

U.S. DEPARTMENT OF AGRICULTURE
WASHINGTON, D.C. 20250

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SUBJECT: Instructions for Preparing AEP Plans, Accomplishment Reports, and Updates	DATE: July 24, 1991	
	OPI: Office of Advocacy and Enterprise/Equal Opportunity	

DEPARTMENT OF AGRICULTURE

OFFICE OF THE SECRETARY

WASHINGTON, D.C. 20250

FOREWORD

This manual sets forth procedures for preparing and submitting Multi-Year Affirmative Employment Program (AEP) Plans, Annual AEP

Accomplishment Reports, and Annual AEP Updates. The Affirmative Employment Program supports the Department's Framework for Change objective to build a diverse work force approximating the nation's labor force at entry, mid, senior and executive levels by the year 2000. All agencies will implement a strategic framework to achieve work force diversity wherever underrepresentation exists in occupational categories, series, grade levels and pay plans.

Since Departmental Notice 4310-3 expired on September 30, 1988, the Department issued several memoranda of instruction for preparing AEP plans; and reports. By issuing a single set of instructions, however, we hope to increase the Department's reporting efficiency.

Agency heads, equal opportunity staffs, and personnel staffs of every major operating component were invited to review and comment on this manual during its development. Their comments were numerous and thoughtful; each was considered and most were incorporated. Those who must develop and implement the plans and reports, therefore, have shaped this document to meet the needs of the Department's major operating components, the needs of the Department, and the requirements of legislative and other oversight bodies.

Should you wish further information about the instructions or the plans and reports referenced in this manual, please contact the Office of Advocacy and Enterprise.

Charles R. Hilty

Associate Deputy Secretary

1 PURPOSE

This manual establishes U.S. Department of Agriculture (USDA) reporting requirements and prescribes policies, procedures, guidance, and formats for preparing Multi-Year Affirmative Employment Program Plans, Annual AEP Accomplishment Reports, and Annual AEP Plan Updates. These procedures apply to all USDA components except those listed below which are exempted from the provisions of EEO-MD-714 and this manual due to the size of their work force.

Each exempted component must submit a statement signed by its head, affirming its commitment to equal employment opportunity. Form AD-1, "Commitment to Equal Employment Opportunity," will be used for this purpose (See Figure 1).

Agricultural Cooperative Service
Board of Contract Appeals
Economic Analysis Staff
Office of Administrative Law Judges
Office of Energy
Office of the Consumer Advisor
Office of the Secretary
Office of Transportation
World Agricultural Outlook Board

2 SPECIAL INSTRUCTIONS

- a Multi-Year AEP Plans, Annual AEP Accomplishment Reports, and Annual AEP Plan Updates will be prepared in accordance with EEOC Equal Employment Opportunity Management Directive 714 (EEO-MD-714, found at Appendix A) and this manual.
- b Reporting levels will coordinate the development of these plans and reports with EEO and Personnel Staffs.
- c AEP Plan requirements not specifically addressed in this manual shall be carried out in accordance with the provisions of EEO-MD-714.
- d Reporting levels will use specifically designed EEOC and AD reporting forms.
- e Reporting levels will refer to EEO-MD-714 for EEOC forms. AD forms are found in figures 1-3.
- f Reporting levels will submit AEP plans and reports to OAE within 15 days following the end of the first quarter of each fiscal year.

3 POLICY

It is the policy of the Department of Agriculture to develop department-wide Multi-Year AEP Plans, Annual AEP Accomplishment Reports and Annual AEP Plan Updates based on Major operating component (MOC) plans and reports.

This manual supplements EEO-MD-714 and establishes a system for reporting these plans and reports.

4 ABBREVIATIONS

AEP	- Affirmative Employment Program
CLF	- Civilian Labor Force
DM	- Departmental Manual
EEO	- Equal Employment Opportunity
EEOC	- Equal Employment Opportunity Commission
FAA	- Federal Affirmative Action
MICA	- Manifest Imbalance or Conspicuous Absence
MOC	- Major Operating Component
OAE	- Office of Advocacy and Enterprise
OFM/NFC	- Office of Finance and Management's National Finance Center
SRL	- Subordinate Reporting Level
PATCOB	- Professional, Administrative, Technical, Clerical, and Other White Collar occupational categories and the Blue Collar occupational category.

5 FORMS

AEP Plan Forms. The following forms will be used in preparing and submitting AEP plans and reports. The forms may be produced locally or they may be obtained from the Landover Warehouse.

- a Form AD-1, Commitment to Equal Employment Opportunity, must be submitted by MOCs exempted from the provisions of EEO-MD-714 and this manual.
- b Form AD-878, Numerical Objectives By PATCOB, will be used to report established numerical objectives for the period the AEP plans and reports cover.
- c Form AD-855, Numerical Objectives by Major Occupation, will be used to report established numerical objectives for the period the AEP plans and reports cover.

6 DEFINITIONS

- a Agency. The U.S. Department of Agriculture.
- b Major Operating Components. All USDA program components and staff offices, e.g., FmHA, FS, OP, OFM.
- c Major Occupation. One which is central to the mission of the agency or one in which there are 50 or more employees.

- d Headquarters. Lead organizational component of a MOC with primary management and administrative functions for developing and coordinating MOC-wide policies, practices, and procedures.
- e Subordinate Reporting Level. Organizational sub-unit below the MOC level with 300 or more employees.
- f Reporting Level. Each organizational level required to submit plans and reports.

7 RESPONSIBILITIES

a OAE will:

- (1) Provide technical assistance and guidance to MOCs;
- (2) Review and approve MOC and Headquarters AEP plans and reports prior to submission to EEOC;
- (3) Coordinate the development of agency-wide plans and reports;
- (4) Monitor, evaluate, and aggregate MOC-wide AEP accomplishments, goals, and objectives as a basis for developing agency AEP plans and reports;
- (5) Coordinate with EEOC, when appropriate, MOC requests for variances from the mandatory use of national CLF data and other requirements;
- (6) Monitor timely and accurate delivery of OFM/NFC generated work force data to MOCS; and
- (7) Provide periodic status reports to the Secretary and MOC heads.

b MOCs will:

- (1) Provide technical assistance and guidance to SRLs consistent with EEOC and USDA instructions;
- (2) Review and approve SRL AEP plans and reports prior to submission to the appropriate EEOC/FAA unit;
- (3) Coordinate the development of MOC AEP plans and reports, including headquarters plans and reports if applicable;
- (4) Monitor, evaluate, and aggregate headquarters and SRI, AEP accomplishments, goals, and objectives as a basis for developing MOC AEP plans and reports;
- (5) Submit MOC AEP plans and reports to OAE for review and approval, including headquarters plans; and reports if applicable; and
- (6) Submit requests for variances from the mandatory use of CLF data and other requirements to OAE.

c SRLs will:

- (1) Coordinate the development of AEP plans and reports in accordance with EEOC and USDA requirements;
- (2) Submit AEP plans and reports to MOC headquarters for review and approval prior to submission to the appropriate EEOC/FAA unit; and
- (3) Provide periodic status reports to MOC headquarters.

8 PROCEDURES

a Multi-Year Affirmative Employment Program Plan

- (1) Management must actively participate in the development of SRL, MOC, and headquarters AEP plans.
- (2) MOC's with SRLs will submit MOC plans and headquarters plans to OAE. MOCs with no SRLs will submit MOC plans only (See Appendix B).
- (3) MOC and headquarters AEP Plans are due to OAE within 15 days following the end of the first quarter of each fiscal year.
- (4) OAE will incorporate information contained in MOC plans into an agency plan.
- (5) All reporting levels will use OFM/NFC generated 4th quarter work force data as the basis for work force analyses. In addition, all reporting levels will use EEO-MD-707, Appendix B, for national CLF data comparison or other data approved by EEOC.

SRLs will compare administrative, technical, clerical, and other white-collar occupations and blue-collar occupations with appropriate geographical CLF data and will compare the professional occupations with national CLF data. Any variance from the use of these data must be approved by EEOC. SRLs may use national CLF data to compare administrative, technical, clerical, and other white-collar occupations and blue-collar occupations if they recruit nationally for these positions or if the work force analysis justifies it.

- (6) Each reporting level will submit an EEO policy statement signed by the current MOC or SRL head.
- (7) Each reporting level will provide a list, by title, of all officials with designated EEO responsibilities; e.g., MOC or SRL heads, managers, supervisors, special emphasis program managers etc., and a brief description of their respective EEO duties.
- (8) Each reporting level will prepare a Plan for the

Prevention of Sexual Harassment, identifying responsible officials, specific action items, and target dates for completing the action items.

- (9) Each reporting level will address, in narrative form, each item listed under the eight program elements in the Program Analysis (Appendix A, pp. 8-12). The narratives must accompany the plan at each reporting level. Appendix C provides guidance for conducting the program analysis.
- (10) Each reporting level will prepare a Report of Objectives and Action Items describing all problems/barriers and associated actions identified in the program analysis. Reporting levels must describe the same problems/barriers and associated actions identified on the Problem/Barrier Identification form.
- (11) Reporting levels will establish numerical objectives for each job category or major occupation where a comparison of the work force and the CLF reveals MICA in that job category or major occupation. Numerical objectives are intended to serve as a strategy for achieving work force diversity commensurate with the appropriate CLF or approved Available Labor Force data. Further, they must be:
 - (a) temporary and intended as a remedy for significant imbalances of minorities and women in the affected jobs;
 - (b) subject to change in relationship to changes in work force composition;
 - (c) designed to eliminate existing imbalances without trammeling the rights of non-minorities or maintaining numerical proportionality; and
 - (d) based on candidate availability and the number of projected vacancies.
- (12) MOC's and SRLs will consult their personnel and budget officers for assistance with vacancy projections when establishing numerical objectives.
- (13) Each reporting level will report numerical objectives on Forms AD-878 (Figure 2) and AD-855 (Figure 3), or submit DN Reports 714-6 and 7, described in section 9 d(1) of this manual.
- (14) Plan submissions for all reporting levels must include pp. 1-10 from Exhibit 1 of EEO-MD-714; Form AD-878 or DN Report 714-6, Numerical Objectives by PATCOB; and Form AD 855 or DN Report 714-7, Numerical Objectives by Major Occupation.

b Annual Affirmative Employment Program Accomplishment Report

- (1) MOCs will submit annual MOC and headquarters AEP Accomplishment Reports to OAE by the end of the first quarter of each fiscal year.
- (2) SRLs will submit Annual AEP Accomplishment: Reports to their MOC Headquarters for review and approval prior to submission to the appropriate EEOC/FAA unit.
- (3) AEP accomplishment reports must be consistent with objectives established in the Multi-Year Plan.
- (4) All reporting levels will report accomplishments on EEOC Form 568 (Appendix A, pp. 38-43).
- (5) Annual submissions will contain the following:
 - (a) Statistical Analysis - Each reporting level will conduct a statistical analysis of the work force using NFC generated 4th quarter data. The analysis should be reported in narrative form and cover the work force by PATCOB, grade groupings, grade levels, and major occupations. It must include an identification of employment trends, a description of changes in the work force, and a comparison of the current work force with that of the previous year.
 - (b) Objectives/Action Items - Each reporting level will report progress made in achieving objectives and action items, including numerical objectives. Where there has been no progress, the unit must cite the reason(s).
 - (c) Noteworthy Activities/Initiatives - All reporting levels will report noteworthy activities or initiatives implemented during the previous fiscal year.
- (6) Annual accomplishment reports for all reporting levels must include pp. 1-6 from Exhibit 3 of EEO- MD-714.

c Annual Affirmative Employment Program Plan Update

- (1) An Annual AEP Plan Update is necessary when there is a major change in the organizational structure or work force.
- (2) The following are examples of some of the items and circumstances under which an update is required:
 - (a) policy statements when MOC or SRL heads change;
 - (b) organizational charts when MOC or SRL structures change;
 - (c) program analyses, problem/barrier identification forms, reports of objectives/action items, and the

Plans for the Prevention of Sexual Harassment when there are modifications to these areas of the plan.

- (3) All reporting levels will use the appropriate pages of EEOC Form 566. To assist in identifying updates, the word "update" should be typed in the upper right hand corner of all pages.
- (4) Submissions, if appropriate, should accompany the Annual AEP Accomplishment Report.
- (5) An AEP Plan Update must address achieved and unachieved action items.

9 EEO STATISTICAL DATA

- a OFM/NFC will forward to designated reporting levels EEO statistical reports containing information which meets EEO-MD-714 requirements, assists in monitoring EEO accomplishments, and facilitates report preparation.
- b Current geographical breakouts for all EEO statistical reports that are not reported by individual states are as follows:
 - Worldwide (excluding Hawaii, Guam, and Puerto Rico)
 - Hawaii only
 - Guam only
 - Puerto Rico only
- c Requests for geographical breakouts other than those listed above must be submitted in writing to OAE
- d Accomplishment Reports for EEOC will include an "as of" date, a "run" date, and numbered pages.
 - (1) The quarterly statistical reports generated by OFM/NFC are as follows:
 - DN-714-1 - Change in Work force EEO Profile by Pay Level
 - DN-714-2 - Change in Work force EEO Profile by Series with 50 or More
 - DN-714-3 - Change in Work force EEO Profile by Pay Level
 - DN-714-4 - Distribution of EEO Groups and Underrepresentation Indices by, PATCOB and Pay Level
 - DN-714-5 - Distribution of EEO Groups and Underrepresentation Indices by, Series and Pay Level
 - DN-714-6 - Numerical Objective Accomplishments by PATCOB
 - DN-714-7 - Numerical Objective Accomplishments by Series with 50 or More

DN-714-8 - Internal Movement Goal Accomplishments by
PATCOB

DN-714-9 - Internal Movement Goal Accomplishments by
Series with 50 or More 10

DN-714-10 - Separations by PATCOB and Pay Level

DN-714-11 - Separations by PATCOB, Series, and Pay Level

DN-714-12 - Promotions by PATCOB and Pay Level

DN-714-13 - Promotions by PATCOB, Series, and Pay Level

DN-714-14 - Awards by PATCOB and Pay Level

DN-714-15 - Awards by PATCOB, Series, and Pay Level

DN-714-16 - Training Instances by PATCOB and Pay Level

DN-714-17 - Training Instances PATCOB, Series, and Pay
Level

- (2) Reports DN-714-6 through 9 will satisfy the reporting requirement of EEOC Forms 568.
- (3) OFM/NFC will divide DN-714-10 and 11 reports into two categories of voluntary and involuntary separation-type nature of action codes which are furnished by the Office of Personnel.
- (4) OFM/NFC will divide DN-714-12 and 13 reports into two categories of competitive and noncompetitive promotion-type nature of action codes which are furnished by the office of Personnel.
- (5) OFM/NFC will divide DN-714-14 and 15 reports into the following five categories:
 - (a) Quality Step Increases
 - (b) Cash Awards for Suggestions
 - (c) Cash Awards for Performance
 - (d) Cash Awards for Special Act or Service
 - (e) Cash Awards for Invention
- (6) OFM/NFC will divide DN-714-16 and 17 reports by the following types of training:
 - (a) Executive and Management
 - (b) Supervisory

- (c) Legal, Medical, Scientific, or Engineering
 - (d) Administrative Analysis
 - (e) Specialty and Technical
 - (f) Clerical
 - (g) Trade or Craft
 - (h) Orientation
 - (i) Adult Basic Education
- e EEO Tracking Reports
- (1) Employment & Goals Summary and Employment & Goals Summary by Occupational series
 - (2) Cumulative Gains & Losses Summary and Cumulative Gains & Losses Summary by Occupational Series
 - (3) Grade Distribution Summary and Grade Distribution Summary by Occupational series
 - (4) Occupational Series Summary - Percentages of Representation
 - (5) Occupational Series Summary - Average Grade
- f Other EEO Reports
- (1) Employment & Representation Index of Most Populous PATCOB Series
 - (2) Quarterly/Annual Reports of Gains & Losses

FIGURE 1

U.S. DEPARTMENT OF AGRICULTURE

COMMITMENT TO EQUAL EMPLOYMENT OPPORTUNITY

STATEMENT FOR MAJOR OPERATING COMPONENT (MOC) EXEMPTED FROM THE
PROVISIONS OF EEO-MD-714

POLICY STATEMENT

I AM AFFIRMING

(MOC NAME)

COMMITMENT TO TITLE VII OF THE CIVIL RIGHTS ACT OF 1964, AS AMENDED,

WHICH GUARANTEES EQUAL EMPLOYMENT OPPORTUNITY FOR ALL EMPLOYEES AND APPLI CANTS FOR EMPLOYMENT WITHOUT REGARD TO RACE, COLOR, RELIGION, SEX, OR NATIONAL ORIGIN. OUR OBJECTIVE IS TO PROVIDE A WORK ENVIRONMENT FREE FROM UNLAWFUL EMPLOYMENT DISCRIMINATION.

ALL MANAGERS AND SUPERVISORS ARE RESPONSIBLE FOR SUPPORTING USDA AND ----- POLICY ON EQUAL
(MOC NAME)

EMPLOYMENT AND ARE HELD ACCOUNTABLE FOR ASSURING THAT THE WORK PLACE IS FREE FROM DISCRIMINATION. ALL PERSONNEL PRACTICES INCLUDING

RECRUITMENT, SELECTION, TRAINING, PROMOTION, TRANSFER, AND BENEFITS ARE REQUIRED TO BE FREE FROM UNLAWFUL DISCRIMINATION.

SIGNATURE OF MOC HEAD OR DESIGNATED OFFICIAL

NAME AND TITLE

DATE

FORM AD-1 (11/87)

CONTACT OIRM, IMD on 202-720-8799 for the paper copy of the following images: Figure 2, Numerical Objectives By PATCOB, Form AD-878 (11/87); Figure 3, Numerical Objectives By Major Occupation, Form AD-855 (11/87).

APPENDIX A

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

EQUAL EMPLOYMENT OPPORTUNITY

MANAGEMENT DIRECTIVE

EEO-MD-714

DATE OCTOBER 6, 1967

TO THE HEADS OF FEDERAL AGENCIES:

1. SUBJECT. Instructions for the Development and Submission of Federal Affirmative Employment Multi-Year Program Plans, Annual Accomplishment Reports, and Annual Plan Updates for FY 1988 through FY 1992.
2. PURPOSE. To prescribe to Federal agencies instructions, policies, procedures, guidance, and formats for the development and submission of:
 - a. Multi-year affirmative employment program plans,
 - b. Annual affirmative employment program accomplishment reports, and
 - c. Annual affirmative employment program plan updates.
3. EFFECTIVE DATE. October 1, 1987.
4. ORIGINATOR. Federal Sector Programs, Office of Program Operations, Equal Employment Opportunity Commission (EEOC).
5. OBSOLETE DATA. EEO-MD-707 and EEO-MD-707A are canceled as of January 1, 1988.
6. AUTHORITY. These instructions are prepared pursuant to EEOC's authority under Section 717 of the Civil Rights Act of 1964, as amended, 42 USC 2000e-16; Reorganization Plan No. 1 of 1978, issued pursuant to 5 USC 901 et. seq.; Executive Order 11748 (3 CFR, 1966-70 Comp., p. 803) as amended by Executive Order 12106 (3 CFR 1978 Comp., p. 263); and 29 CFR Part 1613. specific sources of authority and guidance are further explained in Appendix E of this document.
7. POLICY INTENT. The intent of the Commission in issuing this Directive is to develop a systematic multifaceted methodology for affirmative employment programs which require:
 - o Strong commitment by the Head of the Agency through a clear delegation of authority to Senior Managers;
 - o Management accountability systems for holding Senior Managers responsible for achieving Agency EEO objectives;
 - o Identification and removal of barriers at all levels of the work force;
 - o Aggregation of the agency work force into agencywide, major

operating component (MOC) wide, commandwide, regionwide, and installation program plans;

- o The use of prescribed program elements to analyze program needs and a reporting mechanism to monitor progress in resolving problems;
- o Annual reports, submitted in a timely manner, on program accomplishments in addition to reports on statistical changes in the agencies' work force profiles; and
- o Objectives and actions that lead to positive meaningful results.

Also, the intent of the Commission in issuing these program instructions is to allow for:

- o Flexibility in agency problem solving activities, by allowing each agency to decide which objectives and actions will meet their EEO program needs;
- o Reduction of at least 40% of the paperwork burden placed on agencies; and
- o Numerical goal setting where there is a manifest imbalance or conspicuous absence of minorities and women in the agency's work force.

The Management Directive should substantially contribute to the achievement of equal employment opportunity for all Federal employees, not only when hired; but also as they advance within the work force, by providing for a stronger, more effective, more focused affirmative employment program. This will be accomplished by:

- o Shifting major responsibility and accountability to Agency Heads and their designees;
- o Focusing on specific problems within specific agencies rather than general issues identified by generalized instructions;
- o Eliminating unnecessary forms;
- o Using Central Personnel Data File (CPDF) information, where available and appropriate, in the work force analysis;
- o Placing specific emphasis on identification and removal of barriers so that elimination of problem areas are permanent and not just the result of a short-term effort; and
- o Requiring a five-year planning document with annual accomplishment reports.

The Commission intends to strengthen evaluation and accountability by:

- o Conducting one or more onsite program reviews at each agency

during the five-year cycle;

- o Placing more emphasis on onsite program audits to evaluate agency programs;
- o Continuing use of labor force data for comparison with agency work force profiles;
- o Requiring Federal agencies to have self evaluation programs;
- o Mandating that additional program elements be addressed when agencies fail to show progress; and
- o Reporting on a yearly basis, findings as to the extent to which agencies are in compliance with Title VII of the Civil Rights Act of 1964, as amended, to the President, the Congress, and the appropriate Committees of the Congress.

8. APPLICABILITY AND SCOPE.

These instructions apply to all executive agencies as defined in section 102 of Title 5, U.S.C. (including those with employees and applicants for employment who are paid from nonappropriated funds), the United States Postal Service, the Postal Rate Commission, and those units of the legislative and judicial branches of the Federal Government having positions in the competitive service.

9. RESPONSIBILITIES.

a. Agency Heads are responsible for the following:

- (1) Ensuring compliance with affirmative employment program instructions issued by EEOC;
- (2) Establishing agencywide objectives, consolidating and submitting agencywide multi-year affirmative employment program plans, providing current guidance for the development of program plan to all components/field installations, developing systems for evaluation of program effectiveness, and preparing accomplishment reports and plan updates for timely submission to the EEOC;
- (3) Ensuring that all managers under the Senior Executive Service are held accountable for tile achievement of affirmative employment objectives and the fulfillment of equal employment opportunity requirements and objectives established by the agency; and
- (4) Ensuring the accuracy of work force data submitted to the Office of Personnel Management's Central Personnel Data File (CPDF).

b. Major Operating Components (MOCs). Commands, Regions, and Designated Installations are responsible for preparing, submitting, and implementing plans that fulfill agencywide

objectives.

- c. EEOC is responsible for:
 - (1) Reviewing and evaluating the operation of all. agency equal employment opportunity programs;
 - (2) Reviewing and approving agency plans and reports, communicating the results of evaluations to each agency, and directing agencies, as appropriate, to develop additional program objectives;
 - (3) Providing technical assistance to agencies;
 - (4) Providing CPDF data to agencies annually; and
 - (5) Submitting an annual report to the Congress and the appropriate committees of the Congress and the President on the employment of minorities and women in the Federal Government based upon agency reports of accomplishments during the fiscal year, data from the Central Personnel Data File, onsite program reviews, and audits.

10. DEFINITIONS.

- a. Action Item. Clearly identified step to the attainment of an objective.
- b. Agency. All government entities including executive agencies as defined in Section 102 of Title 5, U.S. Code (including those with employees and applicants for employment who are paid from nonappropriated funds), the United States Postal Service, the Postal Rate commission, and those units of the legislative and judicial branches of the Federal Government having positions in the competitive service.
- c. Audit. Enforcement tool to be used when there are sufficient deficiencies in an agency's program operations.
- d. Barrier. Personnel principle, policy, or practice which restricts or tends to limit the representative employment of applicants and employees, especially minorities, women and individuals with handicaps.
- e. Civilian Labor Force. Persons, 16 years of age or over, excluding those in the Armed Forces, who are employed or seeking employment.
- f. Conspicuous Absence. Particular EEO group that is nearly or totally nonexistent from a particular occupation or grade level in the work force.
- g. EEO Group. Black males, black females, Hispanic males, Hispanic females, Asian American/Pacific Islander, males, Asian American/Pacific Islander females, American Indian/Alaskan Native males, American Indian/Alaskan Native females, white males, and white females. 1/

- h. Employee. Permanent, full or part-time, members of the agency work force including those in excepted service positions. Does not include temporary or intermittent individuals.
- i. Employment Category. The major occupational Categories for the White Collar pay system and wage board pay system including: Professional, Administrative, Technical, Clerical, and Other, and Blue-Collar (PATCOB).
- j. Fiscal Year. Reporting period from October 1 of one year to September 30th of the following year.
- k. Major Occupation. Mission oriented occupations or other occupations with 100 or more employees.
- l. Major Operating Component (MOC). Organizational sub-unit directly below the agency (department) level.
- m. Manifest Imbalance. Representation of EEO groups in a specific occupational grouping or grade level in the agency's work force that is substantially below its representation in the appropriate CLF.

1/ Handicapped males and females are also considered EEO groups but are covered by a separate Management Directive issued pursuant to Section 501 of the Rehabilitation Act of 1973, as amended. See EEO-MD-713.

- n. Numerical Objectives (Goals). Quantifiable objective designed to eliminate a manifest imbalance or conspicuous absence of EEO Groups.
- o. Objective. Statement of a specific end product or condition to be attained by a specific date. Accomplishment of an objective will lead to the elimination of a barrier or other problem.
- p. Onsite Program Review. Visit by EEOC representatives to an agency installation for the purpose of reviewing program areas such as program management, data collection, monitoring and evaluation, personnel practices, barrier analysis, prevention of sexual harassment, training and recruitment.
- q. Technical Assistance. Onsite visit to provide assistance and training.
- r. Problem. A situation that exists in which one or more EEO groups do not have full equal employment opportunity.
- s. PATCOB. Acronym for Professional, Administrative, Technical, Clerical, and Other White-Collar occupational categories and the Blue-Collar occupational category.
- t. Program Analysis. Review of entire agency affirmative employment program.

- u. Program Element. Prescribed program area for assessing where agencies should concentrate their affirmative employment program analysis and plan development.
- v. Responsible Official. Executive, Manager, or Supervisor who is accountable for accomplishing an action item.
- w. Small Agencies. Agencies with fewer than 500 employees.
- x. Target Date. Date (month/year) for completion of an action item.

11. POLICIES AND PROCEDURES.

The attached instructions contain requirements for Federal agency affirmative employment program planning and reporting. The EEOC will provide technical assistance and training necessary to assist agencies in the development of comprehensive five-year programs to accomplish EEO objectives. Plan elements and procedures for submission and approval, and other requirements for Fiscal Years 1988 through 1992, are described below.

12. REPORTING LEVELS FOR PREPARATION AND SUBMISSION OF MULTI-YEAR AFFIRMATIVE EMPLOYMENT PROGRAM-PLANS, ANNUAL ACCOMPLISHMENTS, AND ANNUAL UPDATES.

Planning and Reporting Levels. These instructions require development and submission of multi-year affirmative employment program plans, annual accomplishment reports, and updates in a timely manner, by agencies with 500 or more employees, departments, major operating components (MOCs), commands, and regional offices.

Also, installations with 2000 or more employees are required to develop and submit multi-year affirmative employment program plans and annual accomplishment reports and updates.

All plans and reports must be approved and signed by the principal official of the agency, department, MOC, command, regional office, or installation. (See Figure 3 for chart of planning and reporting levels.)

- a. Agency. Agencies with 500 or more employees shall aggregate multi-year affirmative employment program plans and annual accomplishment reports and updates from subordinate units (if any) and submit an agency-wide plan/report/update to EEOC's Federal Sector Programs.
- b. Region, Major Operating Component (MOC) or Command. Regions, MOCS, and commands shall be responsible for developing and submitting multi-year affirmative employment program plans and annual accomplishment reports and updates. Plans, reports and updates for regions, MOC'S, and commands shall include all subordinate installations and be submitted first to the next higher organizational level, and then to the appropriate EEOC

office.

- c. Installations with 2000 or More Employees. Installations with 2000 or more employees shall be responsible for developing and submitting multi-year affirmative employment program plans and annual accomplishment reports and updates. Plans, reports, and updates are to be submitted to the appropriate EEOC distribution office and the agency's next higher organizational level. The installation's plans, reports, and updates shall be included in combined regional, MOC, or agency plans, reports and updates. Agency Headquarters offices shall be considered an installation for planning and reporting purposes if it has 2000 or more employees (these plans/reports/updates shall be submitted to EEOC's Federal Sector Programs).
- d. Small Agencies. Small agencies with fewer than 500 employees are not required to develop plans or to submit an annual report. Small agencies shall submit a statement, signed by the agency head, affirming the agency's commitment to equal employment opportunity. This statement shall be submitted once at the beginning of the five-year reporting period. EEOC will monitor agency work force profiles with CPDF reports annually. (See Exhibit 2, EEOC Form 567).

13. MULTI-YEAR PLAN DEVELOPMENT.

Agencies with 500 or more employees are required to submit the following to EEOC.

- a. Program Analysis. The first step in the multi-year affirmative employment program (AEP) plan is to conduct a comprehensive program analysis of the current status of all affirmative employment efforts within the agency. Subordinate units shall conduct a program analysis for submission to the next higher organization level. Each organizational level shall aggregate analyses submitted by their respective subordinate units. For program analysis and planning purposes, the AEP is divided into eight program elements. Agencies and their subordinate units must use all of these program elements in conducting their analysis, but may use some or all of these program elements in developing their plans.
 - (1) Organization and Resources
 - (a) Does EEO staff office or director have direct access to top management and lines of communication to agency supervisors
 - (b) Are EEO program officials receiving adequate training in EEO, personnel, administration, and management to effectively resolve problems and issues within their areas of responsibility?
 - (c) Are adequate management and fiscal controls

established to monitor all resources allocated to the EEO program?

- (d) Do special emphasis program managers devote sufficient time to accomplish program objectives? Do these managers have adequate delegations of authority to promote programs and to accomplish program objectives?
 - (e) Are EEO officials providing technical advice to management officials and the personnel office?
 - (f) Have supervisory and management personnel attended formal training including coverage of their equal employment opportunity responsibilities?
 - (g) Has incentive awards system been used to recognize supervisory and managerial personnel for their understanding and support of, and accomplishments in equal employment opportunity?
 - (h) Do performance evaluations of supervisory and managerial personnel include specific factors for evaluating understanding, support, and achievement of equal employment opportunity?
- (2) Work Force
- (a) Analysis of the agency's work force by PATCOB category, grade groupings, and major occupations.
 - (b) Comparison of the agency's work force with the previous year's work force.
 - (c) Comparison of the agency's work force with the appropriate civilian labor force (CLF). See Appendix C for examples.
- (3) Discrimination Complaints
- Does an analysis of the bases, issues, and findings of recent complaints suggest possible problem areas that may need to be explored?
- (4) Recruitment and Hiring
- (a) Do present recruitment sources yield qualified minority and female applicants who meet organizational needs?
 - (b) Have qualification requirements and procedures for hiring been examined to determine whether barriers to EEO exist?
 - (c) Does recruitment literature reflect the agency's desire to reach all segments of the potential work force?

- (d) Do EEO officials participate in the development of vacancy projections?
 - (e) Are recruitment efforts coordinated within the agency in order to obtain maximum effectiveness and efficiency, where appropriate?
 - (f) Do EEO officials provide technical assistance to the personnel office and monitor, as well as participate in recruitment efforts?
 - (g) Is the selection process reviewed periodically to ensure equal treatment regardless of race, color, religion, sex, national origin, or age?
 - (h) When paid advertising is used for recruitment or institutional purposes, is minority media included?
 - (i) Does management make itself available to community, civic, and other groups interested in enhancing equal employment opportunity?
 - (j) Does the agency participate in cooperative efforts with Federal and other organizations to resolve employment related problems in the community, including needs for improved public transportation, education, child day care, and community services?
 - (k) Does the agency provide opportunities and services to the community such as cooperative education programs and shared use of training facilities?
 - (l) Does the agency participate in community career information programs, conferences, and occupational study projects?
 - (m) Has the agency examined means for expanding worker-trainee placement? Do current plans call for maximum participation in the Worker- Trainee Opportunities program, or other such programs, with particular emphasis on the identification of developmental positions?
- (5) Employee Development Programs
- (a) Are systems for tracking information on employee skills and training in operation?
 - (b) Has a survey of current skills and training of the agency's work force been conducted to determine the availability of employees from the EEO Groups, having skills required to meet agency staffing needs?
 - (c) Have studies been conducted on time-in-grade to determine the reasons for any differentials which

may exist by minority status and sex?

- (d) Have studies been conducted to examine relative upward movement of employees to full performance, professional, supervisory, and highest grade levels?
 - (e) Is career counseling available to all employees?
 - (f) Are efforts being made to ensure that appropriate training opportunities are available to employees at all grade levels and in all occupational areas, without regard to minority status and sex?
 - (g) Is the agency encouraging the use of programs that emphasize outside educational opportunities?
- (6) Promotions
- (a) Are internal selection and promotion qualification requirements and procedures valid and job-related, and include no unnecessary barriers to full utilization of skills and training?
 - (b) Are efforts being made to ensure that appropriate promotional opportunities are available to employees at all grade levels and in all occupational areas, regardless of minority status and sex?
- (7) Separations
- (a) Are efforts made to ensure that separations are conducted fairly and in a non-discriminatory manner?
 - (b) Are Reductions-in-Force conducted fairly in a non-discriminatory manner?
- (8) Program Evaluation
- (a) Are findings from EEOC onsite Reviews and Agency program evaluations being incorporated into the annual AEP plan development process, if appropriate?
 - (b) Do EEO committees, where established, consult with the EEO officer, personnel officer, and management officials to ensure that each provides input to EEO program evaluation?
 - (c) Are statistical data necessary for EEO program evaluation accurate, timely, and accessible?
 - (d) Are staff responsible for EEO program evaluation fully trained in EEO and merit system requirements contained in EEOC and OPM regulations?
 - (e) Do EEO program evaluations include input from special emphasis program managers and EEO committees?

- b. Problem and Barrier Identification, After conducting a program analysis of the affirmative employment program within the agency, then problems and barriers shall be identified. A critical part of agency multi-year affirmative employment program planning is an evaluation of agency personnel and management policies, practices, systems, and procedures which may serve as problems and barriers to employment for EEO Group(s). Problems and barriers shall be examined in the context of the entire employment process. (See Appendix D).

The following elements must be used as basic criteria applicable to problem and barrier identification within each agency:

- (1) Agencies shall select problems and barriers within their control (and only within their control).
 - (2) Agencies shall select problems and barriers that can be eliminated within the five-year cycle.
 - (3) Agencies shall select problems and barriers affecting PATCOB categories and major occupations and identify specific actions to eliminate each problem and barrier.
- c. Report of Objectives and Action Items. The next step in the development of a multi-year affirmative employment program is the preparation of a report containing the following:
- (1) A clear statement of specific and measurable objectives and supporting action items which will resolve problems identified.
 - (2) Assignment of a responsible official for each objective and action item listed.
 - (3) A target date for completion of each objective and action item.

See Exhibit 1 for a sample. (EEOC Form 566, p.10).

After, review of an agency's Report of Objectives and Action Items, the EEOC may direct, after discussion with the agency, the development of additional objectives and action items.

- d. Numerical Objectives (Goals). Agencies may establish numerical objectives (goals) for each job category or major occupation where there is a manifest imbalance or conspicuous absence of EEO Group(s) in the work force. Numerical objectives (goals) shall be used in accordance with the following guidance.
- (1) Agencies should review the Supreme Court decision, Johnson v. Transportation Agency, Santa Clara County, 107 S. Ct. 1442 (1987).
 - (2) The agency must conduct an appropriate work force

analysis. Where the work force representation of EEO Groups is below their corresponding civilian labor force (CLF) representation so that a conspicuous absence or manifest imbalance exists, the agency may develop reasonable numerical objective (goals) to address the absence or imbalance.

- (3) Agencies should use Appendix B of EEO-MD-707 for Civilian Labor Force (CLF) data comparisons. Any deviation from this data base must be approved by EEOC, Federal Sector Programs, Washington, D.C.
- (4) Numerical objectives (goals) must be reasonable. They must have a reasonable relation to the extent of manifest imbalance or conspicuous absence, the availability of candidates and the number of vacancies. The availability of candidates is dependent on effective community outreach, agency, recruitment, applicant flow, relevant qualifications, training, and promotions.
- (5) Agencies should consult with their personnel and budget officers for assistance with their vacancy projections.
- (6) Numerical objectives (goals) do not require or mandate the selection of unqualified persons or preferential treatment based on race, national origin or sex. The purpose of numerical measures is to attain, rather than maintain a balanced work force.
- (7) Agencies should use the form in Exhibit 3 (EEOC Form 568, p. 4) to monitor, measure, and evaluate progress made as a result of the use of their numerical objectives (goals). After a review of the agency's program plan, EEOC may direct the development of additional numerical objectives.

14. REPORTING REQUIREMENTS.

- a. Multi-Year Requirements. Agencies shall submit multi-year requirements on a staggered basis to the EEOC, beginning February 15, 1988. Each agency will be notified of the due date for its submission. All agencies with 500 or more employees shall submit items 1 through 9 specified below. These items are required only once during the five-year reporting period. Once submitted to EEOC, they may be referenced in subsequent years. Any update or change should be submitted to EEOC. (See Exhibit 1, EEOC Form 566, pp. 1-10).
- (1) Policy Statement. The head of each agency shall submit a signed policy statement. This statement should affirm that equal employment opportunity and affirmative employment program requirements will be enforced by the agency head and agency management. The policy statement should include, but not be limited to the following:

- (a) Equal employment opportunity for all employees and applicants for employment, regardless of their race, religion, color, sex, national origin, age or handicap is an integral part of agency policy.
 - (b) Equal employment opportunity policy requires affirmative employment program efforts throughout the agency to overcome past employment practices that have operated to restrict opportunities for employment.
 - (c) Equal employment opportunity covers all employment practices including, but not limited to, recruitment, hiring, promotion, transfer, reassignments, training, benefits, and separation.
 - (d) Managers, supervisors, EEO Officers, and personnelists share responsibility for successful implementation of the affirmative employment program. Performance appraisals should include an element based on meeting equal employment opportunity objectives.
- (2) Delegation of Authority. This provides a clear delineation of the specific duties and responsibilities of Affirmative Employment Program officials.
 - (3) Organizational Chart. Agencies shall submit an organizational chart with MOC's/components/ installations required to submit plans/reports by this directive.
 - (4) Certification of Qualifications. Agencies shall submit a certification of qualifications for principal officials responsible for implementing the EEO program.
 - (5) Plan for the Prevention of Sexual Harassment. Agencies must develop a comprehensive plan of action to prevent sexual harassment in the work place. Agencies must submit the following information:
 - (a) Specific steps to inform employees that complaints of sexual harassment are cognizable under Title VII. Existing EEO Complaint System must be structured to deal sensitively with sexual harassment issues.
 - (b) Training, directives, or other programs designed to inform supervisors and other agency personnel of their responsibilities to discourage explicit or implicit unwelcome advances or physical conduct of a sexual nature in order to maintain a work place free of sexual harassment.
 - (c) Amendments to agency codes of conduct or other policy directives/materials designed to curtail inappropriate conduct.
 - (d) Method(s) to ensure accountability within the agency

for maintaining a work place free of sexual harassment.

- (e) Any other initiatives already undertaken to educate employees of their rights and responsibilities.
- (6) Statement of Monitoring and Evaluation System. Agencies shall submit a narrative describing their agency's monitoring and evaluation system. Internal monitoring and evaluation systems must include, at a minimum:
- (a) Information systems that will provide periodic status reports on work force profile and affirmative employment efforts.
 - (b) Capability to monitor employment trends through review of personnel transactions and other historical data.
 - (c) Integration of barrier analyses; elimination of impediments; innovative staffing techniques and concomitant revisions in agency selection procedures.
 - (d) Capability to integrate comprehensive management, personnel, and budget planning with affirmative employment planning.
 - (e) Capability to review proposed personnel actions which affect categories where objectives have been established.
- (7) Program Analysis. Agencies must conduct a program analysis of the current status of affirmative employment within the agency. Subordinate units shall conduct a program analysis for submission to the next higher organization level. Each organizational level shall aggregate analyses submitted by their respective subordinate units. For program analysis and planning purposes, the AEP is divided into eight program elements:
- (a) Organization and Resources
 - (b) Work Force
 - (c) Discrimination Complaints
 - (d) Recruitment and Hiring
 - (e) Employee Development Programs
 - (f) Promotions
 - (g) Separations, and
 - (h) Program Evaluation.
- (8) Problem and Barrier Identification. Agencies shall evaluate agency personnel and management policies, practices, systems, and procedures which operate as problems and barriers to employment for each EEO Group. Problems and barriers shall be examined in the context of the entire recruiting and staffing process.

The following elements must be used as basic criteria applicable to problem and barrier identification within each agency:

- (a) Agencies shall select problems and barriers within their control.
 - (b) Agencies shall select problems and barriers that can be eliminated within the five-year cycle.
 - (c) Agencies shall select problems and barriers affecting PATCOB categories and major occupations and identify specific actions to eliminate each problem and barrier.
- (9) Report of Objectives and Action Items. Agencies shall prepare a report containing the following:
- (a) A clear statement of specific and measurable objectives and supporting action items which will solve problems identified.
 - (b) Assignment of a responsible official for each objective and action item listed.
 - (c) A target date for completing each objective and action item.
- b. Annual Affirmative Employment Program Requirements. Annual submissions will be submitted to EEOC on a staggered basis beginning February 15, 1988, in a timely manner. Each agency will be notified of the due date for its submission. Annual submissions will contain the following (See Exhibit 3, EEOC Form, 568):
- (1) Statistical Analysis. Annually, the EEOC will transmit to agencies copies of their CPDF data. Using CPDF data, as of September 30, or substitute data, as of September 30, where appropriate, agencies shall provide EEOC with a statistical analysis of their work force. This should include an analysis of the agency's work force by PATCOB category, grade groupings, and major occupations; and analysis of the agency's work force for the current year and previous year; identification of employment trends; and a description of changes in the work force. (See Appendix A and C for guidance on work force analysis and reporting forms).
 - (2) Annual Accomplishment Reports and Updates. Agency accomplishment reports shall reflect the progress made in achieving objectives and action items. Agency updates shall address achieved and unachieved action items.
 - (3) Noteworthy Activities/Initiatives. Agencies should submit noteworthy activities or initiatives implemented during the fiscal year for inclusion in EEOC's annual report to the Congress and the President.

15. EVALUATION AND ENFORCEMENT

a. Evaluation.

Agencies will be evaluated on the effectiveness of their affirmative employment program efforts. In reviewing changes in the work force, EEOC will use the comparative analyses provided by the agency.

EEOC will use the following criteria in evaluation of an agency's progress:

- (1) Positive change in the participation of EEO Groups in the work force. With good faith efforts, the EEO Groups should increase in major occupations and occupational levels within the agency's work force.
- (2) Successful hiring and internal movement activity.
- (3) Successful completion of plan of action.
- (4) Completeness and accuracy of required information.
- (5) Effectiveness of an Agency's internal monitoring and evaluation system.

In evaluating an agency's affirmative employment program plan, EEOC shall carefully review all program elements, objectives and action items to ensure that they adequately address the problems identified. Where appropriate, after discussions with the agency, the EEOC may and will recommend the use of additional program elements, the development of additional objectives (including numerical goals) and action items.

b. Enforcement.

- (1) Program Audit. EEOC will conduct a full program audit of any agency which fails to meet the requirements of this directive in developing and implementing an affirmative employment program or if its program efforts show insufficient progress.

The program audits will include a thorough examination of the agency's affirmative employment program objectives, strategies, procedures, and accomplishments. The audit will cover the following:

- (a) The management of the agency program;
- (b) The resources allocated to the program;
- (c) the alternative strategies considered to bring about positive change in the participation of each EEO group in the work force; and
- (d) The extent to which the agency was committed to the

objectives of the affirmative employment program.

EEOC will communicate its program audit findings to the responsible agency official. The agency will be provided an opportunity to respond to EEOC's findings.

- (2) EEOC May Direct Additional Objectives and Strategies. If the EEOC review of agency progress under the agency's affirmative accomplishment program reveals a continuing manifest imbalance, the EEOC may direct or require that additional steps be taken to identify and remove barriers to equal employment opportunity and may also direct or require the development of numerical objectives (goals).
- (3) Report to Congress and the President. EEOC will report to Congress, the appropriate committees of the Congress, and the President annually on each agency's affirmative employment program efforts. The report will include analysis of changes in the Agency's work force.

c. Onsite Reviews.

EEOC will continue to conduct onsite review of selected agencies to evaluate their affirmative employment programs. Affirmative Employment Program planning areas to be reviewed are:

- (1) program management;
- (2) data collection;
- (3) monitoring and evaluation;
- (4) personnel practices;
- (5) barrier analysis;
- (6) prevention of sexual harassment;
- (7) training; and
- (8) recruitment.

EEOC will conduct an onsite review of each agency's affirmative employment program at least once during the multi-year cycle.

16. LIST OF FIGURES.

Figure	Title
1	Affirmative Employment Program Schedule
2	Flow Chart for Affirmative Employment Planning Process - FY 1988 through FY 1992
3	Planning and Reporting Levels
4	Map of EEOC Federal Affirmative Employment Program Regions
5	EEOC Field Offices with Federal Affirmative Employment Units

17. LIST OF EXHIBITS.

EEOC Forms 566 through 568 are to be used for agency reporting.

Exhibit	Title
1	Multi-year Affirmative Employment Program Plan. FORM 556 (pp. 1-10)
2	Commitment to Equal Employment Opportunity Statement for Agencies with 500 or fewer Employees. FORM 567
3	Annual Affirmative Employment Program Report and Update. FORM 568 (pp. 1-6)

18. LIST OF APPENDICES.

Appendix	Title
A	Analysis of CPDF Data
B	Data Formats for Central Personnel Data File Information
C	Examples - Analysis of Work Force Data
D	Examples of Problem and Barrier Analysis/Identification
E	Legal Authorities

19. SUPPLY OF FORMS.

If supplies of EEOC forms are needed, agencies may produce them locally or if 50 or more copies are needed, agencies may contact:

Federal Sector Programs
Equal Employment Opportunity Commission
2401 E Street, N.W., Room 422
Washington, D.C. 20507

20. INQUIRIES.

Further information concerning this directive may be obtained by contacting:

Director
Affirmative Employment Programs Division
Federal Sector Programs
2401 E Street, N.W., Room 422
Washington, D.C. 20507

Telephone: (202) 634-6753

Interagency Report Control Number: 0279-EEO-AN This reporting

requirement has been cleared in accordance with FIRM 201-45.6 and assigned Interagency Report Control Number: 0279-EEO-AN

Clarence Thomas
Chairman
Equal Employment Opportunity Commission

FIGURE 1

AFFIRMATIVE EMPLOYMENT PROGRAM SCHEDULE

Date	Plan Elements and Activities
July 1987	EEOC forwards CPDF data to agencies.
July 1987	EEOC distributes draft directive to agencies for Interagency Coordination.
August 1987	EEOC receives comments from agencies.
October 1987	Directive is issued to agencies for implementation
Beginning February 15, 1988 (staggered basis)	Agencies submit multi-year requirements.
August 15, 1988, through 1992	Annually, EEOC forwards CPDF data to agencies.
Beginning accomplishment February 15, 1989, through 1992 (staggered basis)	Agency submission of annual report and plan update, statistical analysis of work force, and noteworthy activities/initiatives.

FIGURE 2

FLOW CHART
MULTI-YEAR AFFIRMATIVE EMPLOYMENT PROGRAM PLANNING PROCESS
FISCAL YEAR 1988 THROUGH FISCAL YEAR 1992

STEP	ACTION	EXPLANATION
1.	PROGRAM ANALYSIS	Conduct a Program Analysis of the current status of the affirmative employment program within the agency.
2.	IDENTIFICATION OF PROBLEM/BARRIERS	Evaluation of agency policies, procedures, and systems which may affect the employment of minorities and women.
3.	DEVELOPMENT OF OBJECTIVES AND ACTION ITEMS	Statement of objectives which will resolve each problem identified. Each objective contains action items, an official responsible for accomplishing the action item, and target dates for action.
4.	SUBMISSION OF MULTI-YEAR AFFIRMATIVE EMPLOYMENT PROGRAM PLANS	Agency submits multi-year plan requirements: Policy Statement, Delegation of Authority, Organization Chart, Certification of Qualifications, Plan for the Prevention of Sexual Harassment, Statement of Monitoring and Evaluation System, Program Analysis, Problem and Barrier Identification, and Report of Objectives and Action Items.
5.	SUBMISSION OF ANNUAL AFFIRMATIVE EMPLOYMENT PROGRAM REPORTS AND UPDATES	Agency submits annual accomplishment reports and updates which include statistical analysis of work force, and noteworthy activities/initiatives.

PLEASE SEE HARD COPY OR CONTACT OIRM, IMD ON 202-720-8755 FOR THE PAPER COPY OF THE FOLLOWING IMAGE(S):

FIGURE 3 - PLANNING AND REPORTING LEVELS

FIGURE 4 - EQUAL EMPLOYMENT OPPORTUNITY COMMISSION FEDERAL AFFIRMATIVE ACTION REGIONS

FIGURE 5

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

FIELD OFFICE WITH

FEDERAL AFFIRMATIVE ACTION UNITS

NEW ENGLAND REGION
FEDERAL AFFIRMATIVE ACTION UNIT

EEOC

90 CHURCH ST, ROOM 1501
NEW YORK, NY 10007

EASTERN REGION
FEDERAL AFFIRMATIVE ACTION UNIT

EEOC

90 CHURCH ST, ROOM 1501
NEW YORK, NY 10007

MID-ATLANTIC REGION
FEDERAL AFFIRMATIVE ACTION UNIT

EEOC

127 NORTH 4TH ST., 3RD FLOOR
PHILADELPHIA, PA 19106

SOUTHEAST REGION
FEDERAL AFFIRMATIVE ACTION UNIT

EEOC

75 PIEDMONT AVE, NE, RM. 1100
ATLANTA, GA 30335

GREAT LAKES REGION
FEDERAL AFFIRMATIVE ACTION UNIT

MID-CONTINENT REGION
FEDERAL AFFIRMATIVE ACTION UNIT

EEOC

625 NORTH EUCLID ST. 5TH FLOOR
ST. LOUIS, MO 63108

SOUTHWEST REGION
FEDERAL AFFIRMATIVE ACTION UNIT

EEOC

8303 ELMBROOK DRIVE, 2ND FLOOR
DALLAS, TX 75247

ROCKY MOUNTAIN REGION
FEDERAL AFFIRMATIVE ACTION UNIT

EEOC

1845 SHERMAN ST., 2ND FLOOR
DENVER, CO 80203

NORTHWEST REGION
FEDERAL AFFIRMATIVE ACTION UNIT

EEOC

ARCADE PLAZA BUILDING
1321 SECOND AVENUE
SEATTLE, WA 98104

WESTERN REGION
FEDERAL AFFIRMATIVE ACTION UNIT

EEOC

EEOC

536 S. CLARK STREET, ROOM 930-A
CHICAGO, IL 60605

901 MARKET ST., SUITE 500
SAN FRANCISCO, CA 94103

EXHIBIT 1

AFFIRMATIVE EMPLOYMENT PROGRAM FOR MINORITIES AND WOMEN

MULTI-YEAR AFFIRMATIVE EMPLOYMENT PROGRAM PLAN

* POLICY STATEMENT	* STATEMENT OF ADEQUATE
* DELEGATION OF AUTHORITY	MONITORING/EVALUATION SYSTEM
* ORGANIZATIONAL CHART	* PROGRAM ANALYSIS
* CERTIFICATION OF IDENTIFICATION	* PROBLEM/BARRIER
QUALIFICATIONS	
* PLAN FOR THE PREVENTION OF SEXUAL HARASSMENT	* REPORT OF OBJECTIVES AND ACTION ITEMS

NAME OF ORGANIZATION

ADDRESS OF ORGANIZATION

COMMAND _____ INSTALLATION _____ HEADQUARTERS _____

NUMBER OF EMPLOYEES COVERED BY PLAN: TOTAL _____

PROFESSIONAL _____ ADMINISTRATIVE _____

TECHNICAL _____

CLERICAL _____ OTHER _____ BLUE COLLAR _____

NAME OF CONTACT PERSON/PERSON PREPARING FORM TELEPHONE NO.

EXHIBIT 1

AFFIRMATIVE EMPLOYMENT PROGRAM FOR MINORITIES AND WOMEN
D E L E G A T I O N O F A U T H O R I T Y
(EXPLANATION OF RESPONSIBILITIES OF EEO PROGRAM OFFICIALS)

EEOC FORM 566 (8/87)

EXHIBIT 1

AFFIRMATIVE EMPLOYMENT PROGRAM FOR MINORITIES AND WOMEN
O R G A N I Z A T I O N A L C H A R T
INCLUDE A LIST OF COMMANDS, MAJOR OPERATING COMPONENTS, REGIONAL
OFFICES, AND INSTALLATION.

EEOC FORM 566 (8/87)

EXHIBIT 1

AFFIRMATIVE EMPLOYMENT PROGRAM FOR MINORITIES AND WOMEN
CERTIFICATION OF QUALIFICATIONS OF EEO OFFICIALS

=====

I CERTIFY THAT THE QUALIFICATIONS OF ALL STAFF OFFICIALS, FULL-TIME OR PART-TIME, RESPONSIBLE FOR THE ADMINISTRATION OF THE

EQUAL EMPLOYMENT OPPORTUNITY PROGRAM AND AFFIRMATIVE EMPLOYMENT PROGRAM HAVE BEEN REVIEWED BY COMPETENT AUTHORITY AND MEET THE QUALIFICATION STANDARDS IN THE HANDBOOK X-118.

SIGNATURE

DATE

EEOC FORM 566 (8/87)

EXHIBIT 1

AFFIRMATIVE EMPLOYMENT PROGRAM FOR MINORITIES AND WOMEN
PLAN FOR THE PREVENTION OF SEXUAL HARASSMENT

=====

EEOC FORM 566 (8/87)

EXHIBIT 1

AFFIRMATIVE EMPLOYMENT PROGRAM FOR MINORITIES AND WOMEN
STATEMENT OF ADEQUATE MONITORING/EVALUATION SYSTEM

=====

EEOC FORM 566 (8/87)

EXHIBIT 1

AFFIRMATIVE EMPLOYMENT PROGRAM FOR MINORITIES AND WOMEN
PROGRAM ANALYSIS

=====

PROVIDE A NARRATIVE ANALYSIS OF THE AFFIRMATIVE EMPLOYMENT PROGRAM FOR THE FOLLOWING ELEMENTS:

1. ORGANIZATION AND RESOURCES
2. WORK FORCE
3. DISCRIMINATION COMPLAINTS
4. RECRUITMENT AND HIRING
5. EMPLOYEE DEVELOPMENT PROGRAMS
6. PROMOTIONS
7. SEPARATIONS
8. PROGRAM EVALUATION

EEOC FORM 566 (8/87)

EXHIBIT 1

AFFIRMATIVE EMPLOYMENT PROGRAM FOR MINORITIES AND WOMEN
PROBLEM/BARRIER IDENTIFICATION

=====

PROVIDE A NARRATIVE DESCRIBING THE PROBLEMS/BARRIERS IDENTIFIED:

EEOC FORM 566 (8/87)

EXHIBIT 1

AFFIRMATIVE EMPLOYMENT PROGRAM FOR MINORITIES AND WOMEN

REPORT OF OBJECTIVES AND ACTION ITEMS

=====

PROGRAM ELEMENT:

PROBLEM/BARRIER STATEMENT:

OBJECTIVE:

RESPONSIBLE OFFICIAL:

TARGET DATE:

ACTION ITEMS:
DATE

RESPONSIBLE
OFFICIAL

TARGET

EEOC FORM 566 (8/87)

EXHIBIT 2

AFFIRMATIVE EMPLOYMENT PROGRAM FOR MINORITIES AND WOMEN

COMMITMENT TO EQUAL EMPLOYMENT OPPORTUNITY

STATEMENT FOR AGENCIES WITH FEWER THAN 500 EMPLOYEES

POLICY STATEMENT FOR OCTOBER 1, 1987 THROUGH SEPTEMBER 30, 1992

=====

ACT OF 1964, AS AMENDED, WHICH GUARANTEES EQUAL EMPLOYMENT OPPORTUNITY FOR ALL EMPLOYEES AND APPLICANTS FOR EMPLOYMENT WITHOUT REGARD TO RACE, COLOR, RELIGION, SEX, OR NATIONAL ORIGIN. OUR OBJECTIVE IS TO PROVIDE A WORK ENVIRONMENT FREE OF UNLAWFUL EMPLOYMENT DISCRIMINATION.

RESPONSIBLE FOR SUPPORTING OUR POLICY ON EQUAL EMPLOYMENT OPPORTUNITY AND FOR ASSURING THAT THE WORK PLACE IS FREE FROM DISCRIMINATION. ALL PERSONNEL PRACTICES INCLUDING RECRUITMENT, SELECTION, TRAINING, PROMOTION, TRANSFER, AND BENEFITS ARE REQUIRED TO BE FREE OF UNLAWFUL DISCRIMINATION.

SIGNATURE OF AGENCY HEAD OR DESIGNATED OFFICIAL

NAME AND TITLE DATE

EEOC FORM 567 (8/87)

EXHIBIT 3

AFFIRMATIVE EMPLOYMENT PROGRAM FOR MINORITIES AND WOMEN
ANNUAL AFFIRMATIVE EMPLOYMENT PROGRAM ACCOMPLISHMENT REPORT
FOR FISCAL YEAR 19__

=====

==

- * SUMMARY ANALYSIS OF WORK FORCE
- * ACCOMPLISHMENT REPORT ON OBJECTIVES AND ACTION ITEMS
- * NOTEWORTHY ACTIVITIES AND INITIATIVES

=====

==

NAME OF ORGANIZATION

ADDRESS OF ORGANIZATION

COMMAND _____ INSTALLATION _____ HEADQUARTERS _____

NUMBER OF EMPLOYEES COVERED BY PLAN: TOTAL _____

PROFESSIONAL _____ ADMINISTRATIVE _____

TECHNICAL _____

CLERICAL _____ OTHER _____ BLUE COLLAR _____

NAME OF CONTACT PERSON/PERSON PREPARING FORM TELEPHONE NO.

NAME OF TITLE OF PRINCIPAL EEO OFFICIAL

SIGNATURE OF PRINCIPAL EEO OFFICIAL DATE
CERTIFIES THAT THIS PLAN IS IN COMPLIANCE WITH EEO-ME-714.

NAME AND TITLE OF HEAD OF ORGANIZATION OR DESIGNATED OFFICIAL

SIGNATURE OF HEAD OF ORGANIZATION OR DESIGNATED OFFICIAL CERTIFIES THAT
THIS PLAN IS IN COMPLIANCE WITH EEO-ME-714.

EXHIBIT 3

AFFIRMATIVE EMPLOYMENT PROGRAM FOR MINORITIES AND WOMEN
ANNUAL AFFIRMATIVE EMPLOYMENT PROGRAM ACCOMPLISHMENT REPORT
SUMMARY ANALYSIS OF WORK FORCE

PROVIDE A NARRATIVE WORK FORCE ANALYSIS USING THE RELEVANT CIVILIAN
LABOR FORCE. ANALYZE OCCUPATIONAL CATEGORIES, GRADE GROUPINGS, AND
MAJOR OCCUPATIONS.

=====

EEOC FORM 568 (8/87)

EXHIBIT 3

AFFIRMATIVE EMPLOYMENT PROGRAM FOR MINORITIES AND WOMEN
ACCOMPLISHMENT REPORT OF OBJECTIVES AND ACTION ITEMS

=====

PROGRAM ELEMENT:

PROBLEM/BARRIER STATEMENT:

OBJECTIVE:

RESPONSIBLE OFFICIAL:

TARGET DATE:

ACTION ITEMS:
DATE

RESPONSIBLE TARGET
OFFICIAL

ANALYSIS OF CPDF INFORMATION

1. WORK FORCE PROFILES

Annually, EEOC will provide Federal agencies with work force information from the Office of Personnel Management's (OPM) Central Personnel Data File (CPDF) for PATCOB categories and grade groupings. This information should be used in evaluation of the agency work force. All agencies, except the U.S. Postal Service, Tennessee Valley Authority, Federal Reserve Board; and parts of a few other agencies, are covered by the CPDF. Agencies not covered by the CPDF must submit agency generated work force data.

This work force information is critical for evaluation of agency progress and governmentwide trends for the annual report to the Congress and to the President. Use of CPDF information will ensure uniformity of data and facilitate data analysis. Each agency is responsible for ensuring that its work force information is accurate. Agencies should cooperate with the Office of Personnel Management to develop the most accurate data possible.

a. PATCOB Categories by EEO Group

Data on PATCOB categories will be generated from OPM's CPDF and transmitted by EEOC to each agency for verification. See Appendix B for the data format.

b. Grade Groupings by EEO Group for White and Blue Collar Positions

Data on PATCOB categories will be generated from OPM's CPDF and transmitted by EEOC to each agency for verification. See Appendix B for the data format.

c. Statistical Summary Analysis

Agencies should provide EEOC with its own summary analysis of the CPDF data by PATCOB category, and by grade groupings. Agencies must also submit to EEOC a work force analysis by major occupational series. Agencies should analyze work force data and identify employment trends for action and further study. Agencies should use this element to select areas for affirmative employment efforts.

Specific Actions to Achieve Progress. See Appendix C for examples.

1. Agencies should compare its work force for the current year with its work force for the previous year. Agencies should provide EEOC with a summary of its analysis describing changes in its work force.
2. Agencies should compare its work force with the appropriate civilian work force. The agency should provide EEOC with an explanation of both geographic and Civilian Labor Force

percentages used in comparison with the agency's work force.

APPENDIX B

DATA FORMATS FOR CENTRAL PERSONNEL DATA FILE INFORMATION

The following formats will be provided to agencies on an annual basis:

1. FORM 505M - Change in White-Collar EEO Work Force Profile by PATCO Occupational Category,
2. FORM 506L1 - Change in White-Collar EEO Work Force Profile by GS Grade Equivalent Group,
3. FORM 506L2 - Change in Blue-Collar EEO Work Force Profile Part I by WD/WD Grade Groups,
4. FORM 506L2 - Change in Blue-Collar EEO Work Force profile Part II by WL/WN/WS Grade Groups,
5. FORM 506M - Average Grade and Average Salary EEO profile, and
6. FORM 506N - Unspecified Data.

Information in the above forms covers all CPDF records, (Tenure Codes 1 and 2) full-time and part-time permanent employees in the Senior Executive Service, FS and equivalent white-collar pay plans, and all blue-collar pay plans. With the exception of Forms 506M and 506N, all forms compare data at the beginning and ending of the fiscal year. Forms 506M and 506N cover data as of the end of the fiscal year.

APPENDIX C

EXAMPLES - ANALYSIS OF WORK FORCE DATA

This Appendix provides examples of how an agency could analyze work force data and identify employment trends for action and additional study.

EXAMPLE 1.

Review of Form 505M:

Identify occupational categories and groups where EEO groups decrease or increase. By focusing attention on areas where decreases occurred and an EEO group is not fully represented, the agency might be able to identify recruitment strategies for increasing the number of an EEO group in the agency work force.

Conversely, by studying areas where an EEO group is making progress to reduce the difference between its representation in the agency work force in comparison to the CLF, the agency might uncover successful recruitment strategies which could be adapted to other areas where little or no progress is occurring. The agency could also highlight increases in its report on significant accomplishments.

EXAMPLE 2.

Review of Form 506L1:

Identify grade groupings and EEO groups where EEO groups are concentrated or lacking. This would assist an agency in identifying strategies for upward mobility, training, and advancement of minorities and women.

EXAMPLE 3.

Analysis of Form 505M:

1. For agency, copy percentages for each occupational category and EEO group's 1986 data from Form 505M to Agency Row on Comparison Form.
2. Enter the corresponding Civilian Labor Force percentages for each EEO group into the Civilian Labor Force ROW.
3. Compare the percentages for each EEO group and occupational category as follows:
 - a. If the percentages for each occupational category and EEO group on the top row (Agency Row) is greater than the corresponding percentage on the bottom row (Civilian Work Force), the agency may not need to initiate actions for this EEO group.
 - b. If the percentages for each occupational category and EEO group on the top for (Agency Row) is less than the corresponding percentage on the bottom row (Civilian Work Force), the agency may need to initiate actions for recruitment and barrier analysis for this EEO group and occupational category.

PLEASE SEE HARD COPY OR CONTACT OIRM, IMD ON
202-720-8755 FOR THE PAPER COPY OF THE FOLLOWING
IMAGE(S) :

Appendix C - Distribution of EEO Groups and
Comparison by PATCOB - EEOC Form 569
(8/87) - MD-714

Appendix C - Distribution of EEO Groups and
Comparison for Major Occupations -
EEOC FORM 570 (8/87) - MD-714

APPENDIX D

EXAMPLES OF PROBLEM AND BARRIER ANALYSIS/IDENTIFICATION

In some cases, problems and barriers are interpreted to be the same. However, for the AEP plan, problems are defined as the situations or conditions which need to be corrected or changed. Barriers are defined as the personnel or management policies, practices, or procedures that cause the situations or conditions.

A management team, consisting of key management officials, EEO staff, personnel staff, and heads of other pertinent offices should meet to review and identify the agency policies, practices and procedures (barriers) that cause manifest imbalance (undesired conditions or problems) in the employment of various EEO groups.

Agencies should use the following process to identify and remove systemic barriers:

- a. State the undesired condition that exists.
- b. State the desired condition or results to be achieved.
- c. Analyze the data to determine what policy, procedure, practice or person might be the cause of the existing undesirable results.
- d. Identify the probable barrier.
- e. State that alternative policy, procedure or practice that will be instituted to bring about the desired conditions or results.
- f. State the results expected from the change in policy, procedure, or practice.
- g. Follow-up action. Track progress to determine if:
 - (1) Barrier correctly identified; the desired change or

condition realized.

(2) Barrier incorrectly identified; the undesired conditions remain unchanged; Re-analyze by repeating steps a through g.

1. a. UNDESIRE CONDITION: Of the over two hundred doctors in a Medical Center, there are no Black, Hispanic, or Women doctors on staff.
 - b. DESIRED CONDITION: Ensure that the opportunity for employment in the Medical Center be open to all applicants, including Black, Hispanic and Women doctors.
 - c. ANALYSIS: Management analysis revealed that all the Medical Center's doctors are members of the medical faculty of the local University's School of Medicine. Further investigation by the EEO Advisory Committee revealed that top management has an unwritten/unannounced policy of screening out applicants who are not members of the Medical School faculty, but who would otherwise qualify to perform as doctors in the Medical Center.
 - d. PROBABLE BARRIER: The unwritten, unspoken policy of requiring doctor applicants to be members of the local Medical School faculty to qualify.
 - e. ALTERNATIVE: Advise top management that the unwritten policy of requiring the applicant to be a member of the local Medical School faculty, while it lends prestige to the medical staff of the Medical Center, is not a valid qualification requirement, but has the effect of screening out disproportionately more minorities and women doctors who would otherwise qualify to be doctors in the Medical Center and therefore should be discontinued; or

Discontinue the unwritten policy of requiring doctor applicants to be members of the local Medical School faculty to qualify.
 - f. EXPECTED RESULT: Result of the changed policy is that minority and women doctor applicants who are not members of the local Medical School faculty will be considered and selected for medical doctor positions in the Medical Center.
 - g. FOLLOW-UP ACTION: Following the change in the policy, data of subsequent recruitment actions show that minority and women doctor applicants not on the University Medical faculty were considered and selected. Barrier was correctly identified.
2. An analysis of an organization's personnel action history shows that over a period of years, some managers and supervisors may have had the practice of hiring another minority/female to fill low graded jobs that were previously successfully occupied by other persons of that same minority/female group. A history of such actions may imply an attitude on the part of these supervisors and managers of stereotyping the abilities or capabilities of certain

groups of minorities or women, which would have the result of excluding them from consideration for other more responsible, higher paying positions.

- a. UNDESIRE CONDITION: The practice of not opening all job opportunities to the affected minority or women groups.
 - b. DESIRE CONDITION: Ensure that all employment in all jobs are available to all minorities and women who meet the qualification requirements.
 - c. ANALYSIS: Follow up tracking data of the highly qualified applicants indicated that minorities and women applying for the more responsible positions in the organization experienced exceedingly low selection rates, while the same groups' selection rate for the positions traditionally occupied by members of these groups remained exceedingly high.
 - d. PROBABLE BARRIER: The policy or practice of not giving equal consideration for employment in certain positions to certain minorities and women.
 - e. ALTERNATIVE: Bring the results of such practices to the attention of top management, and the managers and supervisors involved, and urge them to commit themselves to giving equal consideration for employment to all minorities and women in all the positions in the organization.
 - f. EXPECTED RESULT: Selection results of subsequent announcements of higher graded positions should show higher selection rates of members of these groups.
 - g. FOLLOW-UP ACTION: Track the applicant flow data, and report the relative selection rates to management. Results should show a better selection rate for the affected groups in the employment area which previously showed low participation.
3. a. UNDESIRE CONDITION: The practice of requiring education levels above those imposed by the qualification standards issued by the Office of Personnel Management.
 - b. DESIRE CONDITION: Have positive staffing requirement only where mandated by the appropriate qualification standard.
 - c. ANALYSIS: A review of several staffing actions revealed that for some Administrative positions, a college degree was required, even though the qualification standard issued by the Office of Personnel Management did not require such a degree.
 - d. PROBABLE BARRIER: The practice of requiring a college degree where not necessary.
 - e. ALTERNATIVE: Require a college degree only for those positions where the Office of Personnel Management has found it to be necessary.

- f. EXPECTED RESULT: Selection rates for underrepresented group members should increase as a result of the appropriate qualification requirements.
 - g. FOLLOW-UP ACTION: Track the data on selection rates and report the results to management team.
- 4.
- a. UNDESIRE D CONDITION: Statistics indicate that minorities are repeatedly inadequately represented in the applicant flow data.
 - b. DESIRE D CONDITION: Minorities are adequately represented on the certificates of job announcements, especially those jobs where minority goals have been set.
 - c. ANALYSIS: Shows that management, personnel, and the EEO staff are not reacting to the poor recruitment results, and have not adopted other recruitment efforts which have proven to be successful with other better represented groups.
 - d. PROBABLE BARRIER: Management and personnel policy continue recruitment practices that are adversely impacting on specific minority groups.
 - e. ALTERNATIVE: Inform management of the poor recruitment results, and urge the adoption of a new policy of pursuing more successful recruitment methods and practices.
 - f. FOLLOW-UP ACTION: Gather data, track and evaluate the results of the new recruitment efforts for effectiveness and desired results. Continue pursuing different approaches such as finding new sources where there is a larger representation of minorities.
- 5.
- a. UNDESIRE D CONDITION: Women represent only .5 percent of agency's 300 Auditors.
 - b. DESIRE D CONDITION: Ensure that Auditor positions are open to all qualified applicants.
 - c. ANALYSIS: Analysis of applicant flow data for the past three years reveals that women apply for auditor positions at a higher rate than their representation in the CLF. Women also represent 30 percent of applicants certified for positions. However, the selection rate for females is considerably lower than that of other EEO groups.

Further inquiry by way of interviews with selecting officials reveal that the position of auditor requires about 30 to 50 percent travel time, and that selecting officials believe, based on interview questions, that women would not be available for heavy travel schedules (because of child care and other family responsibilities.)
 - d. PROBABLE BARRIERS: Selecting officials stereotyped all females in a traditional female role of being primarily

responsible for child care and running a household.

- e. ALTERNATIVE: Advise selecting official that (1) their attitudes toward women have a demonstrably adverse impact on female applicants for Auditor positions; (2) no questions should be asked during the interview which do not directly relate to the applicant's ability to perform the job, and no questions should be asked of female applicants that are not asked of male applicants; and (3) all applicants should receive equal consideration based on their qualifications, and, based on their willingness of travel.
- f. EXPECTED RESULTS: Applicants are given equal consideration, which should result in an increase in representation of female auditors.
- g. FOLLOW-UP ACTION: Following the change in practice, the representation of female auditors increased significantly during the first fiscal year. There is every indication that progress will continue for female auditors in agency's work force. Barrier has been properly identified.

APPENDIX E

Legal Authorities

Section 717 of Title VII. In the 1972 amendments of Title VII of the Civil Rights Act (Section 717, 42 USC 2000e-16), the Congress required agencies to maintain affirmative employment programs to ensure enforcement of Federal equal employment opportunity policy; to apply the same legal standards to prohibited discrimination established for private employers to the Federal Government; and to eliminate discrimination that Congress found existing throughout the Federal employment system.

In enacting these requirements, Congress cited the need to eliminate discrimination in Federal employment. This discrimination was evidenced (1) by serious underrepresentation and exclusion of minorities and women in specific areas, agencies, regions, and grade levels; and (2) by systemic institutional barriers operating through various civil service rules and procedures, particularly non-job related selection and promotion techniques.

Section 717(b) reads as follows:

"... The (EEOC) shall -- (1) be responsible for the annual review and approval of a national and regional equal employment opportunity plan which each department and agency and each appropriate unit .

.
. shall submit in order to maintain an

affirmative program of equal employment opportunity for all such employees and applicants for employment; .

.
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"

Executive Order 11478. Requirements for Federal agency affirmative employment programs were first established by Executive Order 11478 in 1969.

The Executive Order as amended by Executive Order 12106 reads as follows:

"It is the policy of the Government of the United States to provide equal opportunity in Federal employment for all persons, to prohibit discrimination in employment because of race, color, religion, sex, or national origin, and to promote the full realization of equal employment opportunity through a continuing program in each executive department and agency. This policy of equal opportunity applies to and must be an integral part of every aspect of personnel policy and practice in the employment, development, advancement, and treatment of civilian employees of the Federal Government .

.
.

The head of each executive department and agency shall establish and maintain an affirmative program of equal employment opportunity for all civilian employees and applicants for employment within his jurisdiction.

.
.
"

Reorganization Plan No. 1 of 1978. This Presidential directive transferred all Federal equal employment enforcement responsibilities vested in the Civil Service Commission to the EEOC.

Executive Order 12067. This Presidential directive gave EEOC lead coordinating responsibility for all Federal equal employment opportunity programs and activities. Pursuant to this authority, EEOC consults regularly with Federal agencies on Federal equal employment opportunity policy.

Civil Service Reform Act. this legislation directed EEOC to develop guidelines for a special recruitment program, designated the Federal Equal Opportunity Recruitment Program (FEORP). The statutory authority for program oversight was given to OPM (5 USC 7201) and required that agencies conduct affirmative recruitment for those occupations and grades within their work force in which there is underrepresentation of minorities and women. Agency FEORP plans should result in more representative applicant pools from which to select Federal employees.

Section 501 of the Rehabilitation Act of 1973, as amended (29 U.S.C 791). This legislation established within the Federal Government, an Inter-agency Committee on Handicapped Employees comprised of such members as the President may select, or their designees, whose positions are Executive Level IV or higher.

APPENDIX B

MOCs REQUIRED TO SUBMIT MULTI-YEAR AEP PLANS, ANNUAL AEP

ACCOMPLISHMENT REPORTS, AND ANNUAL AEP PLAN UPDATES:

Agricultural Marketing Service *
Animal and Plant Health Inspection Service *
Agricultural Research Service *
Agricultural Stabilization and Conservation Service *
Cooperative State Research Service
Economics Management Staff
Economics Research Service
Extension Service *
Foreign Agricultural Service
Farmers Home Administration *
Federal Crop Insurance Corporation
Federal Grain Inspection Service
Food and Nutrition Service *
Forest Service *
Food Safety and Inspection Service *
Human Nutrition Information Service
National Agricultural Library
National Agricultural Statistics Service
National Finance Center
Office of Advocacy and Enterprise
Office of Budget and Program Analysis
Office of Finance and Management
Office of the General Counsel
Office of International Cooperation and Development
Office of the Inspector General
Office of Information Resources Management
Office of Operations
Office of Personnel
Office of Public Affairs
Packers and Stockyards Administration
Rural Electrification Administration
Soil Conservation Service *

* Required to submit both MOC and headquarters plans and reports.

APPENDIX C

U.S. DEPARTMENT OF AGRICULTURE

PROGRAM ANALYSIS GUIDELINES

This manual requires that each reporting level conduct a comprehensive program analysis of the current status of its affirmative employment efforts. Reporting levels must use all of the eight program elements to conduct their analyses.

Each reporting level must respond to a series of questions listed below under each program element to complete the analysis. "Yes" or "no" responses to the questions will not result in a comprehensive analysis; therefore, submission must include an analysis of each program element in narrative form.

The following guidelines are provided to assist in conducting the required comprehensive program analysis.

Organization and Resources

- a Does the Equal Employment Opportunity (EEO) officer have direct access to top management and lines of communication to supervisors?
 - 1 Review organizational chart for lines of authority.
 - 2 Determine the number of "layers" of management between the EEO officer and the reporting level head (Administrator, Chief, etc.) and indicate if it facilitates or impedes the accomplishment of specific EEO goals.
 - 3 Indicate if the EEO officer attends staff meeting,s planning sessions, etc., along with other management officials.
 - 4 Determine the extent to which the EEO officer meets with the reporting level head.

- b Do EEO program officials receive adequate training in EEO, personnel, administration, and management to effectively resolve problems and issues within their areas of responsibility?
 - 1 Define "adequate training."
 - 2 Review the training record of all EEO program officials during the most recent two years. Identify the training received and the areas in which specific training is needed.

- c Are there adequate management and fiscal controls to monitor all resources allocated to the EEO program?
 - 1 Identify the specific controls currently utilized and describe how the monitoring process works.
 - 2 Determine if the EEO officer maintains records which document EEO program activities and accomplishments.

- d Do special emphasis program managers (SEPMs) devote sufficient time to accomplish program objectives? Do these managers have adequate

delegations of authority to promote programs and to accomplish program objectives?

- 1 Compare the time allocated to each SEP with the time the program manager actually devotes to the program.
- 2 Based on the above comparison, determine the amount of time necessary to implement the SEPs. Refer to FPM Letter 713.37 for guidance on EEO collateral duty assignments.
- 3 Describe the delegations of authority issued to each SEPM.

e Are EEO officials providing technical advice to management officials and the personnel office?

- 1 If so, indicate:
 - (a) How and when it is given.
 - (b) To whom it is given.
 - (c) The impact of the technical advice on the program and development of plans and reports.
- 2 If not, state reason(s).

f Have supervisors and managers received training which includes coverage of their EEO responsibilities?

- 1 Identify the training each supervisor and manager has received during the past two years and indicate the following:
 - (a) Name of the course;
 - (b) Dates of attendance;
 - (c) Name of the provider; and
 - (d) Whether the training was mandatory or optional.

g If the incentive awards system used to recognize supervisors and managers for their understanding and support of EEO and their accomplishments in the EEO area?

- 1 Determine the number of supervisors and managers who received EEO awards during the past two years. Cite the specific EEO accomplishment(s) of each award recipient.
- 2 Describe methods used to encourage supervisors and managers to excel in the area of EEO.

h Do performance evaluations of supervisors and managers include specific factors for evaluating EEO performance?

- 1 Review performance standards for an EEO element.
- 2 Identify the criteria used to evaluate performance in EEO and

determine whether they are objective and realistic.

Work Force

- a Has an analysis of the work force been conducted by PATCOB category, grade groupings, grade levels, and major occupational series?
 - 1 Identify manifest imbalance or conspicuous absence (MICA) by Professional, Administrative, Technical, Clerical and Other White Collar occupational categories and the Blue Collar occupational category (PATCOB), grade groupings, and major occupational series.
 - 2 Identify the individual grade levels within each grade grouping where MICA exists.
 - 3 Identify specific strategies to eliminate MICA.
 - 4 Compare the current work force with that of the previous year, and indicate significant changes in the status of EEO groups. If possible, cite the reasons for the changes.
 - 5 Compare the current work force with the appropriate CLF and state what the comparison reveals about the work force.

Discrimination Complaints

- a Does an analysis of the bases, issues, and findings of recent complaints suggest the need to explore possible problem areas?
 - 1 Identify the time period the complaint analysis covers.
 - 2 Indicate the number of complaints included in the analysis.
 - 3 Indicate the number of complaints filed during this period.
 - 4 Show the most frequently cited bases and issues.
 - 5 Indicate if the decisions are most often favorable or unfavorable to the agency.
 - 6 Identify the problem areas suggested by the analysis.
 - 7 Identify actions planned or taken to eliminate the problem areas.
 - 8 Identify the official responsible for implementing, evaluating, and monitoring actions to eliminate the problem areas.
 - 9 Describe systems established to provide periodic status reports to management officials. Show how these systems are utilized.

Recruitment and Hiring

- a Do present recruitment sources yield qualified minority and female applicants who meet organizational needs?
- 1 Identify the minority and female recruitment sources currently being used.
 - 2 Indicate the frequency of recruitment activities by type of activity.
 - 3 Identify the designated recruitment official(s).
 - 4 Indicate the number of selections made for all positions utilizing current recruitment strategies by race, sex, and national origin (RSNO), series, and grade. Indicate the number of minority and female applicants available for selection by RSNO.
 - 5 Identify the fiscal resources for recruitment activities and determine if they are sufficient to implement plans.
- b Have qualification requirements and procedures for hiring been examined to determine whether barriers to EEO exist?
- 1 If so, indicate:
 - (a) When they were examined and by whom.
 - (b) The process used to identify barriers.
 - (c) The specific barriers identified.
 - (d) The actions selected to eliminate each barrier.
 - 2 If not, state reason(s).
- c Does the recruitment literature reflect a commitment to reach all segments of the potential work force?
- 1 Identify minority, female, and community organizations which receive recruitment literature.
 - 2 Describe actions taken to reach all segments of the potential work force.
 - 3 Indicate if recruitment literature contains pictures of minorities and women in non-traditional occupational settings.
- d Do EEO officials participate in the development of vacancy projections?
- 1 If so, describe:
 - (a) How they participate.
 - (b) How their involvement affects the process.
 - 2 If not, state reason(s).

- e Are recruitment efforts within the MOC coordinated to ensure maximum effectiveness where appropriate?
- 1 If so, indicate:
 - (a) How they are coordinated.
 - (b) The official(s) responsible for coordinating recruitment efforts.
 - (c) How coordinated recruitment efforts affect the recruitment program.
 - 2 If not, state reason(s).
- f Do EEO officials provide technical assistance to the personnel office and monitor, as well as participate in, recruitment efforts?
- 1 If so, indicate:
 - (a) Who the EEO officials are who provide technical assistance and advice to the personnel office.
 - (b) How the personnel office accommodates the technical assistance and advice with MOC personnel policies, practices, and procedures.
 - (c) The extent to which EEO officials participate in recruitment efforts.
 - (d) If the monitoring system is effective.
 - 2 If not, state reason(s).
- g Is the selection process reviewed periodically to ensure equal treatment regardless of race, color, religion, sex, national origin, age, or employee disability?
- 1 If so, indicate:
 - (a) Which official is responsible for conducting periodic reviews.
 - (b) The frequency of the reviews.
 - (c) The deficiencies identified in the selection process and specific actions selected to eliminate them.
 - 2 If not, indicate plans to do so.
- h When paid advertising is used for recruitment or institutional purposes, are minority media included?
- 1 Identify advertising sources used and indicate which are minority media.

- 2 Indicate the frequency with which minority media are used.
- i Does management interact with the community, civic, and other groups interested in enhancing equal employment opportunity?
 - 1 If so, indicate:
 - (a) How management interacts with these groups.
 - (b) Which community, civic, and other groups are involved.
 - (c) What impact, if any, has this interaction on the size of the applicant pool and representation of minorities and women in the work force.
 - 2 If not, state reason(s).
- j Does the reporting level participate in cooperative efforts with Federal and other organizations to resolve employment related problems in the community; e.g., need for improved public transportation, education, and child day care?
 - 1 Identify the specific organizations and strategies used to resolve employment related problems.
 - 2 Describe the results of each cooperative effort.
 - 3 Indicate whether or not such cooperative efforts are continuous.
 - 4 Identify the official(s) with major responsibility for these efforts.
 - 5 Describe the fiscal resources available for these efforts.
- k Does the reporting level provide opportunities and services to the community such as cooperative education programs and use of training facilities?
 - 1 Indicate the specific opportunities and services provided to the community.
 - 2 Describe to results of these activities.
 - 3 Indicate if this initiative is continuous.
 - 4 Identify official(s) with major responsibility for these activities.
 - 5 Describe how this activity has affected the size of applicant pool and the representation of minorities and women in the work force.
- l Does the reporting level participate in community career information programs, conferences, and occupational study projects?
 - 1 Identify specific programs, conferences, and occupational

study projects.

- 2 Indicate the frequency of participation in these activities by type.
- 3 Identify the official(s) who participate in these activities by type.

m Has the reporting level examined methods for expanding worker-trainee placement? Do current plans call for maximum participation in the Worker-Trainee Opportunities program, or other such programs, with particular emphasis on the identification of developmental positions?

- 1 Describe the examining process.
- 2 Describe methods to expand worker-trainee placement and indicate if these methods are implemented.
- 3 Indicate the number of employees currently participating in the Worker-Trainee Opportunities program or other such programs by RSNO, series and grade.
- 4 Indicate methods used to identify developmental positions.
- 5 Indicate the number of developmental positions identified and the current participants by RSNO, series, and grade.

Employee Development Programs

a Are systems for tracking information on employee skills and training in operation?

- 1 Describe the extent to which the Training Information System (TRAI) is used to track and analyze training.
- 2 If TRAI is not utilized, identify the system(s) currently in use.
- 3 Identify deficiencies, if any, in the current system(s). Indicate if they are updated as a result of periodic assessments.

b Has a survey of current skills and training of work force been conducted to determine the availability of employees with skills required to meet staffing needs? If so,

- 1 Identify the date of the survey.
- 2 Identify the responsible official(s).
- 3 Describe the survey findings and the number of employees affected by RSNO.
- 4 Describe specific plans to utilize these employees to meet staffing needs.

- 5 If a survey has not been conducted, indicate plans to do so.
- c Has the reporting level conducted time-in-grade studies to determine the reasons for any differentials which may exist by minority status and sex?
- 1 If so, indicate:
- (a) When the studies were conducted.
 - (b) Who is responsible.
 - (c) The findings of each study.
 - (d) The specific actions taken as a result of the studies.
- 2 If not, indicate plans to do so.
- d Has the reporting level conducted studies to examine upward movement of employees to full performance, professional, supervisory, and highest grade level?
- 1 If so, indicate:
- (a) When the studies were conducted.
 - (b) Who is responsible.
 - (c) The findings of each study.
 - (d) The specific actions taken as a result of the studies.
- 2 If not, indicate plans to do so.
- e Is career counseling available to all employees?
- 1 Identify the responsible official(s).
- 2 Determine the adequacy of the career counseling program.
- f Are efforts made to ensure that appropriate training opportunities are available to employees at all grade levels and in all occupational areas, without regard to RSNO?
- 1 If so, indicate:
- (a) Who is responsible.
 - (b) The specific efforts to ensure training opportunities.
 - (c) The impact of these efforts on training received by RSNO.
- 2 If not, state reason(s).
- g Is the MOC encouraging the use of programs that emphasize outside educational efforts? If so, list substantive results.

Promotions

- a Are internal selection and promotion qualification requirements and procedures valid, job-related, and free from unnecessary barriers to the full utilization of skills and training?
 - 1 Determine the number of promotions by RSNO.
 - 2 Compare the number of promotions by RSNO with the number of qualified candidates by RSNO.
 - 3 Determine if disparities regarding internal selection and promotion qualification requirements and procedures exist.
 - 4 Indicate whether or not the personnel office has analyzed the bases for any real or perceived inequities with regard to internal selection procedures.
 - 5 Describe the results of this analysis.
- b Are efforts made to ensure that appropriate promotional opportunities are available to employees at all grade levels and in all occupational areas, regardless of minority status and sex?
 - 1 If so, indicate:
 - (a) The specific efforts to ensure promotional opportunities.
 - (b) The impact of these efforts on the number of promotions given to minorities and women.
 - (c) The responsible official(s).
 - 2 If not, state reason(s).

Separations

- a Are efforts made to ensure that separations (voluntary and involuntary) are conducted fairly and in a nondiscriminatory manner?
 - 1 If so, indicate:
 - (a) The specific efforts to ensure fair and nondiscriminatory separations.
 - (b) The impact of these efforts on separations.
 - (c) The responsible official(s).
 - 2 If not, state reason(s)
- b Are Reductions-in-Force (RIF) conducted fairly and in a nondiscriminatory manner?
 - 1 Indicate the number of reductions-in-force conducted within

the last two years.

- 2 Indicate the number of employees displaced as a result of each RIF by RSNO.
- 3 Indicate by RSNO the number of discrimination complaints, if any, filed by displaced employees.
- 4 Indicate whether the decisions rendered are most often favorable or unfavorable to the reporting level.
- 5 Describe actions taken by management prior to and during the RIF to minimize its effect on minorities and women.

Program Evaluation

- a Are findings from EEOC on-site reviews and internal program evaluations incorporated into the annual AEP plan development process, if appropriate?
 - 1 Indicate the number of EEOC on-site reviews and internal program evaluations conducted in the last two years.
 - 2 Describe the major findings of EEOC and internal review.
 - 3 Describe the specific EEOC and internal review recommendations.
 - 4 Indicate how the findings have been or will be incorporated into the annual AEP plan development process.
- b Do EEO committee, where established, consult with the EEO officer, personnel officer, and management officials to ensure that each provides input to EEO program evaluation?
- c Are statistical data for EEO program evaluations accurate, timely, and accessible?
- d Are officials responsible for EEO program evaluations fully trained in EEO and merit system requirements contained in EEOC and OPM manuals.
- e Do EEO program evaluations include input from SEPMS and EEO committees?

