

DEPARTMENT OF THE NAVY
CIVILIAN HUMAN RESOURCES MANUAL

SUBCHAPTER 1603

EQUAL EMPLOYMENT OPPORTUNITY PROGRAM ASSESSMENTS

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Department of the Navy

EQUAL EMPLOYMENT OPPORTUNITY PROGRAM ASSESSMENTS

SUBCHAPTER 1603

- References:**
- (a) 29 CFR Part 1614 of 9 November 1999
 - (b) Americans with Disabilities Act of 1990, as amended
 - (c) Rehabilitation Act of 1973, as amended
 - (d) Age Discrimination in Employment Act of 1967 (ADEA)
 - (e) Equal Pay Act of 1963
 - (f) EEOC Management Directive 715 of 1 October 2003
 - (g) EEOC Management Directive 110 of 9 November 1999
 - (h) Civilian Human Resource Manual Subchapter 1601
 - (i) Civilian Human Resource Manual Subchapter 1614.1
 - (j) SECNAVINST 5430.57G of 29 December 2005
 - (k) SECNAVINST 12250.6 of 22 January 2003
 - (l) SECNAVINST 5040.3A of 13 July 2000
 - (m) SECNAVINST 12273.1 of 16 March 1999

1. Purpose. This Subchapter establishes policy guidance and assigns responsibility for the effective assessment and evaluation of the Equal Employment Opportunity (EEO) Program within the Department of the Navy (DON).

2. Policy. DON major commands and subordinate activities shall conduct regular internal assessments to evaluate the effectiveness and efficiency of their Title VII and Rehabilitation Act programs and to ascertain command and activity efforts in identifying and removal of barriers to equality of opportunity in the workplace.

3. Background.

a. In accordance with references (a) through (i), DON requires its major commands and subordinate activities to implement the elements necessary to create and maintain a model EEO Program and provide equality of opportunity to all DON employees and applicants.

b. DON shall maintain effective systems for assessing and evaluating its EEO programs to ensure DON major commands and subordinate activities implement an EEO program in support of and in alignment with the overall DON EEO Program strategic goals and objectives.

c. On-going assessments of major command and subordinate activity EEO programs are vital to maintain the highest level of effectiveness and efficiency. References (a) through (m) establish the requirement to evaluate DON organizations and functions, including EEO programs, through an annual self-assessment, a DON-level assessment of major commands, major commands' assessment of subordinate activities, a DON-level assessment of activities and servicing EEO offices, Civilian Human Capital Management Assessment Program evaluations and Navy Inspector General (NAVINSGEN) inspections.

4. Types of DON EEO Program Assessment.

a. Annual Self-Assessment. An ongoing obligation for DON major commands and subordinate activities, in compliance with reference (f), to assess, evaluate and monitor the effectiveness of its EEO programs and to identify and eliminate barriers that impede free and open competition in the workplace to ensure that all employees and applicants for employment enjoy equal opportunity in the federal workplace regardless of race, sex, national origin, color, religion, disability or reprisal for engaging in prior protected activity.

b. DON Assessment and Validation Visits to Major Commands. A top-level assessment by the Office of EEO and Diversity Management on the overall effectiveness of the major command's EEO program and validation of self-assessment efforts in accordance with reference (f).

c. Major Command Assessment of Subordinate Activities. A full review by the major command of its subordinate activities' EEO programs to ascertain the effective implementation and management of EEO programs and validation of self-assessment efforts per reference (f).

d. Special Review of Activity Level EEO Program. A more in-depth review by the Office of EEO and Diversity Management of the activity level and/or servicing EEO offices' EEO program and their efforts to identify and eliminate any barriers that impede free and open competition in the workplace to ensure compliance with reference (f). This assessment will be conducted on an as needed basis and will involve the appropriate major command(s).

e. Civilian Human Capital Management Assessment Program. An assessment of the Civilian Human Capital Management (HCM) Program to include both Human Capital Management and EEO, in accordance with reference (m), to improve and maintain efficiency, productivity, and mission accomplishment of DON activities and commands.

f. Navy Inspector General (NAVINSGEN) Inspection. DON-level and command-level inspections, investigations, assessments or inquiries as required by references (j) and (l) into any and all matters of importance to DON/commands with particular emphasis on readiness, including but not limited to: effectiveness, efficiency, discipline, morale, economy, ethics and integrity, environmental protection, safety and occupational health, medical and dental matters, physical security; information systems management, personnel support services and other issues affecting quality of life, command relationships, and organizational structures.

5. Applicability. This Subchapter applies to all DON major commands and subordinate activities.

6. Responsibilities.

a. The Assistant Secretary of the Navy (ASN) Manpower and Reserve Affairs (M&RA) has overall responsibility for assessment and evaluation of the DON EEO Program.

b. The Deputy Assistant Secretary of the Navy (DASN) Civilian Human Resources (CHR) is responsible for management and administration of the DON EEO Program assessment and evaluation, and shall:

(1) Ensure assessment policy and procedures are developed, established and implemented.

(2) Direct and ascertain compliance with established policy and procedures.

c. The Program Director for DON EEO & Diversity Management oversees the effective implementation of the DON EEO Program assessment process and shall:

(1) Develop and establish assessment policy and procedures.

(2) Ensure DON policy on effective program assessment is understood and implemented by all DON major commands and subordinate activities.

(3) Direct, coordinate and consolidate DON-wide efforts to assess the EEO Program and report the state of the health of the DON EEO Program.

(4) Conduct a self-assessment of the overall DON EEO Program, on at least an annual basis, and a review of the Annual EEO Program Status Report submissions from the major commands to ensure that an effective assessment of the major command and subordinate activity EEO Programs were accomplished.

(5) Conduct on-site validations at the major command level to determine the overall effectiveness of the program and to ensure that EEO Program self-assessments are accomplished as reported in Annual EEO Program Status Report submissions.

(6) Conduct special review visits, as necessary, at the activity and servicing EEO offices to address identified problems/issues.

(7) Prepare and submit the DON Annual EEO Program Status Report to Department of Defense (DoD) and Equal Employment Opportunity Commission (EEOC), as required.

(8) Regularly brief the EEO Director and senior leaders on the status of the DON EEO Program.

d. Command Equal Employment Opportunity Officer (CEEEO). The Commander is the CEEEO and is responsible for ensuring that his/her senior leadership and supervisors implement and practice EEO principles and that all efforts are exerted to regularly evaluate the EEO Program. As such, the CEEEO will:

(1) Ensure this policy is disseminated and implemented command-wide.

(2) Direct annual and periodic assessments on the EEO program in accordance with Sections 1 and 3 of this Subchapter.

(3) Provide necessary support, resources and information to comply with the requirements of this Subchapter.

(4) Ensure full cooperation of all personnel during assessments and on-site validation visits.

(5) Ensure compliance with all requirements of this Subchapter.

e. Command Deputy Equal Employment Opportunity Officer (CDEEEO). The CDEEEO will:

(1) Effect compliance with all requirements of this Subchapter.

(2) Conduct annual and periodic assessments of subordinate activities' EEO programs in accordance with this Subchapter.

(3) Regularly brief the CEEEO and senior leadership regarding the status of the Command's EEO Program.

(4) Provide necessary support, resources and information to comply with the requirements of this Subchapter.

f. Equal Employment Opportunity Officer (EEEO). The Activity Commander or Head is the EEEO and is responsible for the implementation and assessment of the EEO Program. As such, she/he will:

(1) Ensure this policy is disseminated and implemented activity-wide.

(2) Direct annual and periodic assessments on the EEO program in accordance with Section 1 of this Subchapter.

(3) Provide necessary support, resources and information to comply with the requirements of this Subchapter.

(4) Ensure full cooperation of all personnel during assessments and on-site validation visits.

(5) Ensure compliance with the requirements of this Subchapter.

g. Deputy Equal Employment Opportunity Officer (DEEEO). The DEEEO will:

(1) Effect compliance with the requirements of this Subchapter.

(2) Establish and maintain a continuing EEO program and conduct a self-assessment of serviced activities' EEO programs in accordance with this Subchapter and reference (f).

(3) Report results of self-assessment and barrier analysis efforts to the appropriate major command.

(4) Provide necessary support, resources and information to comply with the requirements of this Subchapter.

(5) Regularly brief the serviced activities' EEOO and senior leadership on the status of their EEO Program.

7. Action. All DON major commands and subordinate activities will comply with the requirements of this Subchapter.

**EQUAL EMPLOYMENT OPPORTUNITY PROGRAM ASSESSMENTS
GUIDE FOR SUBCHAPTER 1603**

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DON EEO PROGRAM ASSESSMENTS

SECTION 1

COMMAND/ACTIVITY LEVEL EEO PROGRAM SELF-ASSESSMENT REQUIREMENTS

I. PURPOSE: This document outlines the requirements and procedures for all DON major commands and subordinate activities to conduct an earnest and objective assessment of their on-going efforts to establish and maintain effective affirmative programs of equal employment opportunity under Section 717 of Title VII and effective affirmative action programs under Section 501 of the Rehabilitation Act as required by reference (f).

A. Goal of an Inclusive Work Environment: It is important to emphasize that creating a solid infrastructure for the DON EEO Program at all levels is necessary to achieve our goal of a discrimination free work environment that is characterized by an atmosphere of inclusion and free and open competition for employment opportunities. Therefore, it is critical and a requirement that all DON commands/activities initially focus their efforts to establish a model EEO program, as outlined in reference (f), and then, more importantly, after it has been established, to sustain those efforts on an on-going basis.

B. Report of Efforts to Accomplish Goal of an Inclusive Work Environment: The purpose of a self-assessment is not to produce a report. A self-assessment provides direction and focus for the EEO Program at all levels while the resultant report is merely a snapshot of the on-going efforts and accomplishments toward the achievement of an inclusive work environment at a particular point in time. If there are no on-going program efforts, there is nothing to report. These self-assessments are critical to the DON's efforts to: establish and maintain a model EEO program; identify barriers that are common to DON; implement the DON's plan of action to eliminate any identified barriers; and effectively execute the agency's Special Program Plan for the Recruitment, Hiring and Advancement of Individuals with Targeted Disabilities Program and Hispanic Employment Program.

II. ASSESSMENT RESPONSIBILITY: It is the collaborative responsibility of all managers, supervisors, HR practitioners, EEO practitioners, and any other designated individuals to conduct the self-assessments described in this section.

III. SELF-ASSESSMENT OF THE EEO PROGRAM:

A. There are two aspects of an EEO Program that must be addressed during a self-assessment at all levels:

1. The first element is a self-assessment of the command's/activity's EEO program measured against the six essential elements of a model EEO program using the EEOC Agency Self-Assessment Checklist provided in reference (f). More detailed information and a copy of the checklist, EEOC Form 715-01, Part G, may be obtained from the EEOC website at http://www.eeoc.gov/federal/715instruct/part_g.html.

a. This checklist provides an efficient and effective means for each command/activity to determine, on at least an annual basis, whether its overall EEO Program is properly established and compliant with the six essential elements of a model EEO program. The Checklist is not just an annual reporting requirement to be completed at the end of each fiscal year. Each command/activity is expected to establish and manage an on-going and effective EEO Program. Proactively managing an effective EEO Program involves a conscious effort to continuously improve the DON's EEO posture. The integration of access, inclusion and equality of opportunity into all aspects of the mission and aligning equal opportunity principles with strategic agency plans and objectives will provide the infrastructure necessary for DON to achieve the goal of a discrimination free work environment. The completion of the Checklist serves as an opportunity to annually conduct a baseline review of the EEO Program at all levels to identify program deficiencies, develop planned activities for achieving a model EEO program, and to determine progress towards the goal of establishing and maintaining an inclusive work environment that provides equal employment opportunities to all employees.

b. Every command and activity with 50 or more employees is required to complete the Self-Assessment Checklist at the end of each fiscal year. It is recommended that each activity review the Checklist in its entirety and determine the appropriate responsible party(ies) to respond to each question well before the submission date designated by its major command. An activity's servicing EEO Office is responsible for consolidating all the Checklist responses for the Commanding Officer's approval and signature. Checklists will be submitted to the activity's major command annually. Major commands are responsible for establishing due dates and consolidating subordinate activity checklists into a single self-assessment of the entire command's EEO Program for submission to the DON Office of EEO and Diversity Management as part of the command's annual report.

c. Supporting documentation for "yes" responses must be maintained and made available upon request by the activity's command, DON, and/or EEOC officials. Commands/activities are not required to submit supporting documentation with their completed Checklists unless specifically requested to do so, but should retain it. Inspector General (IG) inspections, validation, and/or special reviews will include the review of supporting documentation for command/activity responses to the Checklist.

d. If a command/activity responds in the negative to a question(s) on the Checklist, the following actions are required:

(1) A negative response is indicative of an area(s) that requires improvement for the command/activity to attain the goal of a model EEO program and requires the development of an EEO Plan to Attain the Essential Elements of a Model EEO Program, EEOC Form 715-01, Part H. A copy of Part H may be found on the EEOC website at <http://www.eeoc.gov/federal/715instruct/forms.html>

(a) Negative responses should be reviewed for commonality to determine if the development of a single Part H is sufficient to address the areas identified for correction or improvement rather than many individual ones. If there is no

commonality, the command/activity will complete a Part H for each area identified for correction or improvement.

(b) Section III of reference (f) provides instructions for completing these EEO Plans. Commands/activities should document their accomplishments for each objective as soon as a planned activity is completed and not wait until the end of the fiscal year. In certain circumstances, modifications of a stated objective may be warranted during the year. In this event, a brief explanation of why the objective was modified should be provided and a review of applicable planned activities to determine whether or not modification to these activities is also required. Target dates should be adjusted accordingly.

(c) The Part H form is used specifically to report plans of action aimed at correcting identified deficiencies in a command's/activity's EEO program. An assessment of a command's/activity's barrier identification and elimination efforts is the second requirement of the self-assessment process. The results of this self-assessment, i.e., plans to eliminate identified barriers, should be reported on EEOC Form 715-01 Part I, EEO Plan to Eliminate Identified Barrier.

(2) In the event a Checklist question(s) is not applicable to a command's/activity's assessment of its EEO Program, in accordance with EEOC Instructions, the Checklist should be marked "No" and an explanation must then be provided in the comments section.

2. The second element of the self-assessment process provides a snapshot of the status of command/activity efforts to identify and eliminate any barriers to EEO. Barrier identification and elimination is the process by which commands/activities uncover, examine and remove barriers to equal participation at all levels of the workforce. A barrier is an agency policy, principle or practice that limits or tends to limit employment opportunities for members of a particular sex, race, or ethnic background, or based on an individual's disability status. Section II of reference (f) and the DON Barrier Analysis Civilian Human Resources Manual (CHRM) provide more specific guidance on how to conduct an effective barrier analysis. Commands/activities must read these references before initiating barrier analysis efforts to ensure their analyses are focused, meaningful and sufficiently in-depth in order to result in the accurate identification and pinpointing of any barriers to EEO.

a. Activities will conduct this analysis on a quarterly basis as part of their on-going effort to identify and eliminate any potential barriers in their employment programs, policies and procedures.

(1) The first step of the barrier analysis process is to look at the workforce racial, national origin, gender and disability profiles. To assist in this first step, EEOC has developed 28 Workforce Data Tables. While the EEOC Workforce Data Tables are merely one source of data to be reviewed in this process, if completed properly, they will help to identify triggers to be explored. A trigger is an identified problem area that may indicate the existence of a potential barrier to EEO. As the command/activity performs its review of their completed Workforce Data Tables, a trigger for a potential barrier will typically manifest itself through the

identification of low participation rates of a particular group when compared to the Relevant Civilian Labor Force (RCLF). Guidance for completing the EEOC Workforce Data Tables and copies of blank table forms may be found at

<http://www.eeoc.gov/federal/715instruct/datatables.html> and

<http://www.eeoc.gov/federal/715instruct/tables.html>, respectively.

(2) A thorough review will include the analysis of all employment processes, i.e., recruitment, hiring and placement, employee development and training opportunities, promotions and other internal selections, award distribution, discipline and separations and discrimination complaint activity, its trends and impact upon employment processes. Section II of reference (f) identifies these employment processes as areas where barriers to EEO typically arise and also provides a list of questions to be answered by the command/activity as part of its thorough investigation into each of these processes.

b. After the command/activity has analyzed all available source materials, followed clues to pinpoint potential barriers, conducted thorough investigations of these potential barriers, and identified specific barriers, the next step is to plan for improvement by developing overall objectives for barrier elimination, with corresponding action items, identify responsible personnel and target completion dates. The command/activity plan will be documented on EEOC Form 715-01 Part I (Part I). A blank copy of this form may be found at <http://www.eeoc.gov/federal/715instruct/forms.html>.

(1) As a result of the barrier analysis efforts, several potential barriers may be identified. Rather than preparing and submitting an unrealistic number of EEO Plans (Part I), the command/activity should prioritize the identified problem areas and focus on making incremental, but meaningful progress on their more significant problem areas. It is recommended that the command/activity develop no more than three to five EEO Plans (Part I) to reflect what they expect to accomplish within the next reporting period. When EEO Plans are closed out and/or if there is a change in priority, a new EEO Plan should be prepared and submitted for the remaining identified problem areas.

(2) Commands/activities should document their accomplishments for each objective as soon as a planned activity is completed and not wait till the end of the fiscal year. In certain circumstances modifications of a stated objective may be warranted at a later date. In this event, a brief explanation of why the objective was modified should be provided and a review of applicable planned activities to determine whether or not modification to these activities is also required. Target dates should be adjusted accordingly.

(3) A trigger is merely an indication of a potential problem area and the first step of the analysis process. After a trigger has been identified the command/activity must follow clues to pinpoint potential barriers and conduct a thorough investigation of potential barriers before it can be concluded that a specific employment policy, practice or procedure is the barrier of the undesired condition. For example, a table that shows low participation of Hispanic females in the 855 series does not necessarily indicate a need for more aggressive recruitment efforts. Further analysis may show an applicant pool with a large

number of Hispanic female candidates already exists. What at first glance appears to be a recruitment problem might actually be a selection process issue.

c. It must be emphasized that the barrier identification and removal process is a continuous, evolving process. These efforts must be on-going throughout each reporting period in order for the DON to achieve the goal of a discrimination free work environment that is characterized by an atmosphere of inclusion and free and open competition for employment opportunities.

d. Section 501 of the Rehabilitation Act of 1973, as amended, requires federal agencies to take proactive steps to provide equal opportunity to qualified individuals with disabilities in all aspects of federal employment. Reference (f) further states that agencies must regularly evaluate their employment practices to identify barriers to equality of opportunity for individuals with disabilities.

(1) Congress anticipated that the federal government, as a model employer of individuals with disabilities, would take additional steps to include individuals with disabilities at all levels of the federal workforce. As a result, reference (f) directs agencies with 1,000 employees or more (in DON this requirement applies to all commands and activities with 500 or more employees) to maintain a special recruitment program for individuals with targeted disabilities and to establish specific goals for the employment and advancement of such individuals.

(2) There is no applicable RCLF data for individuals with targeted disabilities to use as a benchmark. Rather, a goal for the federal government, and subsequently DON's goal, has been set that individuals with targeted disabilities represent 2% of the workforce.

(3) A command/activity must conduct a self-assessment of its efforts on a quarterly basis to determine how well it is meeting its responsibility to provide employment opportunities for qualified applicants and employees with disabilities, especially those with targeted disabilities. Commands/activities will document their self-assessment efforts in the format prescribed by DON. A blank copy of the report form and instructions for the DON Annual EEO Program Status Report, Special Program Plan for the Recruitment, Hiring and Advancement of Individuals with Targeted Disabilities, is provided (Attachment 1). Do not use the EEOC Part J format for completing this part of the self-assessment process.

e. SECNAVINST 12720.8, Department of the Navy Civilian Hispanic Employment Program, directed that all echelon 1 and 2 commands develop plans and issue guidance to their subordinate activities for addressing the low participation rate of Hispanics.

(1) Major commands and their subordinate activities must conduct a self-assessment on a quarterly basis to determine progress in maintaining the command's program for the recruitment and development of Hispanic employees across all career fields and at all grade levels.

(2) Major Commands and their subordinate activities will document their self-assessment efforts and progress. As this is a DON-unique reporting requirement of the annual self assessment, there is no equivalent EEOC form to use. A blank copy of the required format and instructions for completing the DON Hispanic Employment Program Annual Status Report is provided (Attachment 2).

B. DON Annual EEO Program Status Reporting Requirements: All commands/activities must report annually on the status of the activities undertaken to implement their EEO Program under Title VII and activities taken to implement their affirmative action obligations under the Rehabilitation Act to the Office of EEO and Diversity Management. EEOC instructions for completing this report and blank report forms may be found at <http://www.eeoc.gov/federal/715instruct/index.html>. DON-specific reporting requirements are outlined below:

1. Reporting Deadlines: The DON must submit an Annual EEO Program Status Report to the EEOC on or before January 31st following the end of the fiscal year that is being reported. Therefore, all major commands must submit their Annual EEO Program Status Report each year by the Friday before the Thanksgiving holiday. Because the major commands rely on the submissions from subordinate activities to complete the command's report, a complete final draft, without a signed Part F, Certification of Establishment of Continuing EEO Programs, is acceptable in order for DON to meet its assigned due date. Signed, final reports must be submitted on or before the 2nd Friday of February following the end of the fiscal year that is being reported to the Office of EEO and Diversity Management. All major commands are responsible for establishing and communicating due dates and command-specific requirements (if applicable) for their EEO Program and annual report to their subordinate activities.

2. Annual Report Required Components: Annual Reports must be completed in accordance with the instructions outlined in Attachment 3 of this section.

a. All major commands will submit an Annual EEO Program Status Report that is reflective of the command's total EEO Program to include subordinate activities with less than 500 employees.

(1) All major commands must develop a plan to implement and conduct an assessment of the command's EEO Program that accounts for all subordinate activities, regardless of size.

(2) A copy of this plan will be provided to the Office of EEO and Diversity Management and to all subordinate activities.

b. Major commands that employ more than 50 employees, but less than 500, are required to submit PARTs A through K as instructed in Attachments 1, 2, and 3.

IV. MAINTENANCE OF SELF-ASSESSMENT RECORDS: Self-assessment records covered by this section are to be maintained by the responsible command and/or activity. This includes not only the signed report, but supporting documentation used to determine objectives and action items. Command records will include a signed copy of all subordinate activity reports. These records must be maintained for possible review and/or request by the Office of EEO and Diversity Management for the current reporting year and four (4) previous fiscal years, at a minimum.

**Instructions for Completing
Department of the Navy
Report of Accomplishments for Special Program Plan
For the Recruitment, Advancement and Placement of
Individuals with Targeted Disabilities**

PART J

BACKGROUND

Section 501 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. 791, requires federal agencies to take proactive steps to provide equal opportunity to qualified individuals with disabilities in all aspects of federal employment. Congress has directed the federal government to serve as a model employer of people with disabilities. Toward that end, each agency must develop and maintain an affirmative action program plan for the hiring, placement, and advancement of individuals with disabilities that, among other things, provides adequate employment opportunities and describes how the agency will meet the needs of its employees with disabilities. EEO Management Directive 715 provides specific requirements for the agency's Special Program Plan for the Recruitment, Placement and Advancement of Individuals with Targeted Disabilities.

DON POLICY

It is the goal of the Department of the Navy (DON) to achieve a workforce representation of 2% individuals with targeted disabilities (IWTD) by 2010 and to maintain this level, at a minimum, in the out years.

DON REPORTING REQUIREMENTS

In support of this goal and to demonstrate their commitment, commands with 50 or more employees and activities with 500 or more employees must develop and maintain an on-going Special Program and Plan for the Recruitment, Placement and Advancement of IWTD. Each command is responsible for annually reporting the status of their program plan, to include subordinate activities with 499 or less employees, to the DON Office of EEO and Diversity Management on the DON PART J form.

PART J

EXECUTIVE SUMMARY

The Executive Summary is intended to provide a brief but informative summary of the command/activity's overall program, program deficiencies, identified barriers to equal opportunity, their plan to correct deficiencies/eliminate barriers, and to report program/plan accomplishments for the current reporting period. The Executive Summary must include the following information:

- 1) A brief description of the command/activity's strategies and activities undertaken, to include current status, to maintain a Special Program for the Recruitment, Placement and Advancement of IWTD.
- 2) A summary of the results of the workforce analyses conducted by the command/activity.
- 3) A brief description of the current state of the strengths and weaknesses of the

- command's/activity's Special Program when evaluated against the program elements identified in DON PART J-1.
- 4) A brief description of the command's/activity's planned activities to address identified program deficiencies during the next reporting period and accomplishments for the current reporting period.
 - 5) A brief description of the command's/activity's planned activities to address identified barriers to equal opportunity during the next reporting period and accomplishments for the current reporting period.
 - 6) A brief description of any other noteworthy activities and/or accomplishments.

PROGRAM CERTIFICATION

The certification that a Special Program has been established and is being maintained must be signed by the command's Equal Employment Opportunity Officer (EEOO) and the command's Deputy EEO Officer (CDEEOO). The EEOO may delegate the authority to sign this certification in rare circumstances. Any delegation of this responsibility must be documented in writing, to include a brief explanation for the delegation, and provided to the Office of EEO and Diversity Management for approval and recordkeeping purposes.

<p style="text-align: center;"><u>PART J-1</u></p> <p style="text-align: center;">CHECKLIST FOR THE ANNUAL ASSESSMENT OF IWTD PROGRAM</p>	<p>All command/activities with 50 or more employees must annually assess their efforts to establish and maintain an IWTD Program that is in compliance with the requirements set forth by the DON Office of EEO and Diversity Management. Each question in PART J-1 must be marked with either a 'yes' or 'no' response. Any question that is marked with a 'no' response will require the development of an EEO Plan to Attain the Essential Elements of an IWTD Program (PART J-2). The development of a single EEO Plan for deficiencies that are common in nature is acceptable as long as planned activities to eliminate each deficiency are addressed in the submitted Plan.</p>
<p style="text-align: center;"><u>PART J-2</u></p> <p style="text-align: center;">EEO PLAN TO ATTAIN THE ESSENTIAL ELEMENTS OF AN IWTD PROGRAM</p>	<p>This PART will be completed in accordance with the instructions provided below:</p> <ol style="list-style-type: none"> (1) Provide a clear, succinct statement of the program deficiency(ies) that will be addressed in this PART. (2) A Responsible Official(s) must be identified by name and position title. (3) The Target Date for completion of each objective and planned activities must be specific, i.e., target dates identified as 'on-going' is not acceptable. (4) Short, descriptive Planned Activities that relate back to the identified program deficiency and objective must be provided. (5) Two separate PART J-2 forms are to be submitted, one for the current reporting period and one for the upcoming one

	<p>as follows: (a) PART J-2 forms for the current reporting period will be identified by the appropriate FY, i.e., the current reporting period, and will include a report of accomplishments and results toward the completion of planned activities described in the command's/activity's report for the previous reporting period. (b) PART J-2 forms for the next reporting period will be identified by the appropriate FY, i.e., the next reporting period, and will outline planned activities for the upcoming fiscal year.</p>
<p><u>PART J-3</u></p> <p>WORKFORCE ANALYSIS FOR IWTD</p>	<p>A thorough analysis of the IWTD workforce population must be accomplished in order to effectively initiate and conduct the barrier identification and elimination process. This analysis will assist the command/activity in the identification of any triggers for potential barriers. If a trigger is identified the command/activity must conduct a further investigation to determine the potential cause(s) for these triggers in order to accurately identify and eliminate specific barrier(s). This PART will be completed in accordance with the instructions provided below and in the PART J-3 form.</p> <p>Section 1. EEOC Workforce Data Table B-1 will be used for this comparison. Compare the IWTD overall workforce numbers for the current reporting period with the previous period. Some questions to be considered include, but are not limited to:</p> <ol style="list-style-type: none"> (1) Did the IWTD overall workforce number increase or decrease from the previous year? (2) What was the number of IWTD new hires for the reporting period (Table B-8)? (3) What was the number of IWTD separations for the reporting period (Table B-14)? (4) Was there an organizational action that occurred during the reporting period that could account for any differences, e.g., reduction-in-force, BRAC? <p>Section 2. EEOC Workforce Data Table B-3 will be used for this analysis. Compare the IWTD workforce and their representation in the different occupational groups. Some questions to be considered include, but are not limited to:</p> <ol style="list-style-type: none"> (1) Which occupational group(s) does the majority of the command's/activity's workforce fall into? (2) What is the participation rate of IWTD in the different occupational groups in comparison to their representation in the overall workforce? (3) Is the IWTD workforce represented proportionately in the different occupational groups when compared to the rest of the workforce?

Section 3. EEOC Workforce Data Tables B-4 and B-5 will be used for this analysis. Compare the IWTD workforce and their representation in the different grade levels/pay bands. Some questions to be considered include, but are not limited to:

- (1) What is the participation rate of IWTD in the different grade groups in comparison to their representation in the overall workforce?
- (2) Is the IWTD workforce represented proportionately in the different grade groups when compared to the rest of the workforce?
- (3) What grade groups do the majority of the IWTD workforce fall into?

Section 4. EEOC Workforce Data Table B-6 will be used for this analysis. Compare the IWTD workforce and their representation in the command's/activity's major occupations. Some questions to be considered include, but are not limited to:

- (1) What is the participation rate of IWTD in the command's/activity's major occupations?
- (2) Which major occupation(s) do the majority of the IWTD workforce fall into?
- (3) Were any of the IWTD new hires in the command's/activity's major occupations?

Section 5. EEOC Workforce Data Table B-7 will be used for this analysis. Some questions to be considered include, but are not limited to:

- (1) Is the applicant pool for major occupations sufficiently diverse and includes IWTD?
- (2) Does the command/activity routinely use the Schedule A appointing authority as a source to fill vacant positions?

Section 6. EEOC Workforce Data Table B-8 will be used for this analysis. Some questions to be considered include, but are not limited to:

- (1) How many IWTD were hired in the reporting period?
- (2) Which series/occupational groups were IWTD hired into?
- (3) How many IWTD were hired through use of the Schedule A appointing authority?
- (4) How do the number of IWTD accessions compare with their separation rate (Table B-14)?

Section 7. EEOC Workforce Data Table B-9 will be used for this analysis. Some questions to be considered include, but are not limited to:

- (1) How many IWTD were selected in major occupation positions under merit promotion procedures?
- (2) Was there a sufficient number of IWTD applying for these positions?
- (3) Are there a sufficient number of IWTD on the certificate of

	<p>eligible candidates?</p> <p>Section 8. EEOC Workforce Data Table B-12 will be used for this analysis. Some questions to be considered include, but are not limited to:</p> <ol style="list-style-type: none"> (1) What are the different career development programs and IWTD application rates for these programs? (2) What is the selection rate for IWTD? <p>Section 9. EEOC Workforce Data Table B-13 will be used for this analysis. Some questions to be considered include, but are not limited to:</p> <ol style="list-style-type: none"> (1) How did the receipt of awards for IWTD compare to their representation in the workforce? (2) How did the amount and type of awards for IWTD compare to employees with no disabilities? <p>Section 10. EEOC Workforce Data Table B-14 will be used for this analysis. Some questions to be considered include, but are not limited to:</p> <ol style="list-style-type: none"> (1) Is the separation rate for IWTD higher than the ratio for employees with no disabilities? (2) Is the separation rate for IWTD higher than their accession rate? (3) Is there a difference between the rate of involuntary separations when compared to voluntary for IWTD? <p>Section 11. Some other questions to be considered include, but are not limited to:</p> <ol style="list-style-type: none"> (1) Where and how does the command/activity conduct their recruitment efforts for positions other than their major occupations? (2) Have these efforts resulted in a sufficiently diverse applicant pool to include IWTD? (3) Are special accommodations considered beforehand, e.g., large print publications, accessible areas. <p>NOTE: The above sections are not the only areas where IWTD may be denied equal access to employment opportunities. Other areas that should be reviewed include, but are not limited to: a comparison of IWTD workforce representation within a command (Table B-2), time-in-grade/pay schedule for non-competitive promotions (Table B-10), internal selections for senior level positions (Table B-11), performance ratings, reduction-in-force actions, discrimination complaint trends, etc.</p>
<p><u>PART J-4</u></p>	<p>All command/activities with 500 or more employees must establish and maintain an on-going Special Program for the Recruitment, Placement and Advancement of IWTD. These on-going efforts are essential to the achievement of the DON goal of a 2% representation of IWTD in our workforce. More importantly,</p>

<p style="text-align: center;">STRATEGIES AND ACTIVITIES TO MAINTAIN PROGRAM FOR IWTD</p>	<p>these on-going efforts will allow us to sustain and achieve IWTD representation at or above our 2% goal. This PART will be completed in accordance with the instructions provided below and in the PART J-4 form.</p> <p>Section 1. The command/activity must establish and maintain an on-going Special Recruitment Program and Plan for IWTD. Components of this program and plan must include, but is not limited to:</p> <ol style="list-style-type: none"> (1) How and where recruitment is executed; (2) The expected results of recruitment efforts; (3) Training to stakeholders, e.g., recruiters, selecting officials, HR practitioners; (4) Establishment of appropriate tracking/monitoring systems; (5) Establishment of a collaborative partnership with individuals responsible for the recruitment program and those individuals responsible for the IWTD Program; and (6) Accomplishments and results. <p>Section 2. The command/activity must establish and maintain an on-going Special Employment Program and Plan for IWTD. Components of this program and plan must include, but is not limited to:</p> <ol style="list-style-type: none"> (1) The use of special hiring authorities, e.g., Schedule A; (2) A description of the command's/activity's plan to achieve the DON goal of an IWTD workforce representation of at least 2%; (3) The command's/activity's strategy to communicate the program and plan to stakeholders, e.g., recruiters, selecting officials; (4) Retention strategy; and (5) Accomplishments and results. <p>Section 3. The command/activity must establish and maintain an on-going Special Advancement Program and Plan for IWTD. Components of this program and plan must include, but is not limited to:</p> <ol style="list-style-type: none"> (1) Strategies for the placement of IWTD in such a way to improve possibilities for career development; (2) Strategies to improve possibilities for promotion opportunities; (3) Command's/activity's strategy to communicate the program and plan to stakeholders, e.g., supervisors/managers, HR practitioners, IWTD workforce; and (4) Accomplishments and results.
<p style="text-align: center;"><u>PART J-5</u></p>	<p>If a trigger(s) for a potential barrier(s) is identified after an analysis of the MD-715 Workforce Data Tables B, PART J-3, PART J-4, review of command/activity employment policies,</p>

**EEO PLAN TO
ELIMINATE
IDENTIFIED
BARRIERS FOR
IWTD**

practices and/or procedures and any other relevant data/information, an investigation to pinpoint actual barriers and root causes must be initiated. If a barrier(s) to equal opportunity for IWTD is identified, the command/activity must report their barrier analysis efforts, plans to eliminate identified barriers and accomplishments toward completion of objectives in this PART. This PART will be completed in accordance with the instructions provided below and in the PART J-5 form.

- (1) Provide a clear, succinct statement of the trigger(s) for a potential barrier. Hint: a trigger may be identified as a result of the analysis conducted in PART J-3, a review of command/activity employment policies, practices or procedures, discrimination complaint data trends.
- (2) Describe the results of the in-depth investigation that was conducted to determine the root cause of an identified barrier. For example if a low participation rate of IWTD in the overall workforce was identified as a trigger for a potential barrier, a more in-depth investigation may involve a review of applicant flow data, review of hiring authorities used, recruitment efforts, selection process, separation rates, etc.
- (3) Describe the specific command/activity policy, practice or procedure that was identified as the barrier to equal opportunity. Only after the in-depth investigation has been accomplished as described in (2) above will it be possible to pinpoint the actual barrier to equal opportunity for IWTD. Hint: Using the example in (2) above, the low participation rate of IWTD in the overall workforce is NOT the barrier.
- (4) Describe the expected change, alternative or revision to the command's/activity's policy, practice or procedure identified as a barrier to equal opportunity. Hint: Using the example in (2) above, if the barrier identified is an applicant pool that is not sufficiently diverse to include IWTD, a potential objective could be a change/modification to the current recruitment plan.
- (5) A Responsible Official(s) must be identified by name and position title.
- (6) The Target Date for completion of each objective and planned activities must be specific, i.e., target dates identified as 'on-going' is not acceptable.
- (7) Short, descriptive Planned Activities that relate back to the identified barrier to equal opportunity and objective must be provided.
- (8) Two separate PART J-5 forms are to be submitted, one for the current reporting period and one for the upcoming one

	<p>as follows:</p> <ul style="list-style-type: none">(a) PART J-5 forms for the current reporting period will be identified by the appropriate FY, i.e., the current reporting period, and will include a report of accomplishments and results toward the completion of planned activities described in the command's/activity's report for the previous reporting period.(b) PART J-5 forms for the next reporting period will be identified by the appropriate FY, i.e., the next reporting period, and will outline planned activities for the upcoming fiscal year.
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DEPARTMENT OF THE NAVY
REPORT OF ACCOMPLISHMENTS ON SPECIAL PROGRAM PLAN FOR THE
RECRUITMENT, PLACEMENT AND ADVANCEMENT OF INDIVIDUALS WITH
TARGETED DISABILITIES

PART J

COMMAND/ACTIVITY:

FY-

EXECUTIVE SUMMARY

DEPARTMENT OF THE NAVY	
SPECIAL PROGRAM PLAN FOR THE RECRUITMENT, PLACEMENT AND ADVANCEMENT OF INDIVIDUALS WITH TARGETED DISABILITIES	
CERTIFICATION of ESTABLISHMENT and MAINTENANCE of a CONTINUING SPECIAL PROGRAM and PLAN FOR THE RECRUITMENT, PLACEMENT AND ADVANCEMENT OF INDIVIDUALS WITH TARGETED DISABILITIES	
I, insert name and official title , am the Command Deputy EEO Officer/Deputy EEO Officer for insert organizational title, geographic location .	
The insert organizational title has a Special Program and Plan for the Recruitment, Placement and Advancement of Individuals with Targeted Disabilities, to include identified strategies and activities, in place.	
The insert organizational title has conducted an annual self-assessment of its Section 501 programs against the essential elements of a model Special Program as outlined in DON PART J-1 and EEO Management Directive (MD) 715. If our program and/or plan was not fully compliant with an essential element(s), a DON PART J-2 EEO Plan(s) for Attaining the Essential Elements of a model Special program, is included in the command's/activity's Annual EEO Program Status Report.	
The insert organizational title has analyzed its workforce profiles for individuals with targeted disabilities, DON PART J-3, and barrier analyses efforts aimed at detecting whether any management or personnel policy, practice or procedure is operating to disadvantage individuals with targeted disabilities are on-going. DON PART J-5 EEO Plan/s to Eliminate Identified Barriers, if needed, is/are included with the command's/activity's Annual EEO Program Status Report.	
I certify that proper documentation of this assessment is in place and is being maintained for DON and/or EEOC review upon request.	
<u>Signature of Command Deputy EEO Officer/Deputy EEO Officer</u> Certifies that this Annual EEO Program Status Report is in compliance with DON guidance/EEO MD-715.	<u>DATE</u>
<u>Signature of Command/Activity EEO Officer</u>	<u>DATE</u>

DEPARTMENT OF THE NAVY			
ANNUAL ASSESSMENT OF THE COMMAND'S/ACTIVITY'S INDIVIDUALS WITH TARGETED DISABILITIES PROGRAM (IWTD)			
PART J-1			
COMMAND/ACTIVITY:		FY-	
1. Demonstrated Commitment from Command/Activity Leadership		Measurement Met	
		Yes	No
Each question marked with a no response requires completion of a Form PART J-2.			
a.	Have you communicated your commitment to create/further employment opportunities for IWTD within your command and subordinate activities?		
b.	Are new supervisors briefed on your command's/activity's IWTD Program and Plan upon promotion into the supervisory ranks?		
c.	Is information on the command/activity IWTD Program and Plan communicated and made available to all employees?		
d.	Are managers and supervisors evaluated on their commitment to your command's/activity's IWTD policies, program and plan to include:		
	The recruitment, placement and advancement of individuals with targeted disabilities?		
	Ensuring that the Reasonable Accommodation POC is involved in all requests for disability accommodation?		
	Reasonable accommodation requests are processed in accordance with applicable law, rule and DON instructions.		
2. Integration of EEO into the Command's/Activity's Strategic Mission			
a.	Are the duties and responsibilities of your IWTD Program Manager (at the command and activity levels) clearly defined?		
b.	Does the IWTD Program Manager have the knowledge, skills, and abilities to carry out the duties and responsibilities of your program?		
c.	Are you and other senior management officials regularly briefed on the status of your organization's IWTD Program and Plan?		
d.	Do you and/or senior management officials consider the possible impact on your IWTD workforce prior to the implementation of a newly established employment process, procedure or policy?		
e.	Are management/personnel policies, procedures and practices, e.g., recruitment, hiring, promotion, training, discipline, retention, examined on a regular schedule to assess if there are any barriers to equality of opportunity for IWTD?		
f.	Are sufficient personnel resources allocated to the IWTD program to ensure that your command and subordinate activities annually conduct the self-assessments and self-analyses required by EEO MD-715 and the DON?		

g.	Are accessibility studies of your command/activity facilities conducted on a regular cycle?		
	Are identified accessibility issues brought to the attention of the facility's point of contact to ensure the timely implementation of corrective action?		
	Are major building accessibility issues brought to the attention of the appropriate point of contact to ensure the timely implementation of corrective action?		
h.	Does your command/activity have a sufficient budget to ensure that approved reasonable accommodation requests are fully implemented?		
3. Management and Program Accountability			
a.	Are you and your subordinate management/supervisory officials provided regular (monthly/quarterly/semi-annually) EEO updates by EEO program officials to include the status of your command's/activity's IWTD program, plan, issues and initiatives?		
b.	Are appropriate managers at your command/subordinate activities included as collaborative partners in the on-going development and implementation of PARTs J-2 and J-5 EEO Plans?		
c.	Are the reviews of your command/activity recruitment, hiring and placement, promotion, award, training, discipline programs performed at regular intervals to determine if there are any systemic barriers that may impede the full participation of IWTD?		
d.	Have all your employees, supervisors and managers been informed of the penalties for findings of discrimination resulting from discriminatory behavior or personnel actions (to include decisions regarding reasonable accommodation requests) based upon an individual's disability status?		
e.	Has your command/activity, when appropriate, disciplined managers/supervisors or employees found to have discriminated on the basis of disability over the past two years?		
	If yes, cite the number of discriminatory findings and describe the corrective/disciplinary action for each violation.		
f.	Does your command/activity promptly (within the established time frame) comply with third party decision/orders on disability based claims?		
g.	After a review of your command's/activity's disability accommodation decisions/actions to ensure compliance with written procedures and an analysis of information tracked for trends, problems, etc., is corrective action, if appropriate, promptly initiated and implemented?		
4. Proactive Prevention			
a.	Do senior managers meet with and assist the EEO Officer and/or other EEO Program officials in the identification of barriers that may be impeding the realization of equality of opportunity for IWTD?		
b.	When barriers are identified for IWTD, do senior managers develop and implement, with the assistance of the servicing EEO office, PART J-5 EEO Plans to eliminate identified barriers?		

c.	Do senior managers successful implement PARTs J-2 and J-5 EEO Plans and incorporate Plan Objectives into command/activity strategic plans?		
d.	Are the results of trend analysis of workforce profiles, by disability, tracked, monitored and a more in-depth analysis accomplished when triggers for potential barriers are identified?		
e.	Are the results of trend analyses of the workforce's major occupations, by disability, tracked, monitored and a more in depth analysis accomplished when triggers for potential barriers are identified?		
f.	Are the results of trend analyses of the workforce's grade level distribution, by disability, tracked, monitored and a more in depth analysis accomplished when triggers for potential barriers are identified?		
g.	Are the results of trend analyses of the workforce's compensation and award distribution, by disability, tracked, monitored and a more in depth analysis accomplished when triggers for potential barriers are identified?		
h.	Are all employees encouraged to use ADR during the reasonable accommodation process, as needed?		
5. Efficiency			
a.	Does your servicing EEO Office employ personnel with adequate training and experience to conduct the disability analyses required by MD-715 and DON instructions?		
b.	Has your command/activity implemented an adequate data collection and analysis systems that permit tracking of the disability information required by MD-715 and DON instructions?		
c.	Has the designated Reasonable Accommodation point of contact been provided adequate training and has the experience to assist in processing reasonable accommodation requests in accordance with DON instructions?		
d.	Does your command/activity have an adequate process/system for tracking/monitoring the timely processing of reasonable accommodation requests?		
e.	Does your command/activity conduct an appropriate analysis of disability complaints and implement recommendations for corrective action, if needed?		
f.	Are complaints of discrimination raising the basis of disability processed within the guidelines and timeframes identified in the DON Discrimination Complaints Manual?		
6. Responsiveness and Legal Compliance			
a.	Does your command/activity submit timely and complete responses to the DON with respect to reporting requirements, data calls, request for information, etc., regarding the IWTD Program and Plan?		
b.	Is your command's/activity's IWTD Program and Plan established and maintained in accordance with law, EEOC and DON guidance/instructions?		

DEPARTMENT OF THE NAVY EEO PLAN TO ATTAIN THE ESSENTIAL ELEMENTS OF AN INDIVIDUALS WITH TARGETED DISABILITIES PROGRAM PART J-2	
COMMAND/ACTIVITY:	FY -
STATEMENT OF IWTD PROGRAM DEFICIENCY:	
OBJECTIVE:	
RESPONSIBLE OFFICIAL(S):	
DATE OBJECTIVE INITIATED:	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (MUST BE SPECIFIC)
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:	

DEPARTMENT OF THE NAVY
WORKFORCE ANALYSIS OF INDIVIDUALS WITH TARGETED DISABILITIES
PART J-3

COMMAND/ACTIVITY:

FY-

Section 1: Provide a brief narrative summary of the analysis of the command's/activity's IWTD overall workforce as compared to the previous year, e.g., did the IWTD overall workforce numbers increase or decrease from the previous year.

Section 2: Provide a brief narrative summary of the analysis of the command's/activity's IWTD workforce by occupational groups, e.g., what is the participation rate of IWTD in the different occupational groups in comparison to their representation in the overall workforce.

Section 3: Provide a brief narrative summary of the analysis of the command's/activity's IWTD workforce by grade levels, i.e., NSPS, GS, WG, Demo, e.g., what is the participation rate of IWTD in the different grade groups in comparison to their representation in the overall workforce.

Section 4: Provide a brief narrative summary of the analysis of the command's/activity's IWTD workforce by major occupations, e.g., what is the participation rate of IWTD in the major occupations.

Section 5: Provide a brief narrative summary of the analysis of the command's/activity's applicant flow data for major occupations specific to IWTD, e.g., is the applicant pool sufficiently diverse to include IWTD.

Section 6: Provide a brief narrative summary of the analysis of the command/activity's IWTD accessions, e.g., number of accessions, number of accessions by series/occupational groups, compare accession rate to separation rate, use of Schedule A appointments.

Section 7: Provide a brief narrative summary of the analysis of the command's/activity's IWTD selection rate for merit promotions for major occupations e.g., number of IWTD selections, is there a sufficient number of IWTD applying for these positions.

Section 8: Provide a brief narrative summary of the analysis of the participation rate of IWTD for the command's/activity's career development/training programs, e.g., identify different career development programs, IWTD application/participation rates.

Section 9: Provide a brief narrative summary of the analysis of the participation rate of IWTD with respect to employee recognition and awards, e.g., how do IWTD fare in the receipt of awards when compared to their representation in the workforce.

Section 10: Provide a brief narrative summary of the analysis of the separation rate of IWTD, e.g., is the separation rate for IWTD higher than the ratio for employees with no disabilities, is the IWTD separation rate higher than their accessions.

Section 11: Provide a brief narrative summary of the analysis of the command's/activity's recruitment efforts, e.g., have these efforts resulted in a sufficiently diverse applicant pool to include IWTD.

Other Reviews: Identify and provide a brief narrative summary of other employment processes that were reviewed and analyzed.

DEPARTMENT OF THE NAVY STRATEGIES AND ACTIVITIES UNDERTAKEN TO MAINTAIN A SPECIAL PROGRAM FOR THE RECRUITMENT, EMPLOYMENT AND ADVANCEMENT OF INDIVIDUALS WITH TARGETED DISABILITIES PART J-4	
COMMAND/ACTIVITY:	FY-
<p>Section 1: Describe the command's/activity's special recruitment program and plan for IWTD, e.g. how and where recruitment executed, what are the expected results of these efforts, are recruiters provided a copy of the plan, describe progress of program/plan compared to the previous reporting period(s).</p>	
<p>Section 2: Describe the command's/activity's special employment program and plan for IWTD, e.g. what special hiring authorities will be used, what are the expected results of employment efforts, description of the command's/activity's plan to achieve the DON goal of an IWTD workforce representation of at least 2%, how is the plan communicated to selecting officials, describe progress of program/plan compared to the previous reporting period(s).</p>	
<p>Section 3: Describe the command's/activity's special advancement program and plan for IWTD, e.g. how will IWTD be placed in such a way to improve possibilities for career development, what is the plan for the promotion of IWTD, how is the plan communicated to supervisors/managers, describe progress of program/plan compared to the previous reporting period(s).</p>	

DEPARTMENT OF THE NAVY
EEO PLAN TO ELIMINATE IDENTIFIED BARRIER FOR INDIVIDUALS
WITH TARGETED DISABILITIES
PART J-5

COMMAND/ACTIVITY:	FY-
<p>If a trigger(s) for a potential barrier(s) is identified after an analysis of the data in MD-715 Workforce Data Tables B, PART J-3, PART J-4, command/activity employment policies, practices and procedures and/or any other relevant data/information, an investigation to pinpoint actual barriers and root causes must be undertaken. If a barrier(s) to equality of opportunity for IWTD is identified, the command/activity must report their barrier analysis efforts, plans to eliminate identified barriers and accomplishments toward completion of objectives in this PART.</p>	
<p>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?</p>	
<p>BARRIER ANALYSIS: Provide a description of the steps taken and data analyzed to determine the cause of the condition.</p>	
<p>STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the command/activity policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	
<p>OBJECTIVE: State the alternative or revised command/activity policy, procedure or practice to be implemented to correct the undesired condition.</p>	
<p>RESPONSIBLE OFFICIAL(S):</p>	
<p>DATE OBJECTIVE INITIATED:</p>	

TARGET DATE FOR COMPLETION OF OBJECTIVE:	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:	

PART K
DEPARTMENT OF NAVY
HISPANIC EMPLOYMENT PROGRAM
ANNUAL STATUS REPORT

PART I Command Information	1. Command	1.
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Part II Command Workforce Profile

	Total	WM	WF	BM	BF	HM	HF	AM	AF	NM	NF
Command #											
Command %	100%										
National CLF											

Part III Command Major Occupations (top 5)

Series	Total	WM	WF	BM	BF	HM	HF	AM	AF	NM	NF
Command #											
Command %	100%										
National Series CLF											

Series	Total	WM	WF	BM	BF	HM	HF	AM	AF	NM	NF
Command #											
Command %	100%										
National Series CLF											

Series	Total	WM	WF	BM	BF	HM	HF	AM	AF	NM	NF
Command #											
Command %	100%										
National Series CLF											

Series	Total	WM	WF	BM	BF	HM	HF	AM	AF	NM	NF
Command #											
Command %	100%										
National Series CLF											

Series	Total	WM	WF	BM	BF	HM	HF	AM	AF	NM	NF
Command #											
Command %	100%										
National Series CLF											

Part IV Command High-Grade Profile

	Total	WM	WF	BM	BF	HM	HF	AM	AF	NM	NF
GS-13											
%											
GS-14											
%											
GS-15											
%											
SES											
%											

Part V	Department of Navy Civilian Hispanic Employment Program SECNAVINST 12720.8 (28 Aug 2002)		
Part V-A	Echelon 1 and 2 Command Responsibilities		
	Yes	No	For all unmet measures provide a brief explanation in the space below, or complete and attach a DON HEP PLAN FORM K-1.
Develop and implement plans and programs in support of the policy established in this instruction.			
Establish and issue command objectives that address the elimination of low participation rate of Hispanics in the command.			
Consider the appointment of Hispanic Federal executives to rating, selection, performance review, and executive resources panels and boards.			
Ensure that performance plans for senior executives, managers, and supervisors include language related to significant accomplishments in diversity requirement and career development.			
Ensure that sufficient program resources are available to staff and implement a viable program that addresses activity and command objectives to eliminate low participation of Hispanic people.			
Identify and eliminate at subordinate commands and activities any systemic barriers to the effective recruitment and consideration of Hispanics.			
Evaluate command and activity support of the policy established by this instruction, including but not limited to efforts by subordinate activities to:			

	<ul style="list-style-type: none"> Establish a diverse pool of applicants through the use of innovative recruitment techniques such as student employment programs; 			
	<ul style="list-style-type: none"> Ensure that selection factors are appropriate and achieve the broadest consideration of applicants and do not impose barriers to selections based on non-merit factors. 			
Part V-B	Command Deputy EEO Officer Responsibilities			
	Yes	No	For all 'yes' answers, provide a brief narrative in the space below describing efforts or attach an additional sheet if necessary. For all 'no' answers, provide a brief explanation in the space below, or complete and attach a DON HEP PLAN FORM K-2.	
Provide direct support to their respective commands and activities.				
Oversee development, implementation, management, and evaluation of field activities' Hispanic Employment Programs.				
Advise the echelon 1 and 2 commands on the success of their activities in meeting command objectives.				
Work with commands and activities to:				
<ul style="list-style-type: none"> Improve outreach efforts to include organizations outside the federal government in order to increase the pool of candidates; 				

	<ul style="list-style-type: none"> Promote participation of Hispanic employees in management, leadership, and career development programs; 			
	<ul style="list-style-type: none"> Ensure that managers and supervisors receive periodic training in diversity management in order to carry out their responsibilities to seek and maintain a diverse work force. 			

Part V-C
The
Command
Objective
portion of
Part V-C can
be duplicated as
needed

**COMMAND HISPANIC EMPLOYMENT PROGRAM
FY 2005 ACCOMPLISHMENT REPORT**

Command Objective # _____

**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?

**BARRIER
ANALYSIS:**

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

**STATEMENT OF
IDENTIFIED
BARRIER:** Provide a
succinct statement of
the command policy,
procedure or practice
that has been
determined to be the
barrier of the
undesired condition.

OBJECTIVE:	
State the alternative or revised command policy, procedure or practice to be implemented to correct the undesired condition.	
RESPONSIBLE OFFICIAL:	
DATE OBJECTIVE INITIATED:	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE	Completion Date

REPORT OF MODIFICATIONS TO OBJECTIVES NOT COMPLETED AT END OF FY 2005

<p>Part V-D</p>	<p style="text-align: center;">Command Hispanic Employment Program</p> <p style="text-align: center;">FY2005 Report of Command Significant Accomplishments</p> <p>Report significant accomplishments, best practices and areas of improvement in Hispanic employment in FY 2005.</p> <ul style="list-style-type: none"> • • • • •
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<p>Part V-E</p>	<p style="text-align: center;">Command Hispanic Employment Program</p> <p style="text-align: center;">Plan for FY 2006</p> <ul style="list-style-type: none"> • Plan Objectives - Update for FY 2006, if appropriate • Command Recruitment Initiatives • Command Outreach Initiatives • Command HEP Activity Oversight
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DON HEP FORM K-1

DEPARTMENT OF NAVY HISPANIC EMPLOYMENT PROGRAM
Command Plan to Attain/Address Program Deficiencies

FY _____ [Insert Name of Command]	
STATEMENT of HISPANIC EMPLOYMENT PROGRAM DEFICIENCY:	
OBJECTIVE:	
RESPONSIBLE OFFICIAL:	
DATE OBJECTIVE INITIATED:	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE	

DON HEP FORM K-2

DEPARTMENT OF NAVY HISPANIC EMPLOYMENT PROGRAM
Command Deputy EEO Officer Plan to Accomplish Program Requirements

FY _____ [Insert Name of Command]	
STATEMENT OF HEP DEFICIENT CDEEO RESPONSIBILITY:	
OBJECTIVE:	
RESPONSIBLE CDEEO:	
DATE OBJECTIVE INITIATED:	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE (FY 2006)	

**DON-SPECIFIC INSTRUCTIONS FOR COMPLETING
ANNUAL EEO PROGRAM STATUS REPORT**

PART A	Department or Agency Identifying Information
	No DON-specific instructions; EEOC instructions should be followed.
PART B	Total Employment
	No DON-specific instructions; EEOC instructions should be followed.
PART C	Agency Official(s) Responsible for Oversight of EEO Programs
	No DON-specific instructions; EEOC instructions should be followed.
PART D	List of Subordinate Activities Covered in This Report
	EEOC instructions should be followed. Also include in this part: <ul style="list-style-type: none"> (1) Full organization title for all subordinate activities. (2) Geographical location. (3) Unit Identification Code. (4) Total number of employees.
PART E	Executive Summary
	EEOC instructions should be followed with these DON-specific additions: <ul style="list-style-type: none"> (1) A brief description of the command's mission and mission related functions. (2) A brief description of any changes to the command's organizational structure, e.g., realignments, consolidations, etc. (3) A brief description of the strengths and weaknesses of the command's EEO Program when evaluated against the six essential elements of a model EEO program. (4) A summary of the command's analysis of its workforce demographics. The analysis should include, at a minimum, total workforce, occupational groups, grade levels (i.e., GS, NSPS, DEMO, WG), and major occupations compared to the applicable relevant civilian labor force (RCLF) data and the impact of complaints trends (both negative and positive) upon command personnel management programs. (5) A brief discussion of any problems discovered during the self-assessment process (PART G). (6) A brief description of the command's planned activities for the next reporting period as described in its PART H EEO Plan(s) and accomplishments for the current reporting period. (7) A brief description of any barriers to EEO that were identified as a result of ongoing barrier analyses efforts. (8) A brief description of the command's planned activities for the next reporting period as described in their PART I, EEO Plan(s) and their accomplishments for the current reporting period. (9) A brief description of the command's accomplishments for the current reporting period and planned activities for the next reporting period as described in PART J, Special Program for the Recruitment, Hiring, and Advancement of Individuals with Targeted Disabilities. (10) A brief description of the command's accomplishments for the current reporting period and planned activities for the next reporting period as described in PART K, DON Hispanic Employment Program. (11) A brief description of any other noteworthy activities and/or accomplishments.

Attachment 3

PART F	Certification of Establishment of Continuing EEO Programs
	This certification must be signed by the command's Equal Employment Opportunity Officer (EEOO). The authority to sign this certification may be delegated in rare circumstances. Any delegation of this responsibility must be documented in writing, to include a brief explanation for the delegation, and provided to the Office of EEO and Diversity Management for approval recordkeeping purposes. Copies of the command's most recent EEO Policy Statements must also be included in this PART.
PART G	Agency Self-Assessment Checklist Measuring Essential Elements
	Follow EEOC instructions for completion. Additional guidance is provided in Section 1 of the Subchapter. DON-specific instructions are as follows: (1) All commands/activities with 50 employees or more must complete and submit this checklist. Major commands may modify this Checklist as appropriate for smaller component activities. (2) Supporting documentation for all checklist responses must be maintained and made available upon request.
PART H	EEO Plan to Attain the Essential Elements of a Model EEO Program
	Follow EEOC instructions for completion with these additional DON-specific instructions: (1) Commands/activities will not identify planned activities as "on-going" or establish completion dates in out years beyond the next reporting period. Only those planned activities and/or milestones that are expected to be completed within the next reporting period should be reported in the plan. (2) Beginning with the FY-08 Annual EEO Program Status Report, commands/activities must submit two separate PART H forms, one for the current and one for the upcoming reporting period as follows: (a) PART H forms for the current reporting period will be identified by the appropriate fiscal year (the current reporting period) and will include a report of accomplishments toward the completion of planned activities described in the command's previous report; and, (b) PART H forms for the next reporting cycle will be identified by the appropriate fiscal year (the next reporting period) and will outline planned activities for the upcoming fiscal year. (3) Compare PART H submissions for the current reporting period with the previous year's submission and provide a report of progress in addressing identified program deficiencies.

PART I	EEO Plan to Eliminate Identified Barriers
	<p>Follow EEOC instructions for completion with these additional DON-specific requirements:</p> <p>(1) Beginning with the FY-08 Annual EEO Program Status Report, commands/activities will be required to submit two separate PART I forms, one for the current and one for the upcoming reporting periods as follows:</p> <p>(a) PART I's for the current reporting period will be identified by the appropriate fiscal year (the current reporting period) and will include a report of accomplishments toward the completion of planned activities described in the command's previous report; and,</p> <p>(b) PART I's for the next reporting cycle will be identified by the appropriate fiscal year (the next reporting period) and will outline planned activities for the upcoming fiscal year.</p> <p>(2) Compare Part I submissions for the current reporting period with the prior year's submission, document that barrier analyses efforts are on-going and incremental progress in addressing previously identified barriers to equal employment opportunity is being made.</p>
PART J	Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals with Targeted Disabilities
	<p>Do not use the EEOC PART J form. A detailed DON-specific reporting format for this PART has been developed (see Attachment 1 of this Section which includes a copy of the form). All DON commands and activities with 500 or more employees must complete this PART. Compare PART J submissions for the current reporting period with the prior year's submission to verify that the command/activity strategic plan is on track, barrier analyses efforts are on-going and incremental progress in addressing previously identified barriers for individuals with targeted disabilities is being made.</p>
PART K	DON Hispanic Employment Program Annual Status Report
	<p>This is a DON-unique reporting requirement that was established by SECNAVINST 12720.8. A copy of this PART is provided as Attachment 2 of this Section.</p> <p>(1) Annually compare PART K submissions for the current reporting period with the prior year's submission to verify that the command/activity program and plan is on track, barrier analyses efforts are ongoing and incremental progress in addressing previously identified barriers is being made.</p> <p>(2) Executive Order 13171 tasked the Office of Personnel Management (OPM) to prepare an Annual Report on Hispanic Employment for submittal to the President of the United States. Usually in October of each year, every agency is asked to prepare a report that identifies effective and innovative human capital practices used to recruit and retain talented and skilled citizens, including Hispanics, for their workforces. In order to meet this reporting requirement and to eliminate duplicative reporting requirements, all commands must submit a copy of PART K of their annual report by the 2nd Friday in September of every year.</p>

PART L	Workforce Data Tables
	<p>All EEOC A and B Workforce Data Tables must be completed and submitted with the commands' /activities' final signed report. Guidance for completing the EEOC Workforce Data Tables and copies of blank table forms may be found at http://www.eeoc.gov/federal/715instruct/datatables.html and http://www.eeoc.gov/federal/715instruct/tables.html, respectively.</p> <p>NOTE: These tables are simply a snapshot of the reporting organization at the close of the reporting period. They will be used during the upcoming years as a benchmark for measuring progress/change. They are not to be developed at the end of the reporting period for use in starting barrier identification and elimination efforts that should have been occurring throughout that reporting period.</p>

DON EEO PROGRAM ASSESSMENTS

SECTION 2

DON ASSESSMENT OF MAJOR COMMAND EEO PROGRAM

I. PURPOSE: The purpose of this assessment is to ensure that each major command establishes and maintains effective affirmative programs of equal employment opportunity under Section 717 of Title VII and effective affirmative action programs under Section 501 of the Rehabilitation Act. Major commands will be evaluated on their efforts to conduct:

A. A self-assessment of the command's EEO Program against the six essential elements of a model EEO program, to include an evaluation of their progress on their EEO Plans (Part H) for program deficiencies identified in the previous reporting period(s); and,

B. A self-assessment on a quarterly basis to monitor progress on EEO Plans (Part I) to eliminate barriers identified in the previous reporting period(s) and to sustain an ongoing barrier analysis effort to identify any additional barriers that may operate to exclude certain groups.

In addition to ensuring compliance with governing regulations, these ongoing self-assessment efforts are critical to the DON's efforts to establish and maintain an aligned EEO program that complies with the six essential elements; identify and eliminate barriers to equality of opportunity that is common to the agency; and effectively execute its Special Program Plan for the Recruitment, Hiring and Advancement of Individuals with Targeted Disabilities and Hispanic Employment Program.

II ASSESSMENT RESPONSIBILITY: The DON Office of EEO and Diversity Management is responsible for assessing each major command's Annual EEO Program Status report submission and conducting on-site validation visits. This office will determine and publish the scope of review and frequency of these program assessments/visits.

A. Annual EEO Program Status Report (MD-715 Report) Review: Reference (f) requires each agency to report annually on the status of activities undertaken pursuant to its obligation to establish and maintain effective affirmative programs under Section 717 of Title VII and status of activities undertaken pursuant to its affirmative action obligations under Section 501 of the Rehabilitation Act. The DON Office of EEO and Diversity Management is responsible for preparing and submitting the DON Annual EEO Program Status Report to the Department of Defense and the EEOC. Command level submissions are critical to the development and preparation of the DON report. Therefore, a periodic review of command submissions will be accomplished to ensure DON EEO Program efforts are in compliance with the requirements of reference (f) and this Subchapter.

1. Scope: A review of each major command's annual report submission will be accomplished on an annual basis and/or as needed. This review will evaluate a command's

efforts to conduct a self-assessment in accordance with the instructions provided in reference (f) and the DON requirements delineated in Section 1 of this Subchapter.

2. Feedback: Following the review of a major command's Annual EEO Program Status Report, feedback will be provided by memorandum to the Commander. If the feedback contains recommendations for corrective action, a written response, signed by the Commander, outlining the plan to implement these recommendations must be submitted to the Office of EEO and Diversity Management no later than 30 calendar days after receipt of the review letter.

B. On-Site Validation Visits:

1. Scope: The purpose of these on-site visits is to conduct a top level assessment of the overall effectiveness of the command's EEO program and to validate the command's self-assessment efforts. Validation visits will usually be accomplished on a three-year cycle and commands will be provided advance notice of a scheduled visit. The scope of these visits will generally include:

a. Interviews with the EEOO and/or senior level management officials to validate their understanding of and commitment to equality of opportunity for all employees and applicants for employment.

b. A determination of how the principles of EEO have been integrated into the command's strategic mission and an evaluation of supervisors'/managers' efforts to execute their EEO role and responsibilities.

c. A determination of how supervisors/managers, EEO/HR practitioners, and Human Resources officers are held accountable for the effective implementation and management of the command's EEO program.

d. A status update on the command's ongoing self-assessment efforts to identify and eliminate any barriers to equality of access, competition and opportunity in the command's workplace practices, policies or procedures.

e. A review of the command's discrimination complaints management process to determine if it provides for early informal resolution, and is efficient, timely, compliant, fair and impartial.

f. An assessment to determine if the command is in compliance with applicable EEO laws, rules, regulations, orders and instructions. In addition, a review of the command's EEO program reports and accomplishments will be conducted to determine if they are timely, accurate and complete.

g. A review of the guidance and direction provided by the major command to subordinate activities and/or EEO service delivery providers on the effective management and implementation of the EEO Programs at those levels, to include the results of any recent reviews, assessments, and/or inspections accomplished by the major command.

2. Preparation: To assist the major commands in preparing for on-site validation visits, a list of the EEO program components that are subject to review is provided as Attachment 1. A list of documents that may be requested prior to and/or to be made available during the validation visit is provided as Attachment 2.

III. RECORDS MAINTENANCE: Records of the reviews covered by this Section will be maintained by the Office of EEO and Diversity Management for the current and a minimum of four (4) previous fiscal years.

DON EEO PROGRAM ASSESSMENTS

SCOPE OF EEO PROGRAM REVIEW AT THE MAJOR COMMAND LEVEL

I. EEO PROGRAM MANAGEMENT:

A. Validation of effective implementation of the major command's EEO Program as outlined in references (a) and (f).

B. Validation of the major command's EEO program as reported in the Annual EEO Program Status Report:

1. Assessment of command's EEO Program measured against the six essential elements of a model EEO program (to include a review of the documentation that validates the command's responses to the Self-Assessment Checklist responses):

- (a) Demonstrated Commitment of Leadership
- (b) Integration of EEO into Strategic Mission
- (c) Management and Program Accountability
 - (1) Review of the command's plan for ensuring activity level accountability (to include activities with 499 or less employees)
 - (2) Validation of management involvement and personal accountability for executing their EEO role and responsibilities
- (d) Proactive Prevention of Discrimination
- (e) Efficiency
 - (1) Processes, procedures, resources
- (f) Responsiveness and Legal Compliance
 - (1) Status of pending cases.
 - (2) Validation of the command's responsiveness to DON reporting requirements/data calls

2. Assessment of barrier identification and elimination efforts:

- (a) Validation of the command's barrier analysis efforts
- (b) Validation of the command's Special Program Plan for the Recruitment, Hiring and Advancement of Individuals with Targeted Disabilities
- (c) Validation of the command's Hispanic Employment Program and Plan

3. Training Plan for managers, supervisors, and employees

II. SPECIAL EMPHASIS PROGRAMS. In addition to a review of the other required programs, there will be particular emphasis on the People with Disabilities Program to include command procedures for requesting reasonable accommodation as well as the command's tracking and monitoring process.

Attachment 1

III. Collaboration on Human Resources Programs. Validation that a collaborative relationship has been established with HR practitioners to ensure that EEO practitioners are knowledgeable/involved in all relevant employment programs/processes.

IV. Alternative Dispute Resolution (ADR) Program.

A. Validation that trends/statistical analysis are regularly accomplished

B. Validation that the ADR Program is managed and administered in accordance with CHRM Subchapter 773

V. Discrimination Complaints Management Program

A. Validation that trends/statistical analysis are regularly accomplished

B. Validation that the command monitors the quality of complaints processing at subordinate activity levels

C. Validation that the command monitors the timeliness of complaints processing at subordinate activity levels through the use of *iComplaints*

VI. Anti-Harassment Program.

A. Validation that a command policy has been issued and disseminated

B. Validation that the Anti-Harassment Program is managed and administered in accordance with CHRM Subchapter 1612

VII. Community Outreach. Validation that community outreach activities relate back to problem areas identified by the command during their ongoing barrier analysis efforts.

DON EEO PROGRAM ASSESSMENTS

DOCUMENTS/INFORMATION REQUIRED FOR ON-SITE VALIDATION VISITS

NOTE:

- Items annotated with an * must be provided to the Office of EEO and Diversity Management prior to the scheduled on-site visit.
- Additional documents/information may be requested as needed.

I. EEO Program Management

*A. EEO office organizational chart/staffing levels with program responsibility(ies) annotated

*B. Documentation of training provided to EEO staff to develop and sustain technical competence, to include EEO staff at the activity level

*C. Documentation of guidance/training provided to subordinate activities on program execution

*D. Command issued EEO instructions, guidance, policies, issuances, standard operating procedures, etc.

*E. Listing of EEO training provided and/or made available to supervisors/managers and all employees

*F. EEO Policy Statements

G. Documentation of EEO program information dissemination/availability to workforce and/or applicants for employment

*H. Documentation that performance plans for supervisors/managers include an EEO element

*I. Copies of most recent IG inspections (EEO portion only) of subordinate activities

*J. List of EEO program service providers (if EEO program services are not provided by staff employed within the command) to include contact information

Attachment 2

*K. Copies of cross-servicing agreements if EEO program services are not provided by staff employed within the command

L. Tracking/monitoring systems, e.g., training, reasonable accommodation requests, discipline, etc.

II. Annual EEO Program Status Reports/Documentation

A. Subordinate activity Annual EEO Program Status Report submissions, to include any guidance and/or feedback provided by the major command

*B. Documentation of annual State of the Agency briefings to the EEOO

C. Documentation to validate responses for the most recent Self-Assessment Checklist

D. Documentation of progress, to date, on current Part H Plans

E. Documentation of ongoing barrier analysis efforts

F. Documentation of progress, to date, on current Part I Plans

III. Reasonable Accommodation Procedures

A. Implementation of reasonable accommodation processes and procedures

B. Documentation of training provided to managers/supervisors/employees

IV. Alternative Dispute Resolution (ADR) Program

A. Data/trend analysis of ADR events

B. Copies of command instructions/guidance for management, implementation, and administration of the ADR Program

V. Discrimination Complaints Management Program

A. Data/trend analysis of complaints filed command-wide

B. Quality/timeliness/compliance of complaints processing procedures

VI. Anti-Harassment Program

A. Policy statement

B. Command procedures for investigating allegations of harassment (non-sexual/sexual) when an employee elects not to file a discrimination complaint, as required by CHRM Subchapter 1612

VII. Special Emphasis Programs

A. Hispanic Employment Program (as implemented by SECNAVINST 12720.8)

*1. Command Hispanic Employment Program Plan

2. Documentation of progress, to date, on current Part K Plans

B. People with Disabilities Program

*1. Copy of Program Plan

2. Documentation of progress to date on current objectives/action plans

C. Documentation that other Special Emphasis Programs listed below, at subordinate activity levels, are managed and administered in accordance with the direction/guidance provided by the command:

1. Alaskan Native/American Indian Employment Program

2. Asian/Pacific Islander Employment Program

3. Black Employment Program

4. Federal Women's Program

DON EEO PROGRAM ASSESSMENTS

SECTION 3

ASSESSMENT OF SUBORDINATE ACTIVITY EEO PROGRAM BY MAJOR COMMAND

I. PURPOSE: These assessments will ensure DON activities establish and maintain effective affirmative programs of EEO under Section 717 of Title VII and effective affirmative action programs under Section 501 of the Rehabilitation Act. Activities will be evaluated by their major command on their efforts to conduct:

A. A self-assessment of their EEO program against the six essential elements of a model EEO program, to include an evaluation of their progress on their EEO Plans (Part H) for program deficiencies identified in the previous reporting period(s); and,

B. A self-assessment on a quarterly basis to monitor progress on EEO Plans (Part I) to eliminate barriers identified in the previous reporting period(s) and to sustain an ongoing barrier analysis effort to identify any additional barriers that may operate to exclude certain groups.

Ongoing activity level assessments are critical to the major command's efforts to identify barriers that are common to the command, to implement the command's plan of action to eliminate any identified barriers and to effectively execute its Special Program Plan for the Recruitment, Hiring and Advancement of Individuals with Disabilities Program, and Hispanic Employment Program.

II. ASSESSMENT RESPONSIBILITY: The requirements described in this section will be performed by the staff or designees of the CDEEEO.

A. Annual EEO Program Status Report (MD-715 REPORT) Review:

1. Scope: Each subordinate activities annual MD-715 report submission must be reviewed on at least an annual basis by the major command. Refer to Section 1 of this Subchapter for more detailed information on the scope of this review.

2. Feedback: Following the review of a subordinate activity level Annual EEO Program Status Report, the major command will provide written feedback to the activity's EEO. CDEEEO's will determine the requirement for a written response outlining a plan for corrective action from the activity's EEO on the feedback provided.

B. On-Site Assessment:

1. Purpose: Major Commands must establish a schedule for conducting regular, more in-depth internal assessments of the EEO Program at all subordinate activities, regardless of size, to ascertain the effective implementation and management of subordinate programs and to validate the activity's good faith efforts to identify and remove barriers to equality of

opportunity in the workplace. It is strongly recommended that these internal assessments be conducted on-site, when possible. Major commands are responsible for determining the most effective and efficient method for conducting these assessments.

2. Scope: At a minimum, assessment shall include an appropriate records review and interviews with applicable stakeholders.

a. The following individuals and/or groups of individuals should be scheduled for interviews as appropriate:

- (1) EEOO
- (2) Senior level managers/supervisors
- (3) Mid and first level supervisors
- (4) DEEOO or EEO site manager
- (5) EEO/HR practitioners
- (6) Employees
- (7) EEO Program committee members
- (8) Union officials
- (9) Other employee groups
- (10) Community outreach partners

b. A list of EEO program components and documents that must be reviewed by the major command is provided in Attachment 1.

3. Inspector General Inspection (IG): In accordance with references (j) and (l), the IG's Office is authorized to inspect, investigate, assess or inquire into any and all matters of importance to the command to include EEO programs. To avoid duplication of efforts and minimize impact on personnel and fiscal resources, if an IG inspection is scheduled at the same time as the on-site assessment required in this chapter, the CDEEOO must make a determination if the IG inspection will encompass the same review as required by this chapter. The IG inspection may take the place of the on-site assessment if it is determined that the inspection includes the same topics.

III. RECORDS MAINTENANCE: Records of the assessments covered by this section will be maintained by the CDEEOO for the current and four (4) previous fiscal years, at a minimum.

DON EEO PROGRAM ASSESSMENT

SCOPE OF EEO PROGRAM REVIEW AT THE ACTIVITY LEVEL

I. EEO Program Management:

A. Program Resources

1. EEO office organization, staff, and assigned program responsibilities
2. Documentation of training for EEO staff
3. Documentation of access to EEO Officer and participation in discussions, meetings, committees, etc. where employment decisions impacting the workforce are made
4. Accessibility of EEO Office
5. List of EEO program service providers (if EEO program services are not provided by staff employed within the command) to include contact information
6. Copies of cross-servicing agreements (if EEO program services are not provided by staff employed within the command)

B. EEO policy statements, instructions, directives and program information. Validation that command/activity issued instructions, guidance, policies and standard operating procedures related to EEO program are issued and disseminated

C. EEO Performance Element and EEO Training for Supervisors

1. Random review of supervisor, manager and HR staff performance objectives to ensure an EEO element is in place
2. List of EEO training provided and/or made available to supervisors, managers and HR staff

D. Training for Employees. List of EEO training provided and/or made available to all employees

II. Annual EEO Program Status Reports/Documentation

A. Documentation of actions taken to implement recommendations made by major command, if applicable.

B. Documentation of annual State of the Agency briefings to the EEOO and information provided to supervisors and managers.

Attachment 1

- C. Documentation to validate responses for the most recent Self-Assessment Checklist
- D. Documentation of progress, to date, on current Part H Plans
- E. Documentation of ongoing barrier analysis efforts
- F. Documentation of progress, to date, on current Part I Plans

III. Reasonable Accommodation

- A. Validation that request, tracking and monitoring system are in place
- B. Random review of reasonable accommodation case files

IV. Alternative Dispute Resolution (ADR) Program.

- A. Validation that ADR events are entered in ADR Tracker and iComplaints
- B. Trend analysis of ADR events
- C. Validation that documentation is maintained to support management decisions not to participate in ADR.

V. Discrimination Complaints Management Program.

- A. Validation that data/trend analysis of contacts received, informal and formal complaints is conducted
- B. Validation of the quality and timely processing of complaints by the EEO office
- C. Validation that information on discrimination complaints procedures, with filing and contact information, is posted and disseminated
- D. Validation of the accuracy, quality, and timeliness of complaints data input iComplaints.

VI. Anti-Harassment Program

- A. Review of current policy statement
- B. Validation that the policy has been posted and disseminated
- C. Conduct a review of the procedures and random case files for management inquiries on allegations of harassment

D. Validation that reporting requirements are met

VII. Special Emphasis Programs

A. Hispanic Employment Program

1. Implementation of Major Command's Hispanic Employment Program Plan, as directed

2. Documentation of progress, to date, to include ongoing barrier analysis efforts, on current Part K Plan

3. Copy of committee charter, if applicable.

4. Review of events/activities, to include outcome/results, to ensure linkage with any identified barriers

B. People with Disabilities Program

1. Review of Program Plan

2. Documentation of progress, to date, to include ongoing barrier analysis efforts, on current Part J Plans.

3. Copy of committee charter, if applicable

4. Review of events/activities, to include outcome/results, to ensure linkage with any identified barriers

5. Accessibility studies

C. Federal Women's Program (FWP)

1. Documentation of ongoing barrier analysis efforts

2. Copy of committee charter, if applicable

3. Review of events/activities, to include outcome/results, to ensure linkage with any identified barriers

D. American Indian/Alaskan Native (AI/AN) Employment Program

1. Documentation of ongoing barrier analysis efforts

2. Copy of committee charter, if applicable.

3. Review of events/activities, to include outcome/results, to ensure linkage with any identified barriers

E. Asian American/Pacific Islander (AA/PI) Employment Program

1. Documentation of ongoing barrier analysis efforts

2. Copy of committee charter, if applicable

3. Review of events/activities, to include outcome/results, to ensure linkage with any identified barriers

F. Black Employment Program (BEP).

1. Documentation of ongoing barrier analysis efforts

2. Copy of committee charter, if applicable

3. Review of events/activities, to include outcome/results, to ensure linkage with any identified barriers

VIII. Collaboration with HR. Documentation/discussion of collaborative efforts between HR and EEO in all employment processes to include the Federal Equal Opportunity Recruitment Program and Disabled Veterans Affirmative Action Program

IX. Community Outreach Efforts. Validation that community outreach activities relate back to program areas identified by the activity during their ongoing barrier analysis efforts

DON EEO PROGRAM ASSESSMENTS

SECTION 4

AD HOC PROGRAM REVIEWS/OTHER REQUIRED ASSESSMENTS

I. SPECIAL REVIEW OF ACTIVITY LEVEL EEO PROGRAMS

A. Purpose. There may be situations or events that require a more in-depth review of the EEO Programs at the activity level by the DON Office of EEO and Diversity Management. This review will be conducted on an as needed basis and will involve the appropriate major command(s).

B. Scope of Review. The scope of this more in-depth program review will depend on the circumstances requiring it. It may include the total program or it could focus on one particular component, e.g., discrimination complaints. Correspondence prior to the visit will provide more information. At a minimum, Attachment 1 of Section 3 of this Subchapter will provide the scope of review.

II. CIVILIAN HUMAN CAPITAL MANAGEMENT ASSESSMENT PROGRAM

A. Purpose. Reference (m) requires all DON major commands and subordinate activities to maintain effective systems for assessing and evaluating civilian HRM programs (both personnel and EEO), results and accountability. Accountability includes compliance with law, regulation and policy, as well as ensuring that HRM supports mission accomplishment.

B. Shared Assessment Goals of Civilian Human Capital Management Assessment Program Requirements. DON EEO Program policy (reference (h)) requires commands/activities to submit an Annual EEO Program Status Report that describes the results of its ongoing self-assessment efforts in compliance with reference (f).

1. The Executive Summary of the Annual EEO Program Status Report provides a succinct narrative of the status of the overall EEO program, discusses any problems discovered during its self-assessment, reports on the barriers identified as a result of its barrier analyses, and briefly outlines what activities will be undertaken to address program deficiencies and plans to eliminate the identified barriers. Part F of the Annual Report further requires the EEO Officer to certify that it has a continuing program of EEO that is consistent with the requirements outlined in EEOC MD-715.

2. As described above, these self-assessment requirements are consistent with the Civilian Human Capital Management Assessment Program requirements to maintain effective systems for assessing and evaluating civilian HRM programs, results and accountability.

C. Policy and Reporting Requirements. In the interest of ensuring the effective use of resources and to avoid duplication of effort, activity and/or major command self-assessment efforts as documented in its Annual EEO Program Status Report will meet most of the assessment and evaluation requirements of reference (m). However, the activity or major command must accomplish applicable requirements of the Civilian Human Capital Management Assessment Program that are not covered in reference (f).

III. NAVAL INSPECTOR GENERAL (NAVINSGEN)

A. Purpose. Per references (j) and (l), NAVINSGEN shall inspect, investigate, assess or inquire into any and all matters of importance to DON with particular emphasis on readiness, including, but not limited to, effectiveness, efficiency, discipline, morale, economy, ethics and integrity, environmental protection, safety and occupational health, medical and dental matters, physical security, information systems management, personnel support services and other issues affecting quality of life, command relationships, and organizational structures.

B. Policy. NAVINSGEN, to include Inspector Generals at the DON and command levels, will determine the scope of these inspections, special visits, technical inspections, special one-time inspections, inspections required by law or for the exercise of command responsibilities, and inspections conducted by “technical commanders”. No provision of this Subchapter will limit or detract from the authority and responsibilities of NAVINSGEN.