**A Practical Guide to Addressing Common Issues and Possible Barriers
Which Asian and Native Hawaiian or Other Pacific Islander Employees May
Face in the Federal Work Force**

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In accordance with Executive Order 13515, which established the White House Initiative on Asian Americans and Pacific Islanders, the Equal Employment Opportunity Commission's (EEOC), Office of Federal Operations (OFO) provides this compilation of ideas and practices for improving equal employment opportunity in the federal work force for Asians, Native Hawaiians or Other Pacific Islanders (AAPI). The information provided comes from federal agency Management Directive 715 (MD-715) reports[1] for fiscal years 2006 through 2010.

Although we set forth below commonly identified issues that face AAPI federal employees and ideas for addressing them, there is no "one-size-fits-all" solution. Recognizing that agencies may face unique issues, MD-715 requires each agency to conduct self-assessments to identify and eliminate barriers that may affect its AAPI workforce. An agency will be able to choose from among these practices only after it has conducted the focused barrier analyses MD-715 requires.[2] For ease of use, the issues and practices are organized into the following areas: (1) outreach, recruitment, and hiring; (2) leadership development and career advancement; and (3) retention.

Outreach, Recruitment and Hiring

The most commonly reported issues and possible barriers to equal employment opportunity for AAPI employees and applicants concerning outreach, recruitment and hiring included:

- management's unfamiliarity with agency recruitment plans,
- limiting recruitment to specific geographic areas,
- lack of targeted recruitment, and
- AAPI applicants sometimes lack the skills and experience required for available positions.

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[1] MD-715 requires covered federal agencies to conduct a self analysis of their EEO program and annually report to EEOC their progress toward becoming a model EEO work place. http://www.eeoc.gov/federal/directives/md715.cfm

[2] MD-715 defines a "barrier" as "An agency policy, principle, practice or condition that limits or tends to limit employment opportunities for members of a particular gender, race or ethnic background or for an individual (or individuals) based on disability status." For examples of barrier analysis, see http://www.eeoc.gov/federal/directives/md715.cfm (MD-715 PART A/SECTION 717 OF TITLE VII/Proactive Prevention of Unlawful Discrimination) and Appendix B of EEOC's January 9, 2009 Asian American and Pacific Islander Work Group Report to the Chair of the Equal Employment Opportunity Commission.

In addition, many agencies that do not collect applicant demographic data reported that this limited their ability to identify barriers to AAPI opportunities.

MD-715 reports contained the following best practices for Outreach, Recruitment & Hiring:

- Inform managers and supervisors about the agency's lower-than-expected AAPI participation rate.

- Review policies, procedures, and practices related to targeted outreach, recruitment, and hiring (including vacancy announcements, use of certification lists, and the selection process for mission critical occupations by program/office/division/region) for possible barriers that have a negative impact on AAPI employees and applicants. Use a collaborative effort between EEO, HR and managers from applicable mission areas and, where necessary, develop action plans to eliminate identified barriers, including issuance of new guidance.

- Distribute a report to all agency management containing the results of barrier analyses and action plan(s) and the results of barrier elimination efforts.

- Meet with current AAPI employees to identify areas of concern.

- Direct resources to bolster efforts aimed at increasing the effectiveness of diversity recruitment. Add a senior level position and/or a specific outreach program manager position to address the recruitment of and outreach to the AAPI community and diversity-based groups and organizations. This program manager should coordinate all recruitment activities at both the local and national levels and evaluate the effectiveness of these efforts.

- Establish or enhance targeted recruitment plans to include goals, objectives and completion dates for increasing the number of AAPI applicants. Share the plan with managers, directors and office heads and require them to monitor their organization's progress in outreach and recruitment.

- Enhance nationwide recruitment coordination among the agency's headquarters and field organizations by including the EEO and HR offices and agency management.

- Ensure that initiatives targeted to improve the participation rate of AAPI employees in an agency's major occupations are included with other recruitment strategies.

- Train recruiters and hiring managers on potential areas of recruitment discrimination, including illegal use of job advertisements and recruitment agencies, word-of-mouth recruiting, homogenous recruiting, use of stereotyping in decision making, discriminatory screening of applicants, and sole source recruiting.

- Ensure recruitment and hiring staff attend and participate in activities such as local or national conferences and conventions whose audiences include AAPI employees/applicants such as the Asian Pacific American Annual Summit; Federal Asian Pacific American Council (FAPAC) Annual Conference; Organization of Chinese Americans Annual Convention; and the National Asian Pacific American Bar Association Annual Convention.

- Build and maintain partnerships with academia that have a high percentage (more than 5%) of AAPI students and faculty[3], professional organizations such as FAPAC, Asian Pacific American serving institutions, Native Hawaiian and Pacific Islander Advisory Council (PAAC), National Asian Pacific American Bar Association, and other AAPI-serving organizations for the purposes of developing a network with AAPI liaisons to cultivate high-quality recruits for current and future employment opportunities.

- Establish relationships with affinity groups to assist in retention and recruitment efforts directed at the AAPI community.

- Increase external outreach recruitment efforts by contracting social networking websites targeted to the AAPI community, e.g., AsianAvenue.com.

- Use the student educational employment programs and internships under the Pathways for Students and Recent Graduates to Federal Careers program to improve a pipeline of AAPI candidates for entry-level positions, including in mission critical occupations.[4]

- Fund, permit, and award scholarships to AAPI students throughout the country majoring in agency mission critical occupations, in an effort to have those students join the agency following graduation.

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[3] Federal agencies should particularly seek out institutions that are designated as Asian American and Native American Pacific Islander Serving Institutions (AANAPISIs), where Asian American and Native Pacific Islander students make up at least ten percent of undergraduate student enrollments.

[4] The Pathways Internship program replaced both the Student Career Experience Program (SCEP) and the Student Temporary Employment Program (STEP).

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- Recruit AAPI eligible employees from internal and external sources for mid and senior career hires.

- Dedicate resources to develop and implement an applicant tracking system for external and internal applicants to better understand if the agency is attracting qualified applicants and whether they are being hired into the agency. Make adjustments to agency outreach and recruitment efforts where necessary.

- Monitor the results of action plans for any changes in the agency workforce including increases or decreases in applications of qualified applicants, selection rates, participation rates in workforce mission critical and senior level positions, and in EEO complaints. Modify the action plans as necessary.

Leadership Development and Career Advancement

The most commonly reported issues and possible barriers to equal employment opportunity for AAPI employees and applicants concerning leadership development and career advancement included:

- attitudinal barriers which impede AAPI employees from seeking advancement or from being selected for leadership positions,
- management's failure to communicate advancement opportunities to AAPI employees, and
- an insufficient number of qualified AAPI employees in the eligible pool for career/leadership development programs for GS-15 and SES levels.

Government-wide data suggests the existence of a glass ceiling for AAPI female employees, especially at the SES Level. While participation rates for AAPI female employees in the GS-13 and GS-14 grade levels exceeded the total workforce participation rate, they drop dramatically at the SES levels.

MD-715 reports contained the following best practices for improving leadership development and career advancement:

- Establish cross functional teams with personnel from EEO, HR and managers from applicable mission critical areas to conduct focused barrier analysis on recruitment and selection practices at higher grade levels to determine why the feeder pool is inadequate and/or why selections are not being made. Develop action plans to address findings.

- Use focus group sessions with employees, unions, and advocacy groups, and meetings with other agency offices (programmatic and career development) to identify issues that may be affecting AAPI employees that

are not explained through raw data alone (e.g., the reasons qualified AAPI employees do not apply for details, and other development opportunities or jobs at the GS-14 and above level) and develop action plans to address findings.

- Collect and analyze pertinent data from grievances and/or EEO complaints related to AAPI employees, report findings of discrimination, and establish a plan to respond to those findings that includes preventive and remedial measures.

- Conduct and review the results of climate surveys, employee exit surveys, and the Federal Employee View Point Survey, to pin-point policies, practices or procedures that may present barriers to AAPI employees. Develop action plans to eliminate those barriers.

- Examine agency AAPI employee participation in government-wide executive development programs such as those offered through the Office of Personnel Management (e.g. the Federal Executive Leadership Program) and the Graduate School USA Leadership Development Programs, and how these programs are marketed to AAPI employees.

- Examine whether there are sufficient formalized succession planning processes in place to allow career development opportunities for AAPI employees to prevent qualified individuals from leaving the agency.

- Analyze workforce trends and projections to determine skill gaps and needs and then devise succession planning strategies to improve AAPI employee career progressions.

- Determine whether the eligibility requirements and selection criteria for career development programs are current, job-related and consistent with business necessity and evenly applied in selections throughout the agency.

- Adopt new criteria, policies and/or protocols, as necessary, to apply to all future career development training, mentoring or rotations, with the objective of achieving a closer alignment with agency succession planning process.

- Establish and/or update career and leadership development programs and processes, to embed diversity principles that ensure agency programs do not exclude AAPI participation.

- Ensure leadership involvement in and commitment to eliminating barriers to full AAPI participation by using monthly staff meetings and the annual

"state of EEO" briefing to educate managers and supervisors on the agency's lower-than-expected AAPI participation rate in senior level positions.

- Encourage AAPI employees to participate in agency career development and advancement opportunities and learn how to take advantage of those opportunities at regular intervals. Use electronic means to disseminate and market this information to ensure it is broadly available and not limited to any one part of the organization;

- Develop and deploy a series of diversity workshops to address specific issues/complaints regarding the non-selection of AAPIs for SES or other management positions. Require manager attendance.

- Develop and disseminate leadership skill inventories and encourage the use of established Leadership Skills Bank to identify and place high potential AAPI employees into developmental detail assignments and/or trainings that prepare candidates to assume leadership/management positions.

- Identify eligible AAPI employees in GS-13 and GS-14 levels and offer annual training opportunities to increase their skills for career advancement into GS-15 and SES positions.

- Ensure that new AAPI hires are made aware of the career development and advancement opportunities at the agency and how to take advantage of those opportunities. Make similar marketing efforts to current AAPI employees.

- Conduct career development workshops addressing the topics of mentoring, self-marketing, and managing diversity.

- Develop and implement a mentoring program to assist with AAPI employee development and track results.

- Expand outreach to the organizations and associations with a large base of qualified AAPI employees. Track the results of these outreach efforts in actual AAPI selections.

- Monitor agency mentoring programs to determine effectiveness and evaluate internal career development programs to ensure that programs do not exclude AAPI employees from participating.

Retention

MD-715 reports over the last three years show that voluntary separation rates of AAPI employees are higher than their participation rate in the total federal workforce and higher than those of other EEO groups. Although many agencies were not able to identify reasons for these trends, commonly recognized issues included;

- management's negative perceptions of AAPI employees' national origin (including accent and language),
- leadership abilities resulting in discriminatory practices impacted decisions regarding discipline, evaluations, and advancement in the workplace,
- agencies not holding management accountable when AAPI employees voluntarily resigned due to discrimination, and
- lack of opportunity to advance to the GS-15 and SES level which directly impacts voluntary separation rates.

Agencies also noted the fact that lack of data and inconsistent exit interview policies hampered their ability to conduct meaningful barrier analyses.

MD-715 reports contained the following best practices for retention:

- Ensure EEO is consulted on critical personnel decisions.

- Establish a cross functional team comprised of EEO, HR and, managers from appropriate mission critical areas to conduct a review of policies, procedures, and practices on noncompetitive promotions and awards, and generate a report containing the results. Develop action plans to clarify agency policy and procedures, and/or issue new guidance, as appropriate, and monitor the results of the changes.

- Appoint an AAPI Special Emphasis Program Manager (SEPM) to coordinate all advertising and recruitment activities at both the local and national levels; evaluate the effectiveness of these efforts; and participate in barrier analysis on recruitment, hiring, and career development and advancement processes and procedures.

- Have an AAPI SEPM conduct affinity group meetings with agency employees to gather employee experiences/perceptions regarding promotion opportunities/barriers for AAPI employees, share results with EEO office and jointly develop action plans to address findings.

- Conduct anonymous exit interviews formatted to ensure collection of relevant data on occupation, reasons for departure, race, national origin,

gender and disability. Analyze trends and develop action plans to address findings.

- Regularly analyze separation data to ensure that the root causes of separations for AAPI employees are identified and share this information with managers and supervisors.

- Examine AAPI employees' career development opportunities, including mentoring, long term training and details or rotational assignments available within the agency and facilitate career development. Monitor the results of these efforts.

- Regularly hold staff meetings to obtain input on issues affecting staff and to inform staff of management and programming decisions.

- Encourage all managers, supervisors and staff to participate in all training sessions relevant to their job.

- Host an agency-wide Diversity Day and highlight contributions of AAPI employees both culturally and professionally.

- Ensure that new hires are aware of the career development and advancement opportunities at the agency and how to take advantage of those opportunities.

- Ensure components of the succession plan include career development and mentoring activities to increase greater participation of AAPI employees in the mid and senior level ranks.

- Provide training to managers and supervisors on cultural awareness and how negative attitudes, stereotypes, and cultural misconceptions can adversely impact decisions regarding discipline, evaluations and advancement in the workplace.

- Track findings of discrimination and hold senior leaders and management accountable through their performance plans for any discriminatory practices.

Conclusion

We have identified some of the common issues and barriers facing AAPI federal employees and applicants, and practices utilized to alleviate them. EEOC will continue to monitor MD-715 reports and other sources for identified barriers and practices that may prove useful to creating an inclusive workplace where AAPI

employees, along with other groups, can reach their full potential in the federal workplace.

For additional guidance on barrier analysis, agencies may request technical assistance from OFO's Agency Oversight Division. Additional training is available through EEOC's Federal Outreach and Training Division.