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**AMERICA'S ARMY:**  
**THE STRENGTH OF THE NATION™**  
**U.S. DEPARTMENT OF THE ARMY**

**Diversity and Leadership Roundtable Discussion**  
**PRAXIS: Integration of Diversity and MD 715**

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# ROUNDTABLE – MD 715



## EEOC MD-715

- Developed by EEO Commission
- Effective October 1, 2003
- EEO responsibilities under Section 717 of Title VII and Section 501 of the Rehabilitation Act
- Directive provides policy guidance and standards for establishing & maintaining affirmative programs of EEO



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## EEOC MD-715

### Historical Perspective

EEOC MD(s) 712, 713, 714  
Statistical Parity  
Separate Reporting  
Focus on Minorities & Women  
Annual Updates and Analysis  
PATCOB (Job Categories)  
RNO (Race National Origin)

### 21<sup>st</sup> Century

EEOC MD 715  
Diagnostic Barrier Analysis  
Consolidated Reporting  
Focus on All Employees  
Self Assessment  
FED 9 (Job Categories)  
ERI (Ethnicity Race Identification)



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<b>Six Essential Elements of a Model EEO Program</b>	<b>Percent Compliant FY 10</b>	<b>Percent Compliant FY 11</b>
Demonstrated Commitment from Agency Leadership	89%	95%
Integration of EEO into the Agency's Strategic Mission	97%	97%
Management and Program Accountability	100%	100%
Proactive Prevention of Unlawful Discrimination	100%	100%
Efficiency	97%	97%
Responsiveness and Legal Compliance	100%	100%
Army Part G Dashboard Summary Score (Average Score)	97%	98%

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## Affirmative Employment is “NOT”

- Hard and fast quotas
- Preference for unqualified individuals
- Mandatory selection of specific candidates
- An infringement upon the rights of other employees



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## EEO MD-715 Policy Intent

Objective is to ensure that all employees and applicants for employment enjoy equality of opportunity in the federal workplace regardless of race, sex, national origin, color, religion, age, genetic information, disability or reprisal for engaging in prior protected activity.



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## What does MD-715 require?

- A Model EEO Program
- All employment decisions are free from discrimination
- Analyze whether employment policies, procedures or practices are barriers to equal opportunity
- Correct identified barriers to equal opportunity
- Report plans and progress to EEOC annually



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## What is a barrier?

A policy, procedure, practice or condition that limits employment opportunities for employees or applicants because they are members of a particular race, ethnic background, sex or because of a disability



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## Types of Barriers

- Attitudinal
- Structural
- Recruitment Practices
- Selection Process
- Geographic Location of Agency
- Reputation of Agency
- Ineffective Reasonable Accommodation Program
- Overly Restrictive Position Description
- Security Clearance Process
- Employee Development Practices
- Award Process
- Other



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## What is a Trigger?

Any piece of information (a statistical anomaly from work force data tables, a trend in complaints, a rash or resignations, etc.) that alerts an EEO professional that additional scrutiny of the area where the trigger occurred is warranted. Agencies must investigate triggers to determine whether actual barriers are at work.

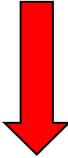


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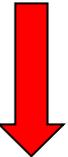


## Department of the Army Civilian Workforce Posture FY 2011

### Females

	Number	Percentage	
Army	116,320	40.49%	
National Civilian Labor Force		<b>46.80%</b>	

### Hispanics

Army	14,129	4.91%	
National Civilian Labor Force		<b>10.70%</b>	

### Targeted Disabilities

Army	1,736	.60%	
Federal and DoD Goal		<b>2.00%</b>	



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## How is a barrier Identified?

- Analyzing workforce statistics as an initial diagnostic tool which is an incomplete picture of the state of our workforce
- Reviewing EEO Complaints and grievances etc., for trends
- Conducting focus groups
- Speaking to stakeholders (Hiring Managers, Union Officials, HR practitioners, Special Emphasis Program Managers)
- Reviewing studies and employment practices with HR officials
- Reviewing existing workforce studies resources, e.g., Employee Surveys, Exit Interview data etc.
- Investigating to pinpoint root cause of potential barrier



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## How is a Barrier Addressed?

- Part I of the Federal Agency Annual EEO Program Status Report
- Devising and implementing a strategic plan to eliminate the barrier
- Evaluating success of plans implemented
- Determining if plans need to be adjusted or if new or additional barriers exist



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## Responsible Officials for Identifying and Eliminating Barriers

- EEO Practitioners
- Human Resource Officials
- Hiring Managers and Supervisors
- Special Emphasis Program Managers



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## Overview of the Barrier Analysis Process

- Identify triggers
- Investigate potential barriers
- Be focused and methodical
- Involve all key officials in the process
- Devise action plans
- Think outside the box
- Assign responsibility for barrier removal
- Assess results through follow-up



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## Barrier Identification and Elimination Process At-A-Glance

### Step One:

- Identify Possible Barriers Using a Variety of Sources:
- Take, review and refine compulsory snapshots
- Take additional snapshots where needed
- Review other information sources
- Analyze ALL employment processes



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## Barrier Identification and Elimination Process At-A-Glance (Continued)

### Step Two:

- Investigate to Pinpoint Actual Barriers and Causes:
- With workforce data, determine appropriate benchmarks, compare rates, and note net changes
- Heed triggers from other sources
- Pinpoint barriers and determine causes



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## Barrier Identification and Elimination Process At-A-Glance (Continued)

### Step Three:

- Barrier Elimination:
- Devise a plan to address barrier causes
- Determine whether barriers are job-related and consistent with business necessity. If not, plan to eliminate those barriers.
- Consider modifications even where barriers are job-related and consistent with business necessity.
- Report plan and progress to the EEOC annually



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## Barrier Identification and Elimination Process At-A-Glance (Continued)

### Step Four:

- Assess Success of Plan:
- Track Progress; should be measurable
- Hold agency officials accountable
- Periodic re-assessments should be done to discover if plan needs adjusting



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## Indicators

- Increase in Quality Applications
- Separation Rates
- EEO Complaints
- Survey Results
- Exit Interviews
- Productivity



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**QUESTIONS?**