOR COMPLETION OF OBJECTIVE:	30 September 2008

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
<p>Launch the EEO Institute as vehicle for DON EEO communications and provider of practitioner, employee and supervisor/manager training.</p> <p>a. Provide detailed barrier analysis training. Target Date: monthly beginning May 2008.</p> <p>b. Market importance of barrier analysis. Target quarterly, beginning 1 July 08</p>	31 May 2008
At the FY-08 DON HR/EEO Conference, focus EEO plenary and some breakout sessions on EEO roles, responsibilities and expectations for HR/EEO professionals.	31 March 2008
Develop and issue new DON policy and guidance (three Civilian Human Resources Manual subchapters), i.e., Conducting Barrier Analysis; EEO Program Assessment Guide; and Anti-Harassment Program.	31 July 2008
Conduct 5 program validation visits and 3 EEO office site visits	30 September 2008
Provide feedback on Annual Assessment Reports to major commands.	30 April 2008
Implement on-going process for quarterly total program report cards to major commands.	31 July; 31 October 2008
Update and implement the DON DVAAP and FEORP programs.	30 June 2008
Update and implement the DON Hispanic Employment Program.	30 June 2008
Develop and implement the tools and common business processes needed to track and make available applicant flow data.	30 June 2008
Implement a mechanism to track and monitor reasonable	30 September 2008

accommodation requests.	
Implement eVersity as an agency-wide common data tool for use in barrier/trend analysis.	30 June 2008

REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE

1. Launch the EEO Institute as a vehicle for DON EEO communications and provider of practitioner, employee and supervisor/manager training.

Due to budgetary issues, the formal stand-up of the EEO Institute was delayed. In the interim, pending resolution of this issue, we have explored the possibility of implementing the DON EEO communications portion of the Institute. In addition, course offerings for practitioners were developed and deployed.

- A training course, EEO for Human Resources (HR) Professionals, was developed and piloted in April 2008. The objectives of this course are to educate HR professionals on the importance of collaborative relationships between HR/EEO and supervisors/managers in sustaining an inclusive environment and that equality of opportunity in all aspects of employment is key to attracting, developing and retaining a top-quality workforce that can deliver results and ensure accomplishment of the DON mission. This pilot course was well-received by attendees and feedback from participants indicated an understanding of the relevance of this topic to their assigned duties. A full schedule is being developed for FY 2009 following final modifications to the course content.
  - An Advanced EEO Counselor training course is currently in the developmental stages with plans for initial deployment of a full schedule of offerings in the first quarter FY 2009.
  - No Fear Act training has been developed and is currently in the review stage. This training is scheduled for deployment in the first quarter FY 2009.
- a. Provide detailed barrier analysis training. Target Date: monthly beginning May 2008.

Barrier analysis training was provided by in-house subject matter experts and the Defense Equal Opportunity Management Institute. Efforts are ongoing to consolidate and standardize barrier analysis training within the DON. Plans to develop and deploy a Barrier Analysis training course as part of the EEO Institute will be initiated in FY 2009.

The final draft of the DON Guide for Conducting Effective Barrier Analysis was disseminated to and reviewed by the Command Deputy EEO Officers. The guide is currently in the chop chain for the Assistant Secretary of the Navy's (Manpower and Reserve Affairs) signature. The guide will be disseminated upon approval.

- b. Market importance of barrier analysis. Target quarterly, beginning 1 July 08.

Written feedback to the major commands on their FY 2007 Annual EEO Program Status Report submissions emphasized the importance of focused barrier analysis efforts and reinforced DON's expectations that incremental progress from one fiscal year to the next is expected in this area.

Regular, monthly meetings are held with all the Command Deputy EEO Officers. Periodically, reminders about the importance of in-depth barrier analysis and the expectation that they communicate this requirement down to the activity levels were distributed.

2. At the FY-08 DON HR/EEO Conference, focus EEO plenary and some breakout sessions on EEO roles, responsibilities and expectations for HR/EEO professionals.

The theme for the FY-08 DON HR/EEO Conference was ‘Transforming and Building the HR Community for the 21<sup>st</sup> Century’. Plenary sessions and workshops focused on the development of the HR/EEO community and working together to achieve major initiatives.

A plenary session on the Workforce Perspective featured James H. Johnson, Jr., Director, Urban Investment Strategies Center, Kenan-Flagler Business School, University of North Carolina, who spoke on the topic of People and Jobs on the Move – Implications for Workforce Development. This session highlighted current and future changes in U.S. demographics; the reasons for these changes; and, the anticipated resultant impact on federal workforce demographics. Workshops included: What’s My role? A Panel Discussion on the Roles and Responsibilities of HRO, EEO, ADR, and OGC in Ensuring EEO in the DON; The Panel Gave Me Good Ideas – How Does It Really Work/What Do I Need to Know?; Flawless Consulting; Drilling Down: What’s Reasonable, What’s Not. The 21<sup>st</sup> Century HR/EEO community must be cognizant of its responsibilities and duties under the Privacy Act; Selecting and Using Data for Workforce Analysis. The plenary session and workshops highlighted role/responsibilities and encouraged a collaborative relationship within the HR/EEO community to further our goal of an inclusive work environment that provides equality of opportunity for all employees.

3. Develop and issue new DON policy and guidance (3 Civilian Human Resources Manual (CHRM) subchapters), i.e., Conducting Barrier Analysis, EEO Program Assessment Guide; and Anti-Harassment Program.

The DON Guide for Conducting Effective Barrier Analysis and the EEO Program Assessments subchapters were finalized, routed to the Command Deputy EEO Officers for comment, briefed to the Deputy Assistant Secretary of the Navy (Civilian Human Resources) and the Assistant Secretary of the Navy (Manpower and Reserve Affairs), and are currently in the chop chain for signature.

The DON Anti-Harassment Program and policy is currently in the final review stage.

4. Conduct 5 program validation visits and 3 EEO office site visits.

Program validation visits at the command level were conducted. These visits have proven to be effective toward meeting the DON goal to align our EEO program efforts. During these visits, command self-assessment efforts are validated; outbriefs are scheduled with the command’s EEO to provide an overview of the current state of the health of the command’s EEO program; and, recommendations, as needed, are provided for program improvements.

During FY 2008, after receipt of feedback following an office site visit, it was decided that these visits should only be accomplished at the DON level in rare circumstances. It was determined that the responsibility to correct program deficiencies at the activity and/or

servicing personnel office, should be at the major command level. The commands will be held accountable for ensuring that identified deficiencies are corrected and program execution efforts are compliant with DON policy.

5. Provide feedback on Annual Assessment Reports to major commands.

DON continues to provide feedback to all the major commands on their Annual EEO Program Status Report submissions. This year the command's FY 2007 reports were reviewed to ensure that recommendations for improvement from the previous year were implemented and that the command's EEO program is in alignment with the DON goals and objectives.

Each year DON raises the benchmark for the implementation of a compliant EEO program. This year, with the full backing and support of the DASN (CHR), the DON emphasis is on program accountability. Some examples of how commands are evaluated on accountability include: reviews of Annual EEO Program Status Report submissions; on-site validation visits; scorecards on complaints processing; responsiveness to DON initiatives, policy guidance and action items, etc.

6. Implement on-going process for quarterly total program report cards to major commands.

In FY 2008, each command received a detailed scorecard on the timeliness and quality of their discrimination complaints processing procedures. A total program report card has been drafted and briefed to the DASN (CHR). The initial deployment of command report cards, on a regular basis, will coincide with the formal feedback provided to each command on their signed FY 2008 Annual EEO Program Status report submission.

7. Update and implement the DON DVAAP and FEORP programs.

HR and EEO professionals continue their collaborative efforts to ensure that all consultative advice and guidance to managers and supervisors provides equality of opportunity for all employees and results in an inclusive work environment. Two major efforts in this reporting period were to update and implement the Disabled Veterans Affirmative Action Program (DVAAP) and the Federal Equal Opportunity Recruitment Program (FEORP).

- The DVAAP team included representatives from a major command, the Recruitment Division, the Workforce Development Division, an OCHR Common Business Practice (CBP) Expert and EEO Program Managers. The team has completed a working draft. The draft is still a work in progress and the team is on schedule for finalizing the draft in FY 2009 for review, approval and DON-wide implementation.
- The FEORP team included members from the Recruitment Division, Human Resources Service Centers, Workforce Development Division, a major command and an EEO Program Manager. The members reviewed the applicable law and regulations, identified their respective roles and assigned action items. Due to the unexpected departure of the Recruitment Division representative and a delay in identifying a replacement, progress on this planned activity was slower than expected. A meeting is scheduled for the first quarter 2009 and a final draft should be completed in FY 2009 for review, approval and DON-wide implementation.

8. Update and implement the DON Hispanic Employment Program.

For the last several years, Hispanic participation rate in the DON workforce has continued to increase, albeit slightly. As one of the few groups in the DON that continue to participate at a low rate overall when compared to the National Civilian Labor Force, DON recognized the importance of identifying and eliminating any barriers that may be adversely impacting this group. In FY 2004, the DON developed and implemented a PART K, Hispanic Employment Program (HEP), a component unique requirement for all its commands. Not satisfied with modest success in this area, an update of the DON HEP Program was initiated in FY 2008 to raise the benchmark and expectations for this program. An initial, updated draft of the Secretary of the Navy Instruction (SECNAVINST) has been completed and the DON PART K will be modified to reflect these new requirements. The updated SECNAVINST and revised DON PART K will be finalized in FY 2009.

9. Develop and implement the tools and common business processes needed to track and make available applicant flow data.

Efforts continue to make applicant flow data available to conduct the required analyses. Workload priorities and complexities associated with this tasking resulted in much slower progress than expected. Some applicant flow data is available in the DON Affirmative Employment Reporting Tool (DART). However, the size of this report and its current format are not user friendly.

A determination to pursue improvements to the DART reporting capability are pending the outcome of DoD collaborative efforts, which have been ongoing since July 2007, to gather common requirements and develop common processes to facilitate Department-wide recruitment and hiring. The DoD Enterprise Staffing Solution (ESS) is expected to replace Resumix, DoD's current system for hiring, in the future pending the outcome of pilot programs.

The DoD ESS is expected to enable a more efficient management of the complete hiring lifecycle, from recruitment to Entrance-on-Duty (EOD), and will significantly improve DoD's ability to quickly identify and hire a capable, agile, diverse, and mission ready workforce. DoD ESS applies Lean Six Sigma principles to standardize the civilian hiring process across the Department and is the foremost human capital initiative for transforming the role of HR to a consultative thought-leader, working collaboratively with hiring managers to enhance the workforce and support the Warfighter with top talent.

Members of the DON Office of EEO and Diversity Management are included in the core working group for the implementation of DoD ESS in the DON. We are currently reviewing the capability of DoD ESS to provide the applicant flow data necessary to conduct the required analysis.

10. Implement a mechanism to track and monitor reasonable accommodation requests.

An off-the-shelf, automated data tracking system has been identified as the DON mechanism to track and monitor reasonable accommodation requests. Discussions with the contractor have taken place and budget allocated to purchase this data tracking system. DON server requirements and capability issues to confirm system functionality are currently under review. Purchase of the system is expected in the third quarter of FY 2009, but is dependent upon the

outcome of these issues.

11. Implement eVersity as an agency-wide common data tool for use in barrier/trend analysis.

Navy-Marine Corps Internet (NMCI), security, and server capacity issues hampered expected progress on this initiative. The NMCI and server issues have been resolved, leaving only the resolution of the security issue prior to deployment of this data system in the next reporting period. Meanwhile, concurrent efforts to develop a regular, recurring report to populate required eVersity data fields with data from the Defense Civilian Personnel Data System (DCPDS) continued. This portion of the tasking has been completed and we are in the process of developing a standardized procedure for downloading the completed report from DCPDS and uploading it into eVersity. A test run of this phase of the process will be accomplished when the security issues are resolved.

In addition, another development impacting the deployment of eVersity was identified. DON is one of the larger components using this data tool and will have users down to the fourth level reporting component. The contractor did not anticipate the scope and impact of the DON requirement to provide a considerable number of different RCLFs, i.e., NCLF, SMSAs, national series specific CLFs, local series specific CLFs, etc., needed to accomplish the required in-depth barrier analysis at this level. A plan will be developed in the first quarter of FY 2009 to address this requirement.

#### OTHER ACCOMPLISHMENTS

A DON EEO staff member chairs the selection panel for Deputy EEO Officer positions at the major command level and serves as a selection panel member for Deputy EEO Officer positions at the activity level. In these roles, the DON has considerable input in ensuring that individuals selected for these critical positions have the required knowledge, skills and abilities to execute and manage effective EEO programs.

EEOC FORM  
715-01 PART H  
*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**

<b>FY 2008 Department of the Navy EEO Plan</b>	
STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	<p><u>Management and Program Accountability</u></p> <p>Program alignment continues as a focus for the DON EEO Program. While previous/ongoing efforts have been successful, work still needs to be done to ensure all with EEO Program responsibility have all the tools they need for successful complaints processing.</p> <p><u>Responsiveness and Legal Compliance</u></p> <p>Time to move to the next step of using implemented tools to track, monitor and report on progress being made.</p>
<b>OBJECTIVE #H-08 (2):</b>	<b>Implement initiatives to ensure consistent application of discrimination complaints procedures. Address issues of accountability; quality and service delivery; and compliance.</b>
RESPONSIBLE OFFICIAL:	Director, Naval Office of EEO Complaints Management and Adjudication; Field level EEO Case Managers
DATE OBJECTIVE INITIATED:	1 January 2008
TARGET DATE FOR COMPLETION OF OBJECTIVE:	2 February 2009
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
Conduct program evaluations at all sites at the operations level to assess application of DON complaints processing guidance.	31 January 2009
Use Key Indicator Report, data analysis etc. to identify significant processing issues and develop training/briefings to ensure consistent procedures.	30 June 2008 31 December 2008
Develop standardized feedback mechanism for Major Commands	30 June 2008

on service delivery issues with respect to compliance actions.	
Develop procedures to review Dismissal Actions for sufficiency and compliance with regulatory guidance.	30 September 2008
Conduct an ongoing review of cases pending merit decisions and assess trends and questionable management actions. Take immediate action as appropriate. An annual report on findings, recommendations and results will be provided to the ASN (M&RA) and the DASN (CHR).	31 December 2008

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

### 1. Conduct program evaluations at all sites at the operations level to assess application of DON complaints processing guidance.

The Naval Office of EEO Complaints Management and Adjudication (NAVOECMA), a part of the DON EEO Office, conducted quarterly reviews of servicing EEO offices' complaints processes to evaluate their implementation of EEOC and DON complaints processing requirements and to verify the quality of the data in iComplaints, the DON's automated complaints tracking system. Complaints processing scorecards were provided to all the commands and, if applicable, notified them of significant processing issues and the requirement to correct/update the identified deficiencies. Routinely, guidance, often on a one-on-one basis, was provided to the EEO servicing offices to ensure that complaints processing was compliant, timely, consistent and effective.

NAVOECMA also performed a quarterly comparison of the data maintained by the Department of Defense, Investigation and Resolutions Division, (IRD) and the data reported in iComplaints to allow the early detection of processing and data deficiencies. When deficiencies were identified, appropriate corrective measures were implemented.

In FY 2008, DON conducted an on-site assist visit at the Pearl Harbor servicing EEO office after processing issues were identified. During the visit, the servicing office was tasked with establishing a plan of action for the timely processing of complaints that is compliant with 29 CFR 1614, MD 110 and the DON Civilian Discrimination Complaints Management Program.

### 2. Use Key Indicator Report, data analysis etc. to identify significant processing issues and develop training/briefings to ensure consistent procedures.

As a result of these efforts, in FY 2008, 76% of EEO counselings were timely, a significant improvement from 63.3% in FY 2007 and 61.4 in FY 2006.

In FY 2008, 43% of investigations were completed on time, a decrease from 55.5% in FY 2007.

While some progress has been noted, additional improvements to the quality and timeliness of complaints processing is still required. In an effort to improve the counseling skills of EEO practitioners, DON is deploying an advanced EEO counseling course in FY 2009. This course will hone EEO counselors' skills in the following areas: identifying and framing claims;

interviewing techniques; conducting final interviews; developing complete pre-complaint records; and writing counselor reports.

In its FY 2008 report, EEOC ranked DON second among all the federal agencies that issued Final Agency Decisions (FAD) within the regulatory timeframes. In FY 2008, 97.9% of FADs were timely issued which is a continuation of improvement from 96.2% in FY 2007 and 82.6% in FY 2006.

3. Develop standardized feedback mechanism for Major Commands on service delivery issues with respect to compliance actions.

Following the EEOC's e-notice process, NAVOECMA implemented an e-notification process to advise servicing EEO offices of appeal and compliance actions. Appeal notices are forwarded to the servicing EEO office within 24 hours of receipt from OFO, resulting in more timely submissions. At the end of FY 2008, DON had no outstanding case file requests over 60 days. In addition, DON submitted agency appeal briefs, as required, with fewer requests for extensions. E-Notice was also utilized to respond to EEOC requests for additional information in a more expeditious manner.

On compliance matters, NAVOECMA sent regular e-notice reminders to the appropriate servicing EEO office to ensure timely compliance with the OFO order. In addition, a detailed listing of documents/information to document compliance, for submission to OFO, was provided by NAVOECMA to the servicing EEO office. At the end of FY 2008, there were only three compliance cases over 150 days. The quarterly discrimination complaints processing scorecards for each command includes a metric that measures how well they execute their compliance responsibilities.

4. Develop procedures to review Dismissal Actions for sufficiency and compliance with regulatory guidance.

In FY 2008, NAVOECMA required all servicing EEO offices to upload Notice of Dismissal letters into the iComplaints database. NAVOECMA conducts a review of all dismissal letters. If it is determined that a complaint was improperly dismissed, servicing EEO offices are provided a detailed analysis of the case and recommendations for corrective action. A regular review of all procedural appeals is also conducted to ensure dismissals were in accordance with 29 CFR 1614.107.

5. Conduct an ongoing review of cases pending merit decisions and assess trends and questionable management actions. Take immediate action as appropriate. An annual report on findings, recommendations and results will be provided to the ASN (M&RA) and the DASN (CHR).

In FY 2008, DON reviewed the circumstances that resulted in two findings of discrimination by EEOC Administrative Judges and each case file pending a Final Agency Decision (without a hearing) at the DON level. As a result of this review, a trend related to reasonable accommodation issues was uncovered. Actions to address this trend are described in the FY 2009 Part H EEO Plan #H-09 (1), planned activity #4.

*U.S. Equal Employment Opportunity Commission*

**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT  
EEO Plan to Eliminate Identified Barrier**

**FY 2008 Department of the Navy EEO Plan**

<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>Within the DON, the White Female, Hispanic Male and Hispanic Female and Individuals with Targeted Disabilities groups have been participating at levels well below comparative civilian labor force benchmarks.</p>
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>To determine the root causes of any potential barriers impacting these groups, in-depth analysis at all levels in the organization, particularly at the field activity level where most employment decisions are made, is required.</p> <p>Major Commands depend on the field activities to do thorough analyses of all identified barriers and establish corrective plans of action. When this is reported to the major command, the command's report and ultimately DON's report can provide an accurate picture of the state of the EEO health of the agency.</p> <p>To date, most major command annual submissions do not reflect this chain of events or plans that indicate any in-depth barrier analysis has been accomplished. This lack of in-depth analysis at the activity and command levels severely impacts the ability to develop meaningful plans that address the low participation rates of the groups identified above.</p>
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p>	<p>Due to the absence of in-depth barrier analysis at the activity and command levels, the accurate identification of any potential barriers that may impact these particular groups is not currently feasible.</p>

Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	When the results of in-depth barrier analysis efforts at the activity and command level are reported, accurate objectives and effective EEO Plans to eliminate identified barriers will be developed. In addition, a determination whether or not is appropriate to develop separate EEO Plans for each of the groups identified above will be made when this information becomes available for review.
<p><b>OBJECTIVE</b></p> <p><b>#I-08</b></p> <p>State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p><b>1A. To correct identified deficiencies in the alignment of the DON EEO Program.</b></p> <p><b>1B. In the interim, until the results of activity and command level in-depth barrier analysis efforts are reported, the DON will conduct a top-level data and trend analysis for the groups identified above.</b></p>
<b>RESPONSIBLE OFFICIAL:</b>	DON EEO Program Manager
<b>DATE OBJECTIVE INITIATED:</b>	1 October 2007
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	30 September 2008

<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
Implement Planned Activities identified in DON's PART H FY 200 submission to address deficiencies in program alignment. See PART H, FY 2008 EEO Plan, for specific details.	30 September 2008
Accomplish a comparative analysis of accession and separation rates for White females, Hispanic males and females and Individuals with Targeted Disabilities for the past three fiscal years.	30 September 2008
Accomplish data and trend analysis of DON major occupations for the purpose of identifying any additional triggers for potential barriers for White females, Hispanic males and females, and Individuals with Targeted Disabilities and their representation in these job series.	30 September 2008
Accomplish data and trend analysis of occupational groups for the purpose of identifying any additional triggers for potential barriers for White females,	30 September

Hispanic males and females, and Individuals with Targeted Disabilities and their representation in these occupations.

2008

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

### 1. Implement Planned Activities identified in DON's PART H FY 2008 submission to address deficiencies in program alignment.

See FY 08 Part H, EEO Plan, Objective #H-08 (1) for a detailed report of accomplishments for this planned activity.

### 2. Accomplish a comparative analysis of accession and separation rates for White females, Hispanic males and females and Individuals with Targeted Disabilities (IWTD) for the past three fiscal years.

*NOTE: The analyses below do not include the non-appropriated fund (NAF) employees. Although overall NAF workforce data was obtained, we were not able to get information on accessions and separations for this segment of the DON workforce in time for this reporting cycle.*

a. The participation rate of White females shows a slight numerical increase from FY 2007 to FY 2008, from 34,354 to 34,795 respectively. However, this group experienced a slight decrease in the percentage of their workforce participation rate over this same timeframe, from 19.5% to 19.2%. The slight dip in percentage may be attributed to the gains in the DON workforce from FY 2007 to FY 2008, i.e., 176,475 to 181,759.

In both FY 2006 and 2007, White females had a higher number of accessions when compared to their separation rate. However, during this same time period, White females separated at a slightly higher rate than their participation rate in the workforce.

Despite the slight numerical gain from FY 2007 to 2008, White females continue to participate at a low rate in the DON workforce when compared to the NCLF of 33.70%. Commands will be provided the information uncovered by the analysis at the DON level and tasked with conducting a more in-depth barrier analysis of the accession and separation rates for White females to identify any potential barriers and reporting results.

b. In FY 2006 and 2007, Hispanic males and females separated at a higher rate than their accession rate. However, in FY 2008 Hispanic males were hired in the DON at a rate that was 41% higher than their separation rate. In comparison, Hispanic females had an accession rate that was 22% higher than their separation rate. No particular trend related to the accession and separation rates of Hispanic males and females was found based on this analysis. Commands will be provided this information and tasked with continuing to track and monitor the accession/separation rates for this group. In addition, commands will be tasked with conducting a more in-depth barrier analysis to determine if there is a potential barrier with respect to the retention of Hispanic males and females and reporting results.

c. The comparative analysis indicated that, for the last three years, IWTD consistently separated at a higher rate than their rate of accessions. This trend resulted in a lower overall participation rate of IWTD in the DON workforce at the end of FY 2008 when compared to FY

2006.

To address the low number of accessions for IWTD, in FY 2007, DON established a hiring goal of 400. FY 2007 IWTD accessions fell considerably short of this goal. However, accessions in FY 2007 were higher when compared to FY 2006 and accessions in FY 2008 indicate further incremental progress forward. We anticipate that with continued agency-wide focus on the recruitment and employment of IWTD, the number of accessions from one fiscal year to the next will continue to increase.

Commands will be tasked with the establishment of a Special Program and Plan for the Recruitment, Hiring and Advancement of IWTD in FY 2009, for execution in 2010 and maintained in the out years. The program and plan will include the development of a strategy/plan to conduct more in-depth barrier analysis on their accessions/separations and to develop EEO plans, as appropriate.

3. Accomplish data and trend analysis of DON major occupations for the purpose of identifying any additional triggers for potential barriers for White females, Hispanic males and females, and Individuals with Targeted Disabilities and their representation in these job series.

*NOTE: The analyses below do not include the NAF employees. Although overall NAF workforce data was obtained, we were not able to get information on major occupations for this segment of the DON workforce in time for this reporting cycle.*

a. The percentage of employees in the DON's major occupations has remained fairly consistent during the last three years, i.e., approximately one-third of the workforce. A data comparison between FY 2007 and 2008 indicates that White females have a participation rate in the major occupations at a rate slightly higher than their overall participation rate in the workforce, i.e., a participation rate of 22% for both years, compared to a 20.68% and 20.75% participation rate in the overall workforce for 2007 and 2008, respectively. Commands will be provided the information uncovered by the analysis at the DON level and tasked with conducting a more in-depth barrier analysis on each of the individual series that represent the DON major occupations to identify any potential barriers and reporting results.

b. In FY 2006, 2007 and 2008, Hispanic males and females had a higher participation rate in the DON's major occupations when compared to their participation rate in the overall workforce. In particular, Hispanic females' participation rate in the major occupations was nearly double their participation rate in the overall workforce. From FY 2006 to 2008, Hispanic females showed a steady increase in their participation rate in the major occupations. The participation rate of Hispanic males in the major occupations dipped slightly during this same timeframe.

Commands will be provided the information uncovered by the analysis at the DON level and tasked with conducting a more in-depth barrier analysis on each of the individual series that represent the DON major occupations to determine if there are any potential barriers and reporting results.

c. As previously mentioned, the percentage of employees in the DON's major occupations has remained fairly consistent during the last three years. Likewise, the participation rate of IWTD in the major occupations has also remained constant, between .61 to .64%. For the least

three fiscal years, the IWTD participation rate in the major occupations has been lower than their participation rate in the overall workforce. Commands will be provided the information uncovered by the analysis at the DON level and tasked with conducting a more in-depth barrier analysis on each of the individual series that represent the DON major occupations as part of their Special Program/Plan and to develop EEO plans, as appropriate.

4. Accomplish data and trend analysis of occupational groups for the purpose of identifying any additional triggers for potential barriers for White females, Hispanic males and females, and Individuals with Targeted Disabilities and their representation in these occupations.

The capability to display the DON workforce in the EEOC Occupational Groups is still in the development stage and will not be available until some time in the next fiscal year. Commands will be asked to conduct this planned analysis in the next reporting period.

*NOTE: Although the capability to report information by occupational groups was completed in January 2009, allowing data to be populated in EEOC Workforce Data Tables A/B3, it was finished too late to conduct the analysis as planned.*



6.a. Time-Off Awards (Total hrs awarded)	504,889	31,426	6.22%	4,255	.84%	9,962	1.07%	459,246	91%
6.b. Cash Awards (total \$\$\$ awarded)	120,844,954	6,160,322	5.09%	692,152	.57%	2,624,898	2.17%	111,346,190	92.1%
6.c. Quality-Step Increase	3,873	188	4.85%	22	.57%	67	1.72%	3,596	92.8%

<b>EEOC FORM 715-01</b> Part J	Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals With Targeted Disabilities
<b>Part IV</b>  Identification and Elimination of Barriers	<p>Agencies with 1,000 or more permanent employees MUST conduct a barrier analysis to address any barriers to increasing employment opportunities for employees and applicants with targeted disabilities <b>using FORM 715-01 PART I</b>. Agencies should review their recruitment, hiring, career development, promotion, and retention of individuals with targeted disabilities in order to determine whether there are any barriers.</p> <p>The DON continues to have many of the same issues previously identified in our FY 2007 Accomplishment Report which hamper our efforts to effectively identify and eliminate barriers to equality of opportunity for individuals with targeted disabilities (IWTD). The ability to conduct a more in-depth barrier analysis remains a challenge due to the lack of tracking and monitoring systems for: applicant pool information; identifying the number of individuals with disabilities who have applied for positions with the DON; capturing the reasons why employees have left the workforce, etc. Some applicant pool information has been posted on the DON Affirmative Employment Reporting Tool (DART). However, the length of time to download this report and its current format, makes its use impracticable for the required analysis.</p> <p>In FY 2008, DON purchased eVersity, an automated reporting tool that provides the capability to display workforce data in EEOC Workforce Data Tables format and facilitates reporting requirements. We are in the process of developing procedures to download DON workforce data from the Defense Civilian Personnel Data System (DCPDS) to populate the required tables on a quarterly basis. Unfortunately, this process has proven to be more labor intensive and complex than expected and unforeseen delays have setback the much anticipated deployment of the eVersity tool. However, we anticipate that once this tool is up and running, it will greatly facilitate our efforts to conduct the required barrier analysis at all levels of the organization. Concurrent with our efforts to download workforce data from DCPDS, we are also working to develop a standardized report that will provide applicant flow information from Resumix. Once this capability is developed, we will run a test report to determine its utility and, if useful, this information will also be uploaded into eVersity on a quarterly basis.</p> <p>In the meantime, as reported in the accomplishment report for DON Objective H-08 #(1), DoD collaborative efforts to establish the Enterprise Staffing Solution (ESS), which is expected to replace Resumix DON's current system for hiring, will be piloted in FY 2009. We are currently reviewing the capability of DoD ESS to provide the applicant flow data necessary to conduct the required analysis. When ESS is fully deployed, we will explore the capability to upload applicant flow information from this system into eVersity.</p>

Although our efforts to conduct an in-depth barrier analysis were hindered by the issues described above, an analysis of the data and trends related to accessions/separations and major occupations were accomplished. The analysis by occupational groups was not accomplished as planned because DART is currently not configured to provide this data. The results of the data analysis for accessions/separations and major occupations are provided below. Please note that the analysis was accomplished on the DON permanent/temporary population only. An analysis of the non-appropriated fund instrumentality (NAF) workforce could not be accomplished because this data was largely unavailable.

#### ACCESSIONS/SEPARATIONS:

The results of this analysis reveals a consistent trend of a higher rate of separations when compared to the number of accessions for IWTD for the last three fiscal years, resulting in a progressively lower participation rate for IWTD from FY 2006 to the end of FY 2008. Although the majority of the separations were voluntary, 19% were involuntary. A more in-depth analysis must be performed at the command level to determine if there is a barrier with respect to the retention of IWTD.

To address the low number of accessions for IWTD, in FY 2007, DON established a hiring goal of 400. DON IWTD accessions at the end of FY 2007 fell far short of this goal. However, accessions in FY 2007 were higher when compared to FY 2006 and accessions in FY 2008 indicate further incremental progress forward. We anticipate that with continued agency-wide focus on the recruitment and employment of IWTD, the number of accessions from one fiscal year to the next will continue to increase. We understand the necessity to achieve a higher number of accessions, to offset the normal separation rate, to realize a net increase in the overall participation rate for IWTD in the DON workforce. This information will be communicated and taskings assigned to the commands for execution.

Commands will be tasked with the establishment of a Special Program and plan for the recruitment, hiring and advancement of IWTD in FY 2009, for execution in 2010 and maintained in the out years. DON has accepted the EEOC's goal of 2% participation rate of IWTD by 2010. Specific planned activities for implementation plans provided in Part V below.

#### MAJOR OCCUPATIONS:

The percentage of employees in the DON's major occupations has remained fairly consistent during the last three years, i.e., approximately one-third of the workforce. Likewise, the participation rate of IWTD in the major occupations has also remained constant, between .61 to .64%. For the last three fiscal years, the IWTD participation rate in the major occupations has been lower than their participation rate in the overall workforce. No other notable trends were identified as a result of this analysis.

Commands will be tasked with conducting a more in-depth barrier analysis on

their major occupation categories as part of their Special Program and plan.

FY 2008 ACCOMPLISHMENTS:

- A DON review of subordinate commands' Special Program Plan submissions for the fiscal year 2007 indicated that additional guidance and direction to conduct the required analysis was needed. Initiatives implemented in FY 2008 to address this issue included:
  - Drafting a DON Guide for Conducting an Effective Barrier Analysis which is currently in the chop chain for signature;
  - Updating the DON version of the EEO MD-715 PART J that is more comprehensive and guides commands' through the process of establishing a Special Program and Plan for the recruitment, hiring and advancement of IWTD. The draft has been completed and is currently in the chop chain for signature.
- DON hired 6.2% more IWTD in FY 2008 when compared to the previous reporting period.
- The progress toward the achievement of our FY 2008 hiring goal was briefed monthly to the Secretary of the Navy.
- Participation in another successful year in the Workforce Recruitment Program for College Students with Disabilities, culminating in the employment of some students on permanent appointments.
- Involvement of human resources professionals and commitment of senior management officials in addressing the employment issues of IWTD.
- Encouraging and supporting the development of pilot programs designed to increase the participation rate of IWTD in the DON workforce. Although these pilot programs are not yet complete, some successes have already been realized, i.e., a major command that developed a pilot program, with hands on senior level management involvement, was singlehandedly responsible for 17% of the DON IWTD hires in FY 2008. This command attributes their IWTD hiring successes to the pilot program which focused on the identification and elimination of barriers to employment for IWTD. Some of the successful elements of these pilot programs include:
  - Establishing a contract vehicle with Joyce Bender Consulting Services, a company that recruits and places IWTD with the requisite knowledge, skills and abilities for their vacant positions.
  - Focusing on the identification and elimination of employment barriers for IWTD.
  - Garnering support, commitment and involvement of senior leadership for the IWTD Program.
- Ensuring that information is cascaded throughout the DON to include:
  - Dissemination of Schedule A appointment authority information.
  - Publicizing and disseminating relevant information related to IWTD employment issues to the human resources community for their education and further distribution to all levels of the DON organization.
  - Emphasizing the importance of this program with Commanding

	<ul style="list-style-type: none"> <li>○ Officers during DON program validation visits at each command.</li> <li>○ Publicizing contact information for all DON Selective Placement Coordinators.</li> <li>● Recruiting sources include educational institutions and various organizations that are expected to yield a diverse applicant pool that includes IWTD. <ul style="list-style-type: none"> <li>○ Participation in the Veteran's Affairs Vocational Rehabilitation Program Director for the "Coming Home to Work Program". This program allows veterans to remain on active duty while gaining civilian work experience as they transition to civilian life.</li> <li>○ Capitalized the use of available technology and flexibilities to identify and reach IWTD who are not able to attend career fairs or respond quickly to job postings.</li> <li>○ Utilized the Naval Acquisition Internship Programs (NAIP) to ensure the pool of entry-level candidates included IWTD through direct sourcing and interaction with candidates at local and national career fairs.</li> <li>○ Participation in events such as the Wounded Warrior Regiment (WWR) job fair to increase employment opportunities for veterans and IWTD. Resumes collected from the WWR Program Manager were disseminated to selecting officials for their consideration.</li> </ul> </li> </ul>
<p><b>Part V</b></p> <p>Goals for Targeted Disabilities</p>	<p>Agencies with 1,000 or more permanent employees are to use the space provided below to describe the strategies and activities that will be undertaken during the coming fiscal year to maintain a special recruitment program for individuals with targeted disabilities and to establish specific goals for the employment and advancement of such individuals. For these purposes, targeted disabilities may be considered as a group. Agency goals should be set and accomplished in such a manner as will effect measurable progress from the preceding fiscal year. Agencies are encouraged to set a goal for the hiring of individuals with targeted disabilities that is at least as high as the anticipated losses from this group during the next reporting period, with the objective of avoiding a decrease in the total participation rate of employees with disabilities.</p> <p>Goals, objectives and strategies described below should focus on internal as well as external sources of candidates and include discussions of activities undertaken to identify individuals with targeted disabilities who can be (1) hired; (2) placed in such a way as to improve possibilities for career development; and (3) advanced to a position at a higher level or with greater potential than the position currently occupied.</p> <p><b>FY 2009 STRATEGIC PLAN</b></p> <p>Despite some progress, initiatives to increase the participation rate of IWTD have not resulted in much success to date. DON is committed to establishing an effective program that builds on our accomplishments by raising the benchmark for success each succeeding year and developing new initiatives that will enhance our program. The implementation of DON goals, objectives and strategies for IWTD that have the desired results to hire; place individuals in such a way as to improve possibilities for career development; and, advance individuals to a position at a higher level or with greater potential is dependent upon our ability to establish a robust program. Our plan for FY 2009 is to focus our efforts on establishing such a program and to conduct in-depth barrier analysis for the identification of specific barriers. To emphasize the importance of this program, a full-time program manager position at the DON level will be established. The</p>

IWTD Program Manager will be responsible for establishing a solid program structure, developing an effective plan and providing guidance to the commands for implementation.

FY 2009 objective #1: Recruit and fill a DON level PWD Program Manager position to manage this critical program.

FY 2009 objective #2: Update the DON PART J and require all commands to establish a Special Program and Plan for IWTD using this PART for execution in FY 2010.

FY 2009 objective #3: Implement an automated DON-wide tracking and monitoring system for reasonable accommodation requests.

FY 2009 objective #4: Host a DON forum at the annual DoD Perspectives on Employment of Persons with Disabilities Conference.

FY 2009 objective #5: Disseminate the DON Guide for Conducting Effective Barrier Analysis and provide training on barrier analysis.

FY 2009 objective #6: Require commands to conduct a more in-depth analysis than currently conducted to identify the barriers for the employment of IWTD and to develop appropriate barrier elimination plans.

FY 2009 objective #7: Implement a revised DON FEORP Program and Plan that includes recruitment strategies to ensure the diversity of applicant pools to include IWTD.

FY 2009 objective #8: Track, monitor and report results of pilot IWTD programs and share lessons learned.

FY 2009 objective #9: DON has accepted EEOC's goal of 2% participation rate of IWTD. DON EEO professionals will be tasked with taking a leadership role toward the achievement of this goal by:

- Addressing this issue in detail with their Commanding Officers during their assessment briefings.
- Enlisting the commitment and support of their Commanding Officers to obtain management involvement.
- Training all supervisors and managers.
- Ensuring that each command has and implements a plan of action.

Involving all the necessary stakeholders to develop and implement a strong viable plan that will yield incremental successes.

<p>EEOC FORM 715-01 PART H</p>	<p align="center"><i>U.S. Equal Employment Opportunity Commission</i> <b>FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b> EEO Plan to Attain the Essential Elements of a Model EEO Program</p>	
<p><b>Department of the Navy</b></p>		<p><b>FY 2009 PLAN #H-09 (1)</b></p>
<p>STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:</p>	<p>The DON continues to make significant progress in aligning our EEO Program at all levels. However, ongoing efforts are still needed to establish a solid foundation for successful maintenance of a model EEO program. In FY 2009, our plan is to address identified deficiencies in the following essential elements:</p> <p>Essential Element A: Demonstrated Commitment from Agency Leadership</p> <ul style="list-style-type: none"> <li>• Training on reasonable accommodation is not provided consistently at the command/activity level.</li> </ul> <p>Essential Element B: Integration of EEO into the Agency’s Strategic Mission</p> <ul style="list-style-type: none"> <li>• Additional training/guidance for EEO practitioners/supervisors/managers at the command/activity level on EEO program requirements and roles/responsibilities is needed.</li> </ul> <p>Essential Element C: Management and Program Accountability</p> <ul style="list-style-type: none"> <li>• Regular EEO updates are not conducted consistently at the command/activity level.</li> <li>• Barrier analysis efforts at the command/activity level need improvement.</li> </ul> <p>Essential Element D: Proactive Prevention</p> <ul style="list-style-type: none"> <li>• Supervisors/managers at the command/activity level are not consistently involved with barrier analysis efforts.</li> </ul> <p>Essential Element E: Efficiency</p> <ul style="list-style-type: none"> <li>• Current data systems do not meet all requirements and all necessary tracking/monitoring systems have not been implemented.</li> <li>• The timeliness of pre-complaint and formal complaints processing need improvement.</li> </ul>	
<p>OBJECTIVE:</p>	<p><b>1. To provide on-going EEO program training, guidance and communication to EEO practitioners at the command and activity levels. To hold Command and Activity level Deputy EEO Officers accountable for providing regular EEO updates, training, guidance and communication to supervisors/managers.</b></p> <p><b>2. To improve barrier analysis efforts at the command/activity level and to ensure that supervisors/managers are involved in these efforts.</b></p> <p><b>3. To enhance current data systems and to develop necessary tracking/monitoring systems.</b></p> <p><b>4. To improve the timeliness and quality of pre-complaint and formal complaint processing.</b></p>	
<p>RESPONSIBLE OFFICIAL:</p>	<p>DON EEO Program Director, DON EEO staff, Deputy EEO Officers at the command level (CDEEOO), Deputy EEO Officers at the activity level (DEEOO), DON Office of Civilian Human</p>	

	Resources (OCHR) HR Policy and Programs Department, DON OCHR HR Operations and Systems Department, DON managers/supervisors at all levels
DATE OBJECTIVE INITIATED:	October 1, 2008
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2009
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
<p>1. Provide EEO program training, guidance and communication to EEO practitioners/managers/supervisors:</p> <p>a. Issue and disseminate Barrier Analysis Civilian Human Resources Manual (CHRM). <u>Target Date:</u> January 2009, <u>Action Officer:</u> DON EEO Office</p> <p>(1) Disseminate Barrier Analysis CHRM at command and activity levels. <u>Target Date:</u> April 2009, <u>Action Officer:</u> CDEEOOs, DEEOOs</p> <p>b. Issue and disseminate EEO Program Assessments CHRM <u>Target Date:</u> December 2008, <u>Action Officer:</u> DON EEO Office</p> <p>(1) Disseminate Assessments CHRM at command and activity levels. <u>Target Date:</u> April 2009, <u>Action Officer:</u> CDEEOOs, DEEOOs</p> <p>c. Implement DON Assessment Program. <u>Target Date:</u> December 2008, <u>Action Officer:</u> DON EEO Office</p> <p>(1) Implement applicable components of DON Assessment Program at command and activity levels. <u>Target Date:</u> June 2009, <u>Action Officer:</u> CDEEEO, DEEEO</p> <p>d. Develop reasonable accommodation training outline for further development and deployment at the command/activity levels. <u>Target Date:</u> June 2009, <u>Action Officer:</u> DON EEO Office</p> <p>(1) Submission of command plans and schedule to further develop and deploy reasonable accommodation training. <u>Target Date:</u> August 2009, <u>Action Officer:</u> CDEEOOs</p> <p>(2) Submission of activity plans and schedule to deploy reasonable accommodation training. <u>Target Date:</u> Date established by CDEEEO to meet DON target date, <u>Action Officer:</u> DEEEO</p> <p>e. Implement improvements to EEO for HR Professionals training course and schedule additional offerings. <u>Target Date:</u> November/December 2008, <u>Action Officer:</u> DON EEO Office, Civilian Workforce Development Division</p>	September 2009 (specific target dates and action officers identified with individual planned activities)

<p>f. Schedule Advanced EEO Counselor training course. <u>Target Date:</u> December 2008, February 2009, April 2009, August 2009, <u>Action Officer:</u> DON EEO Office</p> <p>g. HR Conference – focus on EEO professionals’ personal development. <u>Target Date:</u> April 2009, <u>Action Officer:</u> DON EEO Office, OCHR HR Policy and Programs Department</p> <p>h. Submission of command plans and schedules to provide regular EEO updates to senior leadership/managers/supervisors. <u>Target Date:</u> July 2009, <u>Action Officer:</u> CDEEOOs</p> <p>(1) Submission of activity plans and schedule to provide regular EEO updates to senior leadership/managers/supervisors. <u>Target Date:</u> Date established by CDEEOO to meet DON target date, <u>Action Officer:</u> DEEOOs</p>	
<p>2. Focus barrier analysis efforts at the command level to ensure that in-depth analysis is conducted and supervisors/managers are involved in these endeavors.</p> <p>a. Develop and schedule barrier analysis training course. <u>Target Date:</u> August 2009, <u>Action Officer:</u> DON EEO Office</p> <p>(1) Provide plan to provide barrier analysis training at the activity level. <u>Target Date:</u> September 2009, <u>Action Officer:</u> CDEEOOs</p> <p>b. Submission of command time-tables or schedules to review Merit Promotion, Awards Program, and Employee Development programs for any systemic barriers. <u>Target Date:</u> July 2009, <u>Action Officer:</u> CDEEOOs</p> <p>(1) Submission of activity time-tables or schedules to review Merit Promotion, Awards Program, and Employee Development programs for any systemic barriers. <u>Target Date:</u> Date established by CDEEOO to meet DON target date, <u>Action Officer:</u> DEEOOs</p> <p>c. Submission of command plans and schedules to conduct trend analysis, by ERI and disability, of effects of management/personnel policies, practices and procedures. <u>Target Date:</u> July 2009, <u>Action Officer:</u> CDEEOOs</p> <p>(1) Submission of activity plans and schedules to conduct trend analysis, by ERI and disability, of effects of management/personnel policies, practices and procedures. <u>Target Date:</u> Date established by CDEEOO to meet DON target date, <u>Action Officer:</u> DEEOOs</p> <p>d. Submission of command plans to involve managers/supervisors in barrier analysis efforts. <u>Target Date:</u> July 2009, <u>Action Officer:</u> CDEEOOs</p> <p>(1) Submission of activity plans to involve managers/supervisors in barrier analysis efforts. <u>Target Date:</u> Date established by</p>	<p>September 2009 (specific target dates and action officers provided with individual planned activities)</p>

<p>CDEEOO to meet DON target date, <u>Action Officer:</u> DEEOOs</p>	
<p>3. Enhance current data systems and to develop necessary tracking/monitoring systems.</p> <p>a. Implement reporting capabilities improvements for DON Affirmative Employment Program Reporting Tool. <u>Target Date:</u> February-September 2009, <u>Action Officer:</u> DON EEO Office, HR Data Management Branch</p> <p>b. Implement an automated agency-wide tracking system to track and monitor reasonable accommodation requests. <u>Target Date:</u> September 2009, <u>Action Officer:</u> DON EEO Office, HR Data Management Branch</p> <p>c. Implement eVersity, an automated data reporting tool, for use in barrier/trend analysis and MD-715 reporting purposes. <u>Target Date:</u> July 2009, <u>Action Officer:</u> DON EEO Office, HR Data Management Branch</p>	<p>September 2009 (specific target dates and action officers provided with individual planned activities)</p>
<p>4. To improve the timeliness and quality of pre-complaint and formal complaint processing by servicing EEO offices.</p> <p>a. DON will continue its oversight of cases at the pre-complaint and formal stages to monitor timeliness. Guidance to command/servicing offices will be provided as needed. <u>Target Date:</u> January 2009; <u>Action Officer:</u> DON EEO Office</p> <p>(1) Require commands to track, monitor and implement improvements, where applicable, for the timely processing of cases at the pre-complaint and formal stages. <u>Target Date:</u> April 2009; <u>Action Officer:</u> DON EEO Office, CDEEOOs</p> <p>b. Review and clarify current investigation guidelines with the Department of Defense, Investigations and Resolution Division. Update current DON procedures, if necessary. <u>Target Date:</u> August 2009, <u>Action Officer:</u> DON EEO</p>	<p>September 2009 (specific target dates and action officers provided with individual planned activities)</p>
<p>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:</p>	
<p></p>	

**Department of the Navy**

**FY 2009 PLAN #H-09 (2)**

STATEMENT of  
MODEL PROGRAM  
ESSENTIAL ELEMENT  
DEFICIENCY:

The DON continues to make significant progress in aligning our EEO Program at all levels. However, the goal to establish and maintain a model EEO program is hindered by the inconsistent application of roles and responsibilities within the HR/EEO community, impacting the level of services provided to over 75% of the DON. This model has resulted in deficiencies in the following essential elements:

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

- The inconsistent application of roles and responsibilities within the HR/EEO community has negatively impacted the effectiveness of the DON EEO program.

Essential Element C: Management and Program Accountability

- As a result of the inconsistent application of roles and responsibilities within the HR/EEO community, regular EEO updates are not provided consistently at the command/activity levels.
- As a result of the inconsistent application of roles and responsibilities within the HR/EEO community, barrier analysis efforts at the command/activity levels need improvement.

OBJECTIVE:

**To influence change in the application of roles and responsibilities within the HR/EEO community and to require commands to develop alternatives for delivering the quality of EEO services that will result in a model EEO program that ensures equality of opportunity for all employees and fosters an inclusive work environment.**

RESPONSIBLE  
OFFICIAL:

DON senior leadership, Commanding Officers, DON Office of EEO and Diversity Management Program Director, Command Deputy EEO Officers, Deputy EEO Officers at the activity level

DATE OBJECTIVE  
INITIATED:

October 1, 2008

TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2009	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)	
1. Ensure that this issue remains at the forefront of senior level leadership's attention and to influence a positive outcome.	30 September 2009	
2. Clarification of the roles and responsibilities of HR/EEO service providers.	30 September 2009	
3. Hold commands impacted by the HR/EEO service delivery model accountable for developing alternative solutions and to keep DON informed of the outcomes.	30 September 2009	
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:		

**Department of the Navy**

**FY 2009 PLAN #I-09**

**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?

A low participation rate of Asian males and females in the YA/YC-3, and equivalent grade levels, and above.

Asian males and females participate in the overall DON workforce at a rate significantly above their representation in the NCLF, 6.37% and 5.05% respectively, compared to a NCLF of 1.90% and 1.70%.

However, a review of Asian males and females in the different DON pay systems (GS, NSPS, demos) indicate that these groups' participation rate in the higher grade levels is much lower than expected given their overall participation rate in the DON work force.

**BARRIER ANALYSIS:**

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

The data in EEOC Workforce Data Tables A1 and A4 was reviewed. A trigger for a possible barrier was identified when this groups' participation rate in the overall work force was compared to their participation rate in the high grades. Although these groups enjoyed a high participation rate in the overall work force, their participation rates in the high grades were not commensurate.

A review of the participation rates in the pipeline grade levels for these groups indicate good participation rates until the higher grade levels were examined. In the high grades, the participation rates of these groups dropped significantly when compared to their participation rates in the pipeline grades and their participation in the overall work force.

Additional information is required in order to determine the cause of this condition.

<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>The information required to conduct an in-depth barrier analysis to pinpoint the specific barrier(s) is not available at the DON level, e.g., promotion practices, policies and procedures at the command/activity levels; applicant flow data, etc.</p> <p>Commands/activities will be tasked with conducting a more in-depth barrier analysis.</p>
<p><b>OBJECTIVE:</b></p> <p>State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p><b>To determine if there are any barriers to EEO for Asian males and females for progression to the higher grade levels. If any barriers are uncovered, appropriate barrier elimination plans will be developed and implemented.</b></p>
<p><b>RESPONSIBLE OFFICIAL:</b></p>	<p>DON EEO Program Director, DON EEO staff, CDEEOOs, DEEOOs, HROs, hiring officials</p>
<p><b>DATE OBJECTIVE INITIATED:</b></p>	<p>February 2009</p>
<p><b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b></p>	<p>August 2009</p>

<p><b>EEOC FORM 715-01 PART I</b></p>	<p><b>EEO Plan To Eliminate Identified Barrier</b></p>	
<p><b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b></p>	<p><b>TARGET DATE (Must be specific)</b></p>	
<p>1. Commands/activities will conduct an in-depth barrier analysis into this identified trigger and report their findings to the DON. If barrier(s) are identified, commands/activities will be required to develop and report appropriate EEO Plans in their FY 2009 Annual Report for execution in FY 2010.</p>	<p>August 2009</p>	
<p>2. Command/activity EEO updates to senior leadership and supervisors/managers will include information on this EEO Plan.</p>	<p>September 2009</p>	
<p><b>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE</b></p>		