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United States Department of the Interior

BUREAU OF RECLAMATION
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Denver, Colorado 80225-0007



February 22, 2008

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ADM-1.1

MEMORANDUM

To: Bureau of Reclamation Managers and Supervisors

From: Christina Hassan
Manager, Civil Rights Office

Subject: Management Directive 715 Brochure

On October 1, 2003, the Equal Employment Opportunity Commission (EEOC) issued new policy guidelines and standards for establishing and maintaining effective affirmative employment programs. This Management Directive 715 (MD-715) is part of the Federal Equal Employment Opportunity (EEO) reform designed to better address organizational shifts and evolving trends in the Federal workplace.

The MD-715 calls for the identification and elimination of barriers that prevent equal employment opportunities in the workplace. Additionally, the MD-715 requires Federal agencies to work towards meeting the six essential elements of a model EEO program: commitment from agency leadership; integration of EEO into the agency's strategic mission; management and program accountability; prevention of unlawful discrimination; efficiency and responsiveness; and legal compliance.

The attached brochure highlights each of these six elements, and outlines the Bureau of Reclamation's (Reclamation) objectives and strategies for achieving a model EEO program. I encourage you to use this brochure to refine your knowledge of MD-715 principles to better understand how critical your role is in achieving our "model employer" status.

Beginning in Fiscal Year 2009, Reclamation will utilize a corporate team to develop the MD-715 submission. The Regions and the Denver/Washington Directorates will appoint supervisors and managers to lead the development and implementation of the Reclamation-wide MD-715. This will ensure that all appropriate levels of the organization are engaged in the process of establishing and implementing an employment program.

If you have any questions, please contact your local EEO or Human Resources office.

Attachment

cc: EEO Managers
HR Managers

RECLAMATION

Managing Water in the West

Management Directive 715

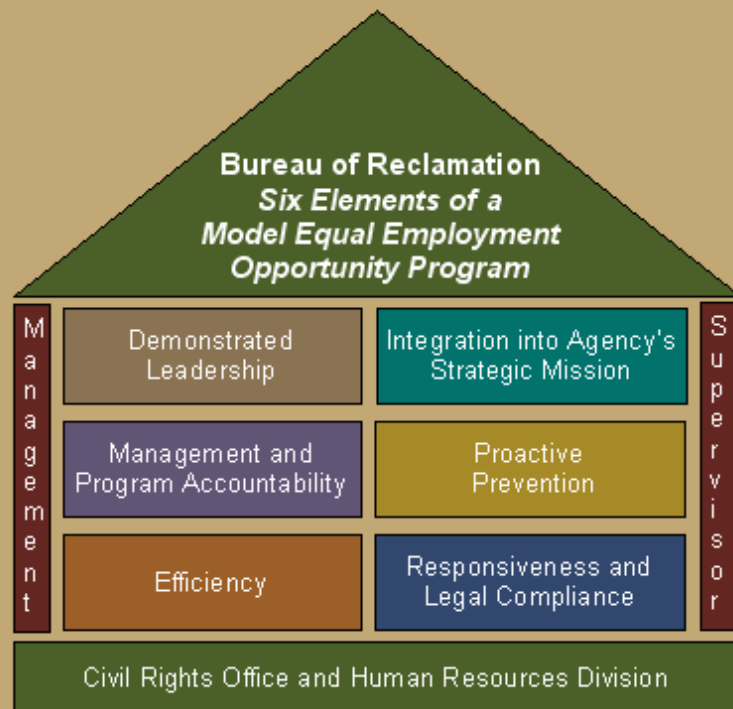
Elements of a Model EEO Program



U.S. Department of the Interior
Bureau of Reclamation

Introduction

The Equal Employment Opportunity Commission (EEOC) released Management Directive 715 (MD-715) October 1, 2003. MD-715 is a management tool to ensure that policies, practices and procedures are conducted in a discrimination free manner. This Directive provides policy guidance and standards for establishing and maintaining model equal employment opportunity programs under Section 717 of Title VII of the Civil Rights Act and Section 501 of the Rehabilitation Act. The overriding objective of this Directive is to ensure that all employees and applicants enjoy equal opportunity in the federal workplace regardless of race, sex, national origin, color, religion, disability, or reprisal for engaging in prior protected activity. It also establishes six essential elements of a model Equal Employment Opportunity Program.



A Message from the Commissioner...

October 2007

It is my vision that Reclamation develops and implements the essential elements of a model EEO program, as defined by the Equal Employment Opportunity Commission Management Directive 715 (MD-715). The MD-715 program is designed to identify and eliminate barriers in all aspects of employment, including management policies, procedures, and practices. We must fully utilize all employees' talents without regard to race, color, gender, religion, national origin, disability, or reprisal for engaging in prior protected activity. This includes promoting an atmosphere where employment opportunities are open to all candidates.

The Reclamation EEO Program and the contents of this booklet are aimed at incorporating the principles of equal opportunity into our organizational structure and institutionalizing the elements as standard business practice.

Equality of opportunity is essential to attracting, developing, and retaining the most skilled workforce to support achievement of our strategic mission. Implementing this equality of opportunity will enable Reclamation to get to "green" in the Human Capital Scorecard on EEO/Diversity. EEO is an integral part of our goal and cannot be achieved without holding personnel at all levels accountable, as well as ensuring that all barriers to equal opportunity are removed. Only then will we be assured that the talents represented by a diverse workforce are fully utilized.

Robert W. Johnson

Essential Element A: Demonstrated Commitment from Agency Leadership

Requires the Agency Head to issue written policy statements ensuring a workplace free of discriminatory harassment and a commitment to equal employment opportunity.

Compliance Indicators

- EEO policy statements are up-to-date.
- EEO policy statements have been communicated to all employees.
- EEO policy is vigorously enforced by agency management.

Outcomes

- Reclamation must translate equal opportunity into everyday practice and make those principles a part of the Agency's culture.
- Conduct State-of-the-Agency briefings to inform leadership on the progress made in achieving a model EEO program.

Strategies

- Equal Employment Opportunity must be:
 - embraced by agency leadership; and
 - communicated through the ranks from the top down.
- Reclamation will issue an annual EEO policy statement.

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

Requires the Agency's EEO programs be organized and structured to maintain a workplace that is free from discrimination in any of the Agency's policies, procedures or practices, and supports the Agency's strategic mission.

Compliance Indicators

- The reporting structure for the EEO Program provides the EEO Director with appropriate authority and resources to effectively carry out a model EEO Program.
- The EEO Director and other EEO professionals have regular and effective means of informing the Commissioner and Reclamation leadership on the status of EEO Programs.
- EEO Officials are involved with and consulted on management and personnel actions.
- Reclamation has committed sufficient human resources and budget allocations to its EEO programs to ensure successful operation.

Outcomes

- Reclamation leadership and employees are involved in the implementation of the MD-715 Program.
- EEO Program has sufficient human and fiscal resources.
- Continue collaboration and responsibility for MD-715 between EEO and Human Resources leadership.

Strategies

- EEO Director has regular access to the Commissioner and Reclamation leadership.
- EEO professionals are involved in all major human resources decisions.
- EEO Director should participate in senior staff meetings and in strategic planning initiatives.
- Allocate sufficient resources to create and maintain a model EEO program.

Essential Element C: Management and Program Accountability

Requires the Agency Head to hold all managers, supervisors, and EEO Officials responsible for the effective implementation of the Agency's EEO Program and Plan.

Compliance Indicators

- EEO Program Officials advise and provide appropriate assistance to Reclamation leadership about the status of EEO Programs within each manager or supervisor's area of responsibility.
- Reclamation Human Resources Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures are in conformity with instructions contained in EEOC management directives. [See 29 CFR § 1614.102(b)(3).]
- When findings of discrimination are made, Reclamation explores whether disciplinary actions should be taken.

Outcomes

- Reclamation personnel policies, selection and promotion procedures, evaluation procedures, rules of conduct, and training systems are fairly implemented.
- Reclamation is getting to "Yes" on the Annual Self-Assessment, indicating barriers are being eliminated.
- Reclamation achieves the "Green" rating on Human Capital Scorecard on EEO/Diversity.

Strategies

- Conduct regular internal audits (at least annually).
- Establish procedures to prevent all forms of discrimination.
- Evaluate managers and supervisors on efforts to ensure equality of employment opportunity.
- Implement effective reasonable accommodation procedures.
- Ensure effective coordination between Reclamation's EEO Program and related human resources programs.
- Review findings of discrimination, take disciplinary action, and track and report trends.
- Ensure compliance with settlement agreements.
- Maintain Reclamation's MD-715 Workgroup.

Essential Element D: Proactive Prevention

Requires that the Agency Head makes early efforts to prevent discriminatory actions and eliminate barriers to equal employment opportunity in the workplace.

Compliance Indicators

- An analysis to identify and remove unnecessary barriers to employment is conducted throughout the year.
- The use of Alternative Dispute Resolution (ADR) is encouraged by senior management.

Outcomes

- Reclamation achieves percentage improvements in the retention of women, minorities, and persons with disabilities.
- No findings of discrimination based on any affected groups.
- Quantitative and qualitative analyses of employee data are conducted that demonstrate improvements in trends, survey results, compliance activities, and other measures.
- Reclamation maintains mandatory training requirements for managers, supervisors, and employees.
- Promote and assess the use of ADR at the informal and formal stages.

Strategies

- Train managers, supervisors, and employees annually regarding diversity, EEO, accessibility, and reasonable accommodation.
- Conduct an annual assessment to identify, investigate, eliminate, and monitor barriers where they may exist in the following areas:
 - Recruitment
 - Hiring and Placement
 - Employee Development and Training Opportunities
 - Award Distribution
 - Discipline
 - Separations
 - Promotions and other internal selections
- Develop a strategic plan to eliminate identifiable barriers.

Essential Element E: Efficiency

Requires that the Agency Head ensures that effective systems are in place for evaluating the impact and effectiveness of the agency's EEO Programs and dispute resolution process.

Compliance Indicators

- Reclamation has sufficient staffing, funding, and authority to achieve the elimination of identified barriers.
- Reclamation has an effective complaint tracking and monitoring system in place to increase the effectiveness of its EEO Program.
- Reclamation has sufficient staffing, funding, and authority to comply with the time frames in accordance with the EEOC (29 CFR Part 1614) regulations for processing EEO complaints of employment discrimination.
- Reclamation has an efficient and fair dispute resolution process.
- Reclamation has effective systems for evaluating the impact and effectiveness of its EEO program including the complaint process.
- Reclamation ensures that the investigation and adjudication function of its complaint resolution process are separate from its legal defense arm of agency or other offices with conflicting or competing interests.

Outcomes

- Sustain an efficient, fair, and impartial complaint resolution process.

Strategies

- Maintain investigation and adjudication functions separately from the legal defense arm of the agency.
- Fund and support effective data collection systems on workforce, applicant flow, and complaint tracking.
- Encourage the widespread use of ADR.
- Utilize quantitative and qualitative data from various systems to:
 - focus training efforts to improve the timeliness of complaint processing and resolution;
 - track trends in employee expressions of fair and respectful treatment;
 - evaluate data by race, national origin, sex, and disability; and
 - identify work areas needing remediation.

Essential Element F: Responsiveness and Legal Compliance

Requires that Federal Agencies are in full compliance with EEO statutes and EEOC regulations, policy guidance, and other written instructions.

Compliance Indicators

- Reclamation personnel are accountable for timely compliance with orders issued by EEOC Administrative Judges.
- Reclamation has a system of management controls to ensure timely completion of orders and corrective actions and submits its compliance report to EEOC within 30 days.

Outcomes

- Reclamation maintains full compliance with Title VII and the Rehabilitation Act, including EEOC regulations, orders, and other written instructions.
- Reclamation reports program efforts and accomplishments to the Department and EEOC.

Strategies

- Reclamation includes an EEO element in all its supervisory performance standards.
- Implement, evaluate, monitor, and report Reclamation's MD-715 Strategic Plan for making progressive changes to the workplace by means of implementing planned actions and activities.

SPECIAL PROGRAM PLAN

Recruitment, Hiring, and Advancement of Individuals with Targeted Disabilities

Goal 1: Hiring

Reclamation will improve the employment status of individuals with targeted disabilities in fiscal years 2007-2010 by increasing the percentage of individuals with targeted disabilities from 1.4% to 2% of the total workforce by Fiscal Year 2007, with additional .5% increase each year until Fiscal Year 2010.

Strategies

- Implement Reclamation's Targeted Recruitment Plan for Individuals with Disabilities which will provide information on special hiring authorities, resources, and outreach/recruitment methods.
- Increase the education and awareness levels of managers and supervisors on the employment and advancement of individuals with disabilities.

Goal 2: Retention

Reclamation will increase the retention rate of individuals with targeted disabilities.

Strategies

- The Civil Rights Office will establish a corporate workgroup from EEO, HR, Management, and Reclamation's Disability Rights Coordinator to determine why individuals with targeted disabilities are leaving Reclamation and make recommendations for improvement.
- The workgroup will utilize findings and results from the Merit Promotion Assessment for insight into triggers and barriers directly impacting the retention of individuals with disabilities.
- The workgroup will work directly with managers and supervisors on retention initiatives and in providing guidance and assistance.

Reclamation Contacts for MD-715

Commissioner's Office/Denver Offices

Civil Rights Office (303) 445-3680
Human Resources Division (303) 445-2670

Pacific Northwest Region

EEO Office (877) 659-2729
Human Resources Office (208) 378-5140

Mid Pacific Region

EEO Office (916) 978-5571
Human Resources Office (916) 978-5474

Lower Colorado Region

EEO Office (702) 293-8584
Human Resources Office (702) 293-8492

Upper Colorado Region

EEO Office (801) 524-3717
Human Resources Office (801) 524-3656

Great Plains Region

EEO Office (406) 247-7626
Human Resources Office (406) 247-7728

To obtain a copy of the MD-715 Plan
or a text version of this brochure
please contact the Civil Rights Office at
(303) 445-3680.