

Statement of Work (SOW)
U.S. Customs and Border Protection (CBP)
Privacy and Diversity Office

1. BACKGROUND

U.S. Customs and Border Protection (CBP) is one of the Department of Homeland Security's largest and most complex Components, with a priority mission to protect the American people, safeguard our borders, and enhance the Nation's economic prosperity. Within CBP's Office of the Commissioner, the Privacy and Diversity Office (PDO) is responsible for developing and administering all policies and directives related to ensuring full compliance with the Privacy Act, Freedom of Information Act (FOIA), Federal diversity and inclusion policies, Equal Employment Opportunity (EEO) laws, and Civil Rights and Civil Liberties laws.

The U.S. EEO Commission (EEOC)'s regulations require federal agencies to conduct a continuing campaign to eradicate every form of prejudice or discrimination from personnel policies, practices, and working conditions. This continuing campaign requires agencies to conduct a self-assessment every year to monitor progress, identify areas where barriers may operate to exclude certain groups and develop strategic plans to eliminate identified barriers. The barrier analysis process requires starting with a thorough exploration of the agency's workforce data. Conclusions concerning the existence of workplace barriers cannot be drawn from numerical assessments. To identify specific policies, procedures, or practices, agencies need to explore other sources of data, including EEO complaint data, grievance data, exit interview data, results from surveys and focus groups, anecdotal evidence from various stakeholders, and reports from outside organizations.

A trigger is a trend, disparity, or anomaly that suggests the need for further inquiry into a particular policy, practice, procedure, or condition. It is simply a red flag. Triggers can be gleaned from various sources of information, beginning with workforce statistics.

A barrier is an agency policy, principle, or practice that limits, or tends to limit, employment opportunities for members of a particular EEO group based on their sex, race, ethnic background, or disability status. Employment barriers are commonly built into the organizational and operational structures of an agency and are embedded in the day-to-day procedures and practices of the agency.

1.1 Types of Barriers to Equal Opportunity

Barriers generally fall within one of three broad categories: institutional and structural; attitudinal; and physical.

1.1.1 Institutional and Structural Barriers

Institutional or structural barriers relate to rules, restrictions, requirements, routines, traditions, or habits within the agency. Since these policies, procedures, and practices are seamlessly integrated into the workplace culture, they may remain unnoticed inhibitors to equal employment opportunity.

1.1.2 Attitudinal Barriers

Attitudinal barriers involve actions or beliefs that inhibit equitable progress for one or more protected groups in the agency's workforce. These barriers often result from stereotypes or false assumptions, which can be the most difficult barriers to identify.

1.1.3 Physical Barriers

Physical barriers result from the inaccessibility of agency facilities or programs to one or more protected groups of employees or applicants.

1.2 Where Barriers to Equal Opportunity are Located

1.2.1 Agency Policies

Policies refer to guidance, usually written, setting forth the agency's position on a particular issue. By itself, a policy is generally non-operative, meaning that it cannot be implemented without specific procedures. Policies and procedures are sometimes combined in one document.

1.2.2 Agency Procedures

Procedures are how a policy is actually implemented. Procedures usually specify instructions step-by-step, and they are frequently provided in writing, although not necessarily in a formal document.

1.2.3 Agency Practices

Practices refer to the means and manner with which the procedures that implement the policies are carried out. Practices are frequently not written.

1.3 The EEOC's Recommended Barrier Analysis Process

1.3.1 Step One: Identify Triggers Using a Variety of Sources

- a) Take, review, and refine compulsory snapshots.
- b) Take additional snapshots, as needed.
- c) Review other information sources.
- d) Analyze employment processes.

1.3.2 Step Two – Investigate to Pinpoint Actual Barriers and Causes:

- a) With workforce data, determine appropriate benchmarks, compare rates, and note net changes.
- b) Heed triggers from other sources.
- c) Use barrier analysis questions to pinpoint barriers and determine causes.

1.3.3 Step Three – Barrier Elimination:

- a) Devise a plan to address barrier causes.
- b) Determine whether barriers are job-related and consistent with business necessity.
If not, create a plan to eliminate those barriers.
- c) Consider modifications even where barriers are job-related and consistent with business necessity.
- d) Annually describe plan and progress to EEOC.

1.3.4 Step Four – Assess Success of Plan:

- a) Track measurable progress.
- b) Hold agency officials accountable.
- c) Conduct periodic re-assessments to adjust plan, if necessary.

1.4 The EEOC's Recommended Barrier Analysis Questions

See Appendix A.

2. SCOPE

This Task Order (TO) is required to procure integrated consulting services to support the analysis of CBP's policies, procedures, practices, and conditions for barriers to equal opportunity, using the scientific method and the EEOC's Questions to Guide the Barrier Analysis Process. CBP's Privacy and Diversity Office (PDO) also requires that recommendations be developed and provided for removing these barriers to employee equal opportunity.

3. OBJECTIVES, PERIOD OF PERFORMANCE, AND REQUIRED TASKS

Base Period – 12 months from date of award

- Analysis Plan: Create an Initial Barrier Analysis Plan based on CBP's Trigger Analysis
- Objective 1: Barrier Analysis for CBP's triggers in recruiting
- Objective 2: Barrier Analysis for CBP's triggers in hiring
- Objective 3: Barrier Analysis for CBP's triggers in onboarding
- Objective 4: Barrier Analysis for CBP's triggers in initial training
- Recommendations: Recommendations shall be developed and provided for resolving barriers for each of the objectives

Options:

- Option Period 1 (12 months):
 - Objective: Barrier Analysis for CBP's triggers in employee inclusion, accessibility, and job satisfaction.
 - Recommendations: Recommendations shall be developed and provided for resolving barriers found in the optional barrier analysis.

- Option Period 2: (12 months):
 - Objective: Barrier Analysis for CBP's triggers in employee awards and recognition.
 - Recommendations: Recommendations shall be developed and provided for resolving barriers found in the optional barrier analysis.
- Option Period 3: (12 months):
 - Objective: Barrier Analysis for CBP's triggers in career advancement and separation.
 - Recommendations: Recommendations shall be developed and provided for resolving barriers found in the optional barrier analysis.

3.1 Barrier Analysis Process

CBP will provide the contractor with CBP's Trigger Analysis, copies of CBP's policies and written procedures that are obviously relevant to the triggers, and copies of other data that PDO expects will be relevant.

The contractor will work with the PDO Project Manager to use EEOC's barrier analysis questions and the scientific method to identify barriers through the following process:

- a) Review CBP's Trigger Analysis and the relevant policies and procedures.
- b) Develop requests for information and data not included in CBP's trigger analysis.
- c) Gather this information by interviewing knowledgeable individuals, such as line employees, supervisors, managers, senior executives, union representatives, advocates, etc. Use surveys and focus groups where appropriate for gathering data from workforce groups.
- d) Form working hypotheses about the root causes of the observed triggers that CBP test by through actions such as policy changes.
- e) Develop action plans that will test the hypotheses. The action plans should confirm or refute the hypothesis based on how the actions affect the trigger in the future.

4. SPECIFIC TASKS/REQUIREMENTS:

All deliverable documents must comply with Section 508 of the Rehabilitation Act of 1973.

4.1 Conduct Project Kick-Off Meeting

The Contractor shall participate in a PDO kick-off meeting sponsored by PDO within five (5) business days of Task Order (TO) award. The purpose of the meeting is to introduce key Government and Contractor personnel, review and discuss the anticipated project schedule, identify possible risks or issues, and address any other issues the Government or Contractor wish to discuss. The Contractor shall be prepared to discuss any items requiring clarification and gather information as necessary to support the deliverable. The Contractor shall provide a written summary of the Project Kick-Off Meeting detailed in the meeting minutes.

Deliverable: (1) Project Kick-Off Meeting Minutes

4.2 Create an Initial Plan based on CBP's Trigger Analysis

The contractor shall review CBP's trigger analysis, CBP's workforce data, and the policies and procedures that CBP provides, with the objective of forming initial hypotheses about the root causes of the observed triggers that can be tested. The contractor shall develop requests for information and data that aren't included in CBP's trigger analysis. This includes requests for relevant policies and procedures that CBP didn't provide but that are necessary to perform the barrier analysis process, and information about practices and conditions that aren't the natural result of a resolvable barrier in a policy or procedure.

The contractor shall create an initial barrier analysis plan based on this review, the contractor's and PDO's hypotheses, and on identified missing information. The Initial Barrier Analysis Plan will be guided by EEOC's Barrier Analysis Questions and will document how the contractor and the PDO Project Manager will gather the missing information, and the subsequent analyses necessary to test the initial hypotheses.

The contractor shall work with PDO Project Manager to gather relevant information that will inform the barrier analysis process. This could include by interviewing knowledgeable individuals and groups of individuals, creating surveys, conducting focus groups, reviewing government reports external to CBP, reviewing relevant academic research, and reviewing CBP documents and systems for ease of accessibility to employees and applicants with disabilities.

The contractor shall work with the PDO Project Manager to conduct the barrier analysis using the scientific method and identify all employment policies, procedures, and practices that are barriers to equal opportunity. The contractor shall utilize all available data and shall update working hypotheses about the affected triggers throughout the process as it obtains new data.

Deliverables: (2) Request for additional information and data
(3) Initial Barrier Analysis Plan
(4) Results of each information gathering activity
(5) Documentation of data analyses that the contractor performed

4.3 Barrier Analysis for CBP's Triggers in Recruiting

CBP's recruitment process is how the agency convinces well qualified people to apply to its Job Opportunity Announcements. The process comprises two aspects: advertising and networking to reach applicants, and how potential applicants perceive CBP's jobs. Advertising and networking to reach applicants includes where and how CBP does advertising and recruiting. Potential applicants' perceptions of CBP's jobs, includes all factors that affect potential applicants' decisions to apply, such as CBP's image in underrepresented communities as well as requirements for individual positions, such as education, experience, languages, etc.

The contractor shall work with the PDO Project Manager to document the results of the barrier analysis in a Report of Barrier Analysis which shall discuss the triggers, the possible employment policies, procedures, and practices that could cause the observed triggers, initial hypotheses, the subsequent data collection and analysis, and the contractor's final hypotheses. It shall clearly lead the reader to the conclusions drawn. Each Report shall also document the

specific actions CBP can take to test each hypothesis, to confirm or refute the hypothesis. For triggers where the Barrier Analysis process was able to refute all hypotheses, then the contractor shall document how the triggers are not the result of barriers to equal opportunity.

Deliverables: (6) Report of Barrier Analysis for triggers in CBP's recruiting process.

4.4 Barrier Analysis for CBP's Triggers in Hiring

CBP's hiring process covers from the application submission until an applicant accepts or declines a tentative offer. This includes:

the length of time the hiring process takes,
which applicants are deemed qualified,
which applicants are referred and how they are referred,
which applicants are interviewed and how managers conduct interviews,
the effect that jobs being at specific CBP locations has on applicants' decisions to accept, such as the availability of accessible mass transit to people with disabilities who cannot drive.

Processes used to source and secure applicants

The contractor shall work with PDO Project Manager to document the results of the barrier analysis, the Report of Barrier Analysis shall discuss the triggers, the possible employment policies, procedures, and practices that could cause the observed triggers, initial hypotheses, the subsequent data collection and analysis, and the contractor's final hypotheses. It shall clearly lead the reader to the conclusions drawn. Each Report shall also document the specific actions CBP can take to test each hypothesis, to confirm or refute the hypothesis. For triggers where the Barrier Analysis process was able to refute all hypotheses, then the contractor shall document how the triggers are not the result of barriers to equal opportunity.

Deliverables: (7) Report of Barrier Analysis for triggers in CBP's hiring process.

4.5 Barrier Analysis for CBP's Triggers in Pre-employment

CBP's pre-employment process covers from the applicant accepting the tentative offer until the new employee's Entrance on Duty. The pre-employment process includes the Background Investigation, Medical exam, etc. Please note that EEOC hasn't created Barrier Analysis Questions for this area.

The contractor shall work with PDO Project Manager to document the results of the barrier analysis, the Report of Barrier Analysis shall discuss the triggers, the possible employment policies, procedures, and practices that could cause the observed triggers, initial hypotheses, the subsequent data collection and analysis, and the contractor's final hypotheses. It shall clearly lead the reader to the conclusions drawn. Each Report shall also document the specific actions CBP can take to test each hypothesis, to confirm or refute the hypothesis. For triggers where the Barrier Analysis process was able to refute all hypotheses, then the contractor shall document how the triggers are not the result of barriers to equal opportunity.

Deliverables: (8) Report of Barrier Analysis for triggers in CBP's pre-employment process.

4.6 Barrier Analysis for CBP's Triggers in Initial Training.

CBP's initial training process covers from the new employee's Entrance on Duty until the employee is working at their assigned duty station. The initial training includes training at the academies such as the Border Patrol Academy and all other training that is required to continue employment. Please note that EEOC hasn't created Barrier Analysis Questions for this area.

The contractor shall work with PDO Project Manager to document the results of the barrier analysis, the Report of Barrier Analysis shall discuss the triggers, the possible employment policies, procedures, and practices that could cause the observed triggers, initial hypotheses, the subsequent data collection and analysis, and the contractor's final hypotheses. It shall clearly lead the reader to the conclusions drawn. Each Report shall also document the specific actions CBP can take to test each hypothesis, to confirm or refute the hypothesis. For triggers where the Barrier Analysis process was able to refute all hypotheses, then the contractor shall document how the triggers are not the result of barriers to equal opportunity.

Deliverables: (9) Report of Barrier Analysis for triggers in CBP's initial training process.

4.7 Develop Recommendations for Resolving Barriers that were Identified During the Barrier Analyses.

The contractor shall work with PDO Project Manager to develop sound and tested recommendations for various actions that CBP can take that will eliminate or mitigate the identified barriers to equal opportunity. The contractor shall produce a Report of Recommended Actions that documents these recommendations. The contractor shall include a matrix of the actions by difficulty and impact, with 'easy to implement' changes to 'difficult to implement' changes on one axis and 'low impact on workforce' to actions with a 'high impact on the workforce' on a second axis. This categorization of recommendation will allow PDO to address "low hanging fruit" immediately, and plan to address more difficult issues on a longer timeline.

Additional recommended actions to test hypotheses or resolve the barriers should be included in the Report of Recommended Actions.

Deliverables: (10) Report of Recommended Actions

4.8 Reporting

The Contractor shall provide progress updates in person or via conference call with PDO on a weekly basis. Progress updates shall address schedule, performance, and status of all deliverables to include activities that will affect the contract period of performance, problems/risks found, recommended solutions to problems/risks identified, and work planned for the next period. At the COR's discretion, PDO may choose to receive progress updates less frequently if it determines a meeting is unnecessary.

The Contractor shall provide a monthly project report in writing no later than the fifth of each month. Each report shall include a summary of all Contractor work performed under the contract including, but not limited to, an assessment of technical status, schedule status, any travel

conducted, and any Contractor concerns or recommendations from the previous month, a complete tracking of deliverable due dates and submission dates, upcoming action items, and risks identified during the weekly updates. This report shall be used to justify the billing for each reporting period.

The Contractor shall provide a draft Project Execution Plan to successfully complete all tasks outlined all task outlined in this SOW, within fifteen (15) days after award for PDO's review, comment, and approval. The Contractor shall provide a final Project Plan to the COR not later than thirty (30) business days after TO award.

Deliverables: (11) Weekly Project Update
(12) Monthly Project Report
(13) Project Execution Plan

4.9 Optional 1: Barrier Analysis for CBP's Triggers in Employee Inclusion, Accessibility, and Job Satisfaction

CBP's retention process comprises four parts:

- Inclusion, Accessibility, and Job Satisfaction
- Awards and Recognition
- Career Advancement
- Separations

The first part, Inclusion, Accessibility, and Job Satisfaction encompasses EEO Complaints, harassment allegations, and union and administrative grievances. It also encompasses the availability of community resources that sustain employees long-term, such as the availability and convenience of services like childcare, medical care, grocery stores, etc. Please note that EEOC hasn't created Barrier Analysis Questions for this area.

The contractor shall work with PDO Project Manager to document the results of the barrier analysis, the Report of Barrier Analysis shall discuss the triggers, the possible employment policies, procedures, and practices that could cause the observed triggers, initial hypotheses, the subsequent data collection and analysis, and the contractor's final hypotheses. It shall clearly lead the reader to the conclusions drawn. Each Report shall also document the specific actions CBP can take to test each hypothesis, to confirm or refute the hypothesis. For triggers where the Barrier Analysis process was able to refute all hypotheses, then the contractor shall document how the triggers are not the result of barriers to equal opportunity.

Deliverable: (14) Report of Barrier Analysis related to employee inclusion, accessibility, and job satisfaction

4.10 Optional 2: Barrier Analysis for CBP's Triggers in Employee Awards and Recognition

The second part of CBP's retention process comprises awards and recognition and is straightforward. Please note that EEOC hasn't created Barrier Analysis Questions for this area.

The contractor shall work with PDO Project Manager to document the results of the barrier analysis, the Report of Barrier Analysis shall discuss the triggers, the possible employment policies, procedures, and practices that could cause the observed triggers, initial hypotheses, the subsequent data collection and analysis, and the contractor's final hypotheses. It shall clearly lead the reader to the conclusions drawn. Each Report shall also document the specific actions CBP can take to test each hypothesis, to confirm or refute the hypothesis. For triggers where the Barrier Analysis process was able to refute all hypotheses, then the contractor shall document how the triggers are not the result of barriers to equal opportunity.

Deliverable: (15) Report of Barrier Analysis related to employee awards and recognition

4.11 Optional 3: Barrier Analysis for CBP's Triggers in Career Advancement & in Separation

- **Optional Barrier Analysis for CBP's Triggers in Career Advancement**

The third part of CBP's retention process, career advancement, encompasses promotions and temporary assignments.

The contractor shall work with PDO Project Manager to document the results of the barrier analysis, the Report of Barrier Analysis shall discuss the triggers, the possible employment policies, procedures, and practices that could cause the observed triggers, initial hypotheses, the subsequent data collection and analysis, and the contractor's final hypotheses. It shall clearly lead the reader to the conclusions drawn. Each Report shall also document the specific actions CBP can take to test each hypothesis, to confirm or refute the hypothesis. For triggers where the Barrier Analysis process was able to refute all hypotheses, then the contractor shall document how the triggers are not the result of barriers to equal opportunity.

Deliverable: (16) Report of Barrier Analysis related to career advancement

- **Optional Barrier Analysis for CBP's Triggers in Separations**

The fourth part of CBP's retention process, separations, synthesizes how the barriers in the previous sections cause unequal employee separations.

The contractor shall work with PDO Project Manager to document the results of the barrier analysis, the Report of Barrier Analysis shall discuss the triggers, the possible employment policies, procedures, and practices that could cause the observed triggers, initial hypotheses, the subsequent data collection and analysis, and the contractor's final hypotheses. It shall clearly lead the reader to the conclusions drawn. Each Report shall also document the specific actions CBP can take to test each hypothesis, to confirm or refute the hypothesis. For triggers where the Barrier Analysis process was able to refute all hypotheses, then the contractor shall document how the triggers are not the result of barriers to equal opportunity.

Deliverable: (17) Report of Barrier Analysis related to separations

4.13 Optional: Recommendations for Resolving Barriers Found in Optional Barrier Analyses

For all options exercised: The contractor shall work with PDO Project Manager to develop sound and tested recommendations for various actions that CBP can take that will eliminate or mitigate the identified barriers to equal opportunity. The contractor shall produce a Report of Recommended Actions that documents these recommendations. The contractor shall include a matrix of the actions by difficulty and impact, with ‘easy to implement’ changes to ‘difficult to implement’ changes on one axis and ‘low impact on workforce’ to actions with a ‘high impact on the workforce’ on a second axis. This categorization of recommendation will allow PDO to address “low hanging fruit” immediately, and plan to address more difficult issues on a longer timeline.

Additional recommended actions to test hypotheses or resolve the barriers should be included in the Report of Recommended Actions.

Deliverable: (18) Report of Recommended Actions from Optional Barrier Analyses

4.13 Deliverables Chart

#	Deliverable	Due Date	Approver	Format	Reference
1	Project Kick Off Meeting Minutes	2 days post Project Kick-Off meeting	COR	MS Word	SOW 5.1
2	Request for additional information and data	15 days post TO award	COR	MS Word	SOW 5.2
3	Initial Barrier Analysis Plan	30 days post TO award	COR	MS Word	SOW 5.2
4	Results of each information gathering activity	5 days post Information Gathering Activity	COR	MS Word	SOW 5.2
5	Simple reports of data analyses	5 days post data analysis session	COR	MS Word	SOW 5.2
6	Report of Barrier Analysis for CBP’s recruiting process	220 days post TO award	COR	MS Word	SOW 5.3
7	Report of Barrier Analysis for CBP’s hiring process	220 days post TO award	COR	MS Word	SOW 5.4
8	Report of Barrier Analysis for CBP’s onboarding process	220 days post TO award	COR	E-mail	SOW 5.5
9	Report of Barrier Analysis for CBP’s initial training process	220 days post TO award	COR	E-mail	SOW 5.6
10	Report of Recommended Actions	250 Days Post TO award	COR	MS Word	SOW 5.7
11	Project Updates	Weekly	COR	E-mail	SOW 5.8
12	Project Report	Monthly	COR	MS Word	SOW 5.8
13	Project Execution Plan	Draft: 15 days post TO execution	COR	MS Word	SOW 5.8

#	Deliverable	Due Date	Approver	Format	Reference
		Final: 30 days post TO execution			
14	Report of Barrier Analysis related to employee inclusion, accessibility, and job satisfaction	270 days post Option Period exercised	COR	MS Word	SOW 5.9
15	Report of Barrier Analysis related to employee awards and recognition	270 days post Option Period exercised	COR	MS Word	SOW 5.10
16	Report of Barrier Analysis related to career advancement	270 days post Option Period exercised	COR	MS Word	SOW 5.11
17	Report of Barrier Analysis related to separations	270 days post Option Period exercised	COR	MS Word	SOW 5.11
18	Report of Recommended Actions from Optional Barrier Analyses	270 days post Option Period exercised	COR	MS Word	SOW 5.12

5. SECURITY AND CONFIDENTIALITY

Information generated by this TO shall be confidential and the sole property of CBP. As such, this information shall be accorded appropriate security. Reports and findings will not be distributed without approval from the COR. All reports shall be reviewed by, and distributed through, the COR.

The Vendor shall strictly adhere to all applicable privacy and confidentiality requirements associated with any verbal or written communication connected with employee personal information. All records shall be handled, transmitted, and stored in a manner that will not make them accessible to the public or unauthorized persons.

6. PLACE OF PERFORMANCE:

The Contractor will complete the majority of the work at Contractor's facilities. The Contractor will attend meetings virtually.

APPENDIX A - BARRIER ANALYSIS QUESTIONS

A.1 Recruitment

A.1.1 Agency Reputation

- 1) Do you currently have FEVS data for your agency, and are they broken down by demographic group?
 - a) I have FEVS data broken down by demographic groups.
 - i) Go to Question 2
 - b) I either do not have FEVS data, or they are not broken down by demographic group
 - i) Skip to Question 3
- 2) Examine your agency's demographic breakdown of responses to the following FEVS questions for the most recent year(s) available. If you see that certain demographic groups respond substantially more negatively than others do, please look into why those demographic groups responded more negatively.
 - a) "My work unit is able to recruit people with the right skills." [FEVS Q21]
 - b) "I recommend my organization as a good place to work." [FEVS Q40]
 - c) "I have a high level of respect for my organization's senior leaders." [FEVS Q61]
 - d) "How satisfied are you with the policies and practices of your senior leaders?" [FEVS Q66]
 - e) "Considering everything, how satisfied are you with your job?" [FEVS Q71]
- 3) If your agency uses a climate assessment survey other than the FEVS, are any of the questions similar to those in Question 2? If so, please describe any demographic disparities in the results.
- 4) Does the agency have a good reputation for diversity among its constituents?

A.1.2 Recruitment Plan

- 1) Does the agency recruit for this occupation?
 - a) If yes, go to Question 2
 - b) If no, skip to the Job Qualifications sub-section of the Recruitment section.
- 2) Does the agency have a recruitment plan (or recruitment schedule) for this occupation?
 - a) If yes, go to Question 3
 - b) If no, skip to the Recruitment Process sub-section of the Recruitment section
- 3) Is the same recruitment plan for this occupation used agency-wide?
 - a) If yes, skip to Question 5
 - b) If no, go to Question 4
- 4) Are there subcomponents/offices that do not use a recruitment plan for this occupation?
- 5) Are the triggers for this occupation specific to particular subcomponents/offices?
 - a) If yes, go to Question 6
 - b) If no, skip to Question 7
- 6) Do the subcomponents/offices that do not use a recruitment plan for this occupation have more triggers or more severe triggers than other subcomponents/offices?
- 7) Are any of the following statements about your recruitment plan true for this occupation?
 - a) The EEO office participated in the development of this plan.
 - b) The recruitment plan targets underrepresented EEO groups.

8) Has the agency established a recruitment goal for underrepresented EEO groups in the recruitment plan?

A.1.3 Recruitment Process

1) At which geographic level does the agency target its recruitment efforts for this occupation?

- a) National
- b) Regional
- c) Local

2) Does the applicant pool for this occupation reflect the labor market from which you recruit?

3) Does the agency utilize paper recruitment materials (e.g. brochures, flyers) when recruiting for this occupation?

4) Does the agency utilize the agency website when recruiting for this occupation?

5) Does the agency utilize recruiters when recruiting for this occupation?

Only answer Questions 6 through 11 if you use paper recruitment materials for this occupation.

6) Does your agency update the paper recruitment materials for this occupation at least annually?

7) Are your agency's paper recruitment materials sensitive to different cultural, racial, ethnic, gender, and disability statuses?

8) Are the HR staff/recruiters/hiring officials aware of the paper recruitment materials?

9) Do the HR staff/recruiters/hiring officials use the paper recruitment materials?

10) Has the EEO office reviewed and provided feedback on the recruitment materials?

11) If so, did the agency implement the EEO office's recommendations?

Only answer Questions 12 through 17 if you use your agency website to recruit for this occupation.

12) Does your agency update the recruitment section of the website at least annually?

13) Is the recruitment section of your agency website sensitive to different cultural, racial, ethnic, gender, and disability statuses?

14) Does the recruitment section of your agency website include a link to the reasonable accommodation procedures?

15) Does the recruitment section of your agency website have sufficient and accurate information?

16) Has the EEO office reviewed and provided feedback on the recruitment section?

17) If so, did the agency implement the EEO office's recommendations?

Only answer Questions 18 through 22 if you use recruiters to recruit for this occupation.

18) Does your agency train its recruiters on the following?

- a) Diversity principles
- b) The agency's recruitment goals
- c) The agency's hiring principles

19) Are the recruiters diverse?

20) Do the recruiters select the type of and location for recruitment activities?

21) Has the EEO office reviewed and provided feedback on the recruitment activities?

22) If so, did the agency implement the EEO office's recommendations?

A.1.4 Job Qualifications

- 1) Does the agency review the qualification requirements for this occupation annually to determine whether they are still current and necessary?
- 2) Do the selecting officials add additional requirements beyond OPM's description of the occupation?
- 3) Does the vacancy announcement for this occupation contain any of the following qualification requirements?
 - a) Specialized degrees (e.g., Masters, Doctorate, etc.). If so, are they truly necessary to perform the job well?
 - b) Specialized licenses (e.g., Bar, Accountant, Nursing, etc.). If so, are they truly necessary to perform the job well?
 - c) Technical qualifications. If so, are they truly necessary to perform the job well?
 - d) Specialized experience. If so, is it truly necessary to perform the job well?
 - e) Grade level. If so, is it truly necessary to perform the job well?
 - f) Any other qualification requirements. If so, are they truly necessary to perform the job well? Please describe these other qualification requirements.

A.1.5 Vacancy Announcements

- 1) Does the agency use USA Jobs to advertise vacancies for this occupation?
- 2) Does the agency use specific professional societies and associations to advertise vacancies for this occupation? If so,
 - a) Does your agency know the demographics of the professional societies and associations through which you advertise vacancies? If so,
 - i) Think about your workforce-based triggers for this occupation and the demographic make-up of professional societies and organizations through which you advertise vacancies. Are the EEO groups with low participation rates in this occupation well represented in these professional societies and associations?
 - b) Do any of these societies and associations focus on members of EEO groups with low participation rates in your agency?
- 3) Does the agency use specific colleges and universities to advertise vacancies for this occupation? If so,
 - a) Does the agency know the demographic profile of the students in majors related to this occupation at the colleges and universities through which you advertise vacancies? If so,
 - i) Think about your workforce-based triggers for this occupation and the demographic make-up of the colleges and universities through which you advertise vacancies. Are the EEO groups with low participation rates in this occupation well represented in these institutions?
 - b) Are any of the colleges and universities through which you advertise vacancies Historically Black Colleges or Universities (HBCU)?
 - c) Are any of the colleges and universities through which you advertise vacancies Minority Serving Institutions (MSI)?
 - d) Are any of the colleges and universities through which you advertise vacancies Historically Deaf Colleges (HDC)?
- 4) Does the agency use any specific journals and newspapers to advertise vacancies for this occupation? If so,

a) Does the agency know the demographic profile of the subscribers for the journals and newspapers in which you place vacancy announcements? If so,

i) Think about your workforce-based triggers for this occupation and the demographic make-up of the subscribers for the journals and newspapers in which you advertise vacancies. Are the EEO groups with low participation rates in this occupation well represented among subscribers?

b) Do any of the journals and newspapers in which you advertise vacancies focus on members of underrepresented EEO groups?

5) Does the agency use social media to advertise vacancies for this occupation? If so,

a) Does the agency know the demographic profile of the users of the social media outlets that you use to advertise vacancies for this occupation? If so,

i) Think about your workforce-based triggers for this occupation and the demographic make-up of the users of the social media outlets that you use to advertise vacancies for this occupation. Are the EEO groups with low participation rates in this occupation well represented among the social media users?

b) Do any of the social media sites that you use for advertising vacancies for this occupation focus on members of underrepresented EEO groups?

6) Does the agency use particular places of employment (e.g., the military) to advertise vacancies for this occupation? If so,

a) Does the agency know the demographic profile of the places of employment used to advertise vacancies for this occupation? If so,

i) Think about your workforce-based triggers for this occupation and the demographic make-up of the places of employment through which you advertise vacancies for this occupation. Are the EEO groups with low participation rates in this occupation well represented in these places of employment?

7) Does the agency use job fairs to advertise vacancies for this occupation? If so,

a) Does the agency know the demographic profile of the participants at the job fairs where you advertise vacancies for this occupation? If so,

i) Think about your workforce-based triggers for this occupation and the demographic make-up of the job fairs through which you advertise vacancies for this occupation. Are the EEO groups with low participation rates in this occupation well represented at these job fairs?

b) Do any of the job fairs where you advertise vacancies for this occupation focus on members of underrepresented EEO groups?

8) Does the agency use word of mouth to advertise vacancies for this occupation?

A.1.6 Application Process

1) Is the application process for this occupation clear and easy to follow?

2) Does the application ask how the applicant learned about the job opening?

a) If yes, go to Question 3

b) If no, skip to the Hiring section

3) Does the agency track how applicants learned about the vacancy?

a) If yes, go to Question 4

b) If no, skip to the Hiring section

4) Has the agency changed its recruitment efforts based on information on how applicants from underrepresented EEO groups learned about job openings for this occupation?

A.2 Hiring

A.2.1 Preliminary Question

- 1) Has the agency hired any new employees for this occupation in the last three years?

A.2.2 Applicant Flow Data

- 1) Does the agency collect applicant flow data for qualified applicants and selectees for this occupation?

- a) If yes, go to the Trigger Identification sub-section of the Hiring section
- b) If no, skip to the Selection Process Accountability sub-section of the Hiring section

A.2.3 Trigger Identification

- 1) Are there any EEO Groups underrepresented among new hires (selectees) for this occupation compared to their availability among qualified applicants?

- a) If yes, go to Question 2
- b) If no, skip to the Preliminary Questions sub-section of the Training and Development section

- 2) Which EEO Groups are underrepresented among selectees when compared to their availability among qualified applicants?

- 3) Is the selection rate also below the EEO group's availability in the occupational CLF?

- 4) Does the selection rate trigger for this occupation impact the entire agency?

- 5) Is the selection rate trigger specific to particular offices or programs?

- 6) Is the selection rate trigger specific to particular selecting officials?

A.2.4 Selection Process Accountability

- 1) Does the agency review the selection process periodically to ensure equal treatment for all protected EEO groups?

- 2) Do the EEO office and personnel offices review the selection process collaboratively?

- 3) Does the EEO office provide regular feedback to the personnel staff regarding the demographics of the selectees for this occupation?

- 4) Does the agency have a hiring goal for persons with targeted disabilities?

- a) If yes, go to Question 5

- b) If no, skip to Question 8

- 5) Are hiring and selection officials informed of the importance of achieving this hiring goal?

- 6) Is the hiring goal part of the performance standards of hiring and selection officials?

- 7) Are hiring and selection officials held accountable if they do not meet the hiring goal?

- 8) Does the agency utilize a hiring goal for any other protected EEO group?

A.2.5 Training the Hiring and Selection Officials

- 1) Are hiring and selection officials required to receive training on interviewing skills?

- 2) Are they skilled in interviewing people from various EEO groups?

- 3) Are they aware of the agency's hiring priorities?

- 4) Are they aware of the agency's hiring authorities, including Schedule A if applicable?
- 5) If Schedule A is an option for the agency, do they regularly utilize this hiring authority?

A.2.6 Rating and Ranking Applicants Stage

- 1) Has the agency established a "blind" hiring process for this occupation?
- 2) Does the agency remove the names of the applicants from resumes and other documents before submitting the best-qualified list to the hiring and selection officials?
- 3) Does the agency conduct any skill-based testing for this occupation prior to the interview stage?
 - a) If yes, go to Question 4
 - b) If no, skip to Question 5
- 4) Could this test result in disparities in the scores among protected EEO groups?
- 5) Does the agency conduct any background, credit, or similar inquiries prior to the interview stage?
 - a) If yes, go to Question 6
 - b) If no, skip to the Interviews and Selection Panels sub-section of the Hiring section
- 6) Could these background checks, credit checks, or similar inquiries result in disparities in the representation of protected EEO group among interviewees?
- 7) Are the background checks, credit checks, or similar inquiries critical for this occupation?

A.2.7 Interviews and Selection Panels

- 1) Do the hiring and selection officials conduct interviews and/or selection panels for this occupation?
 - a) If yes, go to Question 2
 - b) If no, skip to the Selection Factors sub-section of the Hiring section.
 - 2) Do the interviews and/or selection panels occur in-person?
 - 3) If an in-person interview or selection panel is not possible, will the hiring and selection officials schedule a video conference?
 - 4) Do the hiring and selections officials develop interview questions prior to meeting the applicants?
 - 5) Does the EEO or personnel staff review the questions prior to the interviews?
 - 6) Do the hiring and selection officials prepare a point-based scoring sheet for each of the questions?
 - 7) Do the hiring and selection officials ask the same questions in each interview?
 - 8) Do the hiring and selection officials objectively grade the applicants' responses?
- Only answer Questions 9 through 15 if selection panels are used for this occupation.
- 9) How does the agency decide who serves on the selection panels?
 - 10) Is the same panel used for many or most of the vacancies involving this occupation?
 - 11) Are the members of the selection panel diverse?
 - 12) Is the EEO office consulted about panel composition?
 - 13) Does each member of the panel rate and rank the applicants?
 - 14) Does the panel have to reach a unanimous consensus on the selectee?
 - 15) If not, who makes the final decision on the selectee?

A.2.8 Selection Factors

- 1) Do hiring and selection officials choose selectees based solely on their resumes and supporting documents?
- 2) Does one or more of the following factors influence the hiring and selection officials' hiring choices?
 - a) Educational background
 - i) Degrees
 - ii) Colleges or universities attended
 - b) Work history, including breaks in employment
 - c) Years of experience
 - d) Prior places of employment
 - e) Specialized experience
 - f) Responses to technical qualifications
 - g) Current salary
 - h) Current grade level
 - i) Writing samples
 - j) Recommendations
 - k) Performance appraisals
 - l) Personality/rapport
 - m) Other
- 3) Are all of the factors involved in hiring and selection officials' hiring decisions necessary for one to perform well in this occupation?
- 4) Could the consideration of unnecessary factors involved in hiring decisions cause disparities among EEO groups?

A.2.9 Issues Raised About Selections

- 1) Are there any EEO complaints with non-selection identified as the issue?
- 2) Are there any grievances with non-selection identified as the issue?
- 3) Has the union, the ombudsman, an advocacy group, a special emphasis group, or another group expressed concern regarding recent selections?
 - a) If yes, go to Question 4
 - b) If no, skip to the Training and Development Section
- 4) Did the agency respond to these concerns?
- 5) Did the agency establish an action plan?
- 6) Has the agency implemented the action plan?

A.3 Training and Development

A.3.1 Preliminary Questions

- 1) Does the agency offer training and development opportunities to its employees? (e.g., career development programs, job shadowing, details, special assignments, other)
 - a) If yes, continue this section
 - b) If no, skip to the Promotions section

A.3.2 Individual Development Plans

- 1) Are employees required to complete an Individual Development Plan (IDP)?
 - a) If yes, proceed to Question 2
 - b) If no, skip to the Needs and Resources for Training and Development subsection of the Training and Development section
- 2) Do IDPs provide development objectives linked to the work unit's mission/goals/objectives?
- 3) Does the agency develop and offer training and development opportunities after an assessment of the employees' IDPs that are linked to development objectives?
- 4) Does the supervisor/employee evaluate the usefulness of training experiences?
- 5) Are IDPs being used effectively?

A.3.3 Needs and Resources for Training and Development

- 1) Does the agency survey its employees to ensure that their current skills will meet agency mission needs?
- 2) Does the agency assess employees' personal training and development needs?
- 3) Does the agency have a budget dedicated to providing training and development opportunities?
- 4) Does the agency track whether the budget is utilized for training and developmental opportunities?

A.3.4 Training and Development Announcements

- 1) Does the agency have a standard operating procedure (SOP) for announcing training and development opportunities?
 - a) If so, does the agency always follow the SOP for announcing each training and development opportunity?
- 2) Does the agency announce training and development opportunities to all employees?
- 3) Could some employees not receive the training and development announcements due to the nature of their job, their job location, their access to email or bulletin boards, or other reasons?
- 4) Has the union, an advocacy group or any other interested stakeholder expressed concern over the way in which the agency announces these opportunities?
 - a) If so, did the agency address these concerns?

A.3.5 Application Rates for Training and Development

- 1) Do employees have to apply to be selected for any training and development opportunities?
 - a) If yes, go to Question 2
 - b) If no, skip to the Selection Procedures for Training and Development sub-section of the Training and Development section
- 2) Does the agency track the application rates for training and development opportunities by EEO groups?
- 3) Do members of certain EEO groups apply to participate for training and development opportunities at rates lower than their representation among eligible employees?
- 4) Has the agency obtained feedback from EEO groups who apply at low rates as to why they are not applying for the training and development opportunities?

- 5) Is there a perception among certain EEO groups that they will not be selected for the training and development opportunities?
- 6) Has the union, an advocacy group or another interested stakeholder expressed concern over the application process for the training and development opportunities?
 - a) If so, did the agency address these concerns?

A.3.6 Selection Procedures for Training and Development

- 1) Does the agency have a standard operating procedure (SOP) for selecting employees to participate in training and development opportunities?
 - a) If yes, go to Question 2
 - b) If no, skip to Question 4
- 2) Does the agency always follow the SOP for each training and development opportunity?
- 3) Does the SOP address whether diverse employees should review, interview, and select the applicants?
- 4) Are the employees who review, interview and select applicants diverse?
- 5) Do the selecting officials receive diversity and inclusion training?
- 6) Prior to reviewing the applications, do the selecting officials establish objective criteria for choosing the applicants?
- 7) Do the selecting officials utilize the objective criteria to evaluate the applicants for training and development opportunities?

A.3.7 Interviews for Training and Development

- 1) Does the agency interview the applicants prior to selecting participants for training and development opportunities?
 - a) If yes, go to Question 2
 - b) If no, skip to the Selection Rates for Training and Development sub-section of the Training and Development section
- 2) If the agency interviews the applicants, does the agency develop standard questions prior to conducting the interviews?
- 3) During the interviews, does the agency ensure that all of the applicants receive the same questions?
- 4) Prior to the interviews, does the agency establish an objective scoring sheet for each of the interview questions?
- 5) Following the interviews, does the agency ensure that the applicants' responses to the questions are evaluated using the objective scoring sheet?
- 6) Does the agency rotate the individuals who review, interview and select applicants for training and development opportunities?
- 7) If the agency uses a rotation, does the agency compare the diversity of the training and development participants based on the individuals who reviewed, interviewed, and selected the participants?

A.3.8 Selection Rates for Training and Development

- 1) Does the agency track the number of applications and selection rates for training and development programs for EEO groups?

- a) If so, was the selection rate of any EEO group for training and development opportunities substantially lower than their application rate?
- 2) Do certain job series, grade levels, and/or offices receive a higher percentage of the training and development opportunities?
 - a) If so, are any EEO groups underrepresented in the job series, grade levels, and/or offices that receive a higher percentage of the training and development opportunities?
- 3) Do certain job series, grade levels, and/or offices receive a higher percentage of management and executive training and development opportunities?
 - a) If so, are any EEO groups underrepresented in the job series, grade levels, and/or offices that receive a higher percentage of the management and executive training and development opportunities?
- 4) Are there any EEO complaints or grievances wherein developmental opportunities, such as denial of training or non-selection for a detail, are identified as the issue?
 - a) If so, is there an identifiable trend in these complaints or grievances involving a particular EEO group, job series, office, or geographic location?
- 5) Has the union, an employee group, a special emphasis group or another interested stakeholder expressed concern regarding the distribution of training and development opportunities?
 - a) If so, did the agency address these concerns?

A.3.9 Results of Training and Development Opportunities

- 1) Does participation in the training and development opportunities lead to career advancement within the agency?
- 2) Is there a perception among certain EEO groups that their participation in the training and development opportunities will not improve their career advancement efforts?
- 3) Examine your agency's demographic breakdown of responses to the following FEVS questions for the most recent year available. If you see that certain demographic groups responded substantially more negatively than others do, please look into why those demographic groups responded more negatively.
 - a) "I am given a real opportunity to improve my skills in my organization." [FEVS Q1]
 - b) "My training needs are assessed." [FEVS Q18]
 - c) "Supervisors in my work unit support employee development." [FEVS Q47]
 - d) "How satisfied are you with the training you receive for your present job?" [FEVS Q68]
- 4) If your agency uses a climate assessment survey other than FEVS, are any of the questions similar to those in question (3)? If so, please describe the results.

A.4 Promotions

A.4.1 Applicant Data

- 1) Does your agency collect demographic information on employees eligible for internal promotions?
 - a) If so, for this occupation, are there any EEO Groups underrepresented among those receiving internal promotions based on their availability in the occupational CLF?
 - i) If yes, go to Question 2
 - ii) If no, skip to the Separations section

- 2) Does your agency collect data concerning the applicants, qualified applicants, and selectees for internal promotions?
 - a) If yes, go to Question 3
 - b) If no, skip to Question 6
- 3) Is the percentage of workers belonging to the underrepresented EEO group who applied for a promotion to this occupation lower than their availability in the relevant applicant pool (i.e., those who are eligible to apply)?
- 4) Is the percentage of workers belonging to the underrepresented EEO group who applied and were deemed "qualified" for this occupation lower than their availability in the applicant pool?
- 5) Is the selection rate of workers from the underrepresented EEO group lower than their availability in the qualified applicant pool?
- 6) Are there feeder groups (e.g., particular occupations, grade levels, etc.) for this occupation?
 - a) If so, are those feeder groups substantially similar to the occupational civilian labor force benchmark?
- 7) Are there career ladder positions that bridge to higher grades?
- 8) Are the triggers that are based on applicant data specific to a particular office or program?
- 9) Are the triggers that are based on applicant data specific to particular selecting officials?

A.4.2 Vacancy Announcements

- 1) Does the agency review the qualification requirements for this occupation annually to determine whether they are still current and necessary?
- 2) Do the selecting officials add additional requirements beyond OPM's description of the occupation?
- 3) Does the vacancy announcement for this occupation contain any of the following qualification requirements?
 - a) Specialized degrees (e.g., Masters, Doctorate, etc.). If so, are they truly necessary to perform the job well?
 - b) Specialized licenses (e.g., Bar, Accountant, Nursing, etc.). If so, are they truly necessary to perform the job well?
 - c) Technical qualifications. If so, are they truly necessary to perform the job well?
 - d) Specialized experience. If so, is it truly necessary to perform the job well?
 - e) Grade level. If so, is it truly necessary to perform the job well?
 - f) Any other qualification requirements. If so, are they truly necessary to perform the job well? Please describe these other qualification requirements.

A.4.3 Rating and Ranking Applicants Stage

- 1) Has the agency established a "blind" promotions process for this occupation?
- 2) Does the agency remove the names of the applicants from resumes and other documents before submitting the best-qualified list to the hiring and selection officials?
- 3) Does the agency conduct any skill-based testing for this occupation prior to the interview stage?
 - a) If so, could this test result in disparities in the scores among protected EEO groups?

A.4.4 Interviews and Selection Panels

- 1) Do the hiring and selection officials conduct interviews and/or selection panels for this occupation?
 - a) If yes, go to Question 2
 - b) If no, skip to the Selection Factors sub-section of the Promotions section
 - 2) Do the interviews and/or selection panels occur in-person?
 - 3) If an in-person interview or selection panel is not possible, will the hiring and selection officials schedule a video conference?
 - 4) Do the hiring and selections officials develop interview questions prior to meeting the applicants?
 - 5) Do EEO or personnel staff review the questions prior to the interviews?
 - 6) Do the hiring and selection officials prepare a point-based scoring sheet for each of the questions?
 - 7) Do the hiring and selection officials ask the same questions in each interview?
 - 8) Do the hiring and selection officials objectively grade the applicants' responses?
- Only answer Questions 9 through 15 if the agency uses selection panels for this occupation.
- 9) How does the agency decide who serves on the selection panels?
 - 10) Is the same panel used for many or most of the vacancies involving this occupation?
 - 11) Are the members of the selection panel diverse?
 - 12) Is the EEO office consulted about panel composition?
 - 13) Does each member of the panel rate and rank the applicants?
 - 14) Does the panel have to reach a unanimous consensus on the selectee?
 - 15) If not, who makes the final decision on the selectee?

A.4.5 Selection Factors

- 1) Do hiring and selection officials choose selectees based solely on their resumes and supporting documents?
- 2) Does one or more of the following factors influence the hiring and selection officials' promotion choices?
 - a) Educational background
 - i) Degrees
 - ii) Colleges or universities attended
 - b) Work history, including breaks in employment
 - c) Years of experience
 - d) Prior places of employment
 - e) Specialized experience
 - f) Responses to technical qualifications
 - g) Current salary
 - h) Current grade level
 - i) Writing samples
 - j) Recommendations
 - k) Performance appraisals
 - l) Responses to interview questions
 - m) Personality and/or rapport
 - n) Other

- 3) Are all of the factors involved in hiring and selection officials' hiring decisions necessary for one to perform well in this occupation?
- 4) Could the consideration of unnecessary factors involved in hiring decisions cause disparities among EEO groups?
- 5) Does the agency prefer to fill vacancies for this occupation with external hires?
 - a) If yes, go to Question 5
 - b) If no, skip to the Training the Hiring and Selecting Officials sub-section of the Promotions section
- 6) Has the agency evaluated whether the performance of new hires in this occupation exceeds that of employees who received an internal promotion?
 - a) If yes, go to Question 7.
 - b) If no, skip to the Training the Hiring and Selecting Officials sub-section of the Promotions section
- 7) Has the agency determined that new hires for this occupation are more successful than employees who received an internal promotion?
 - a) If yes, go to Question 8.
 - b) If no, skip to the Training the Hiring and Selecting Officials sub-section of the Promotions section
- 8) Has the agency identified skill deficits for the employees who received an internal promotion?
 - a) If yes, go to Question 9.
 - b) If no, skip to the Training the Hiring and Selecting Officials sub-section of the Promotions section
- 9) Has the agency developed a training program to address the skill deficits before the employees seek promotion to this occupation?

A.4.6 Training for the Hiring and Selecting Officials

- 1) Are hiring and selecting officials required to receive training on interviewing skills?
- 2) Are they skilled in interviewing people from various EEO groups?
- 3) Are they aware of the agency's hiring priorities?
- 4) Are they aware of the agency's hiring authorities, including Schedule A if applicable?
- 5) If Schedule A is an option for the agency, do they regularly utilize this hiring authority?

A.4.7 Promotion Process Accountability

- 1) Does the agency review the promotion process periodically to ensure equal treatment for all protected EEO groups?
- 2) Do the EEO office and personnel offices review the promotion process collaboratively?
- 3) Does the EEO office regularly provide feedback to the personnel staff regarding the demographics of the selectees for this occupation?
- 4) Does the agency have a hiring goal for persons with targeted disabilities?
 - a) If yes, go to Question 5
 - b) If no, skip to Question 8
- 5) Are hiring and selecting officials informed of the importance of achieving this hiring goal?
- 6) Is the hiring goal part of the performance standards of hiring and selection officials?
- 7) Are hiring and selecting officials held accountable if they do not meet the hiring goal?
- 8) Does the agency utilize a hiring goal for any other protected EEO group?

A.4.8 Issues Raised about Promotions

1) Examine your agency's responses to the following FEVS questions for the most recent year(s) available. How do your agency's responses differ from the government-wide average? Is there variation within your agency? Do certain demographic groups respond substantially more negatively than others do? If so, please look into why your agency or any groups might respond more negatively.

a) "Promotions in my work unit are based on merit." [FEVS Q22]

b) "How satisfied are you with your opportunity to get a better job in your organization?"

[FEVS Q67]

2) Are there any EEO complaints with promotions identified as the issue?

3) Are there any grievances with promotions identified as the issue?

4) Has the union, the ombudsman, an advocacy group, a special emphasis group, or another group expressed concern regarding recent promotions?

a) If yes, go to Question 5

b) If no, skip to the Separations Section

5) Did the agency respond to these concerns?

6) Did the agency establish an action plan?

7) Has the agency implemented the action plan?

A.5 Separations

A.5.1 Data Collection

1) Does the agency track employee separations, including disability retirement, by grade, occupation, office, race, sex, national origin, and disability?

a) If yes, go to the Trigger Identification sub-section of the Separations section

b) If no, skip to the Exit Interviews sub-section of the Separations section

A.5.2 Trigger Identification

1) Did a particular EEO group separate from the agency at a higher rate than their participation rate in the permanent workforce?

2) Did a particular EEO group voluntarily separate from the agency at a higher rate than their availability in the permanent workforce?

3) Did a particular EEO group involuntarily separate from the agency at a higher rate than their availability in the permanent workforce?

4) For each EEO group with a trigger involving their separation rate, can the agency identify a trend as to why they left the agency that is related to any of the following elements?

a) Grade level

b) Occupation

c) Supervisor status

d) Office

e) Region

5) Has the union, ombudsman, an employee advocacy group, special emphasis group, or any other interested stake holder expressed any concerns about the separation rate for a particular EEO group?

- a) If so, did the agency address the concerns?

A.5.3 Exit Interviews

- 1) Does the agency have a policy requiring exit interviews?
 - a) If yes, go to Question 2
 - b) If no, skip to Involuntary Separations
- 2) In practice, does the agency conduct exit interviews?
- 3) Does the agency track the exit interview data?
- 4) Does the agency regularly analyze the results of the exit interviews?
- 5) Has the agency identified any trends?

A.5.4 Involuntary Separations

- 1) Does the agency make efforts to ensure that it conducts involuntary separations in a fair and non-discriminatory manner?
- 2) Has the agency identified any trends in involuntary separations related to any of the following?
 - a) Grade level
 - b) Occupation
 - c) Supervisor status
 - d) Office
 - e) Region
- 3) Has the union, ombudsman, an employee advocacy group, special emphasis group, or any other interested stake holder expressed any concerns about the involuntary separation rate for a particular EEO group?
 - a) If yes, did the agency address the concerns?
- 4) For each EEO group with a trigger involving their involuntary separation rate, did the separations pertain to the following circumstances?
 - a) Reductions-in-force
 - b) Disciplinary removal
 - c) Constructive discharge

A.5.5 Reductions in Force

- 1) Has the agency experienced a reduction-in-force (RIF) during the last three years?
 - a) If yes, go to Question 2
 - b) If no, skip to the Disciplinary Removals sub-section of the Separations section
- 2) Did the selection factors used in the RIF have a disproportionate impact on the terminated employees in any of the EEO protected categories?
 - a) Race
 - b) Color
 - c) Religion
 - d) Sex
 - e) National Origin
 - f) Age
 - g) Disability

- h) Genetic Information
- i) Reprisal
- 3) Use the following tests to determine disproportionate impact of RIF:
 - a) Four-Fifths Rule: Was the selection rate for reduction in force of a particular EEO group less than 80% of the selection rate for the EEO group with the highest selection rate?
 - b) Two or More Standard Deviations: A standard deviation is a measure of dispersion used in statistics. Is the difference between two EEO groups' selection rate and its representation in the workforce greater than two standard deviations, and therefore, statistically significant?[1]
- 4) Can the agency justify the disproportionate impact of the reduction-in-force by showing that it was based on reasonable factors other than the employees' status in a particular EEO group?
- 5) Within 1 to 2 years of the RIF, did the agency announce any vacancies for the positions that were impacted by the RIF?
- 6) Are procedures in place to ensure reductions-in-force are conducted in a non-discriminatory manner?
- 7) Did the agency use multiple levels of decision making when deciding the selection factors?
- 8) Has the union, ombudsman, an employee advocacy group, special emphasis group, or any other interested stake holder expressed any concerns about the impact of the RIF on a particular EEO group?
 - a) If yes, did the agency address the concerns?

A.5.6 Disciplinary Removals

- 1) What was the workforce distribution of discipline, including removal, during the last fiscal year (grade, occupation, installation, race, sex, national origin, disability, EEO participation, types of discipline, etc.)?
- 2) Of the disciplinary actions based on conduct taken in the last fiscal year, was the rate of receipt substantially similar for all parts of the population?
 - a) If yes, skip to Question 8
 - b) If no, go to Question 3
- 3) Which groups received more or harsher discipline based on conduct than the others, and why?
- 4) Is the conduct of those groups subject to a higher level of scrutiny?
- 5) Do members of other groups engage in similar misconduct without having disciplinary actions proposed or taken against them?
- 6) Were there offices or subcomponents with higher rates of disciplinary removals based on conduct?
- 7) Are certain groups recommended for conduct-based discipline more frequently than others are, regardless of whether such discipline is implemented?
 - a) If so, are these recommendations for conduct-based discipline based on predetermined objective criteria, or are they highly subjective?
- 8) Of the disciplinary actions based on performance taken in the last fiscal year, was the rate of such actions substantially similar for all parts of the population?
 - a) If yes, skip to Question 17
 - b) If no, go to Question 9
- 9) Which groups received more or harsher discipline based on performance than the others, and why?
- 10) Is the performance of those groups subject to a higher level of scrutiny?

- 11) Do members of those groups receive opportunities to improve their performance at the same rate as members of other groups?
- 12) Were there offices or subcomponents with higher rates of disciplinary removals based on performance?
- 13) Are performance appraisals conducted in similar manners for all employees?
- 14) Are performance appraisals based on predetermined objective criteria, or are they highly subjective?
- 15) Are certain groups recommended for performance-based discipline more frequently than others are, regardless of whether such discipline is implemented?
 - i) If so, are these recommendations for performance-based discipline based on predetermined objective criteria, or are they highly subjective?
- 16) Do performance appraisal narratives or discipline recommendation narratives reveal stereotyping or otherwise negative views of certain EEO groups?
- 17) Who determines that disciplinary actions are warranted?
- 18) Is there a standardized method, such as a table of offenses, used for determining when disciplinary action is warranted and/or what type of disciplinary action is warranted?
 - a) If yes, go to Question 19
 - b) If no, skip to Question 21
- 19) Does the agency periodically review such standardized methods for determining the implementation and severity of disciplinary actions to ensure equal treatment regardless of race, religion, sex, national origin, disability, and EEO participation?
- 20) Is the EEO office consulted when developing or modifying the standardized methods for determining the implementation and severity of discipline?
- 21) Are there a substantial number of EEO complaints where discipline, including removal, is identified as the issue?
 - a) If so, is there an identifiable trend (i.e., particular group, supervisor, or installation)?
 - i) If so, what can be done to address this trend (objective criteria, better communication of process and expectations)?
- 22) Has the union, the ombudsman, an employee advocacy group, special emphasis group, or any other interested stakeholder expressed concern regarding the rate of discipline for a particular group?
 - a) If so, did the agency address the concerns?

A.5.7 Constructive Discharge

- 1) Have EEO complainants alleged constructive discharge as the issue of the complaint during the last three years?
 - a) If no, please skip to Question 2
 - b) If yes, was discrimination found in any of those complaints based on the following criteria
 - i) An objective, reasonable person in the complainant's position would have found the working conditions intolerable;
 - ii) Conduct that constituted discrimination created the intolerable working conditions; and
 - iii) The complainant's involuntary resignation resulted from the intolerable working conditions?

2) Has the union, the ombudsman, an employee advocacy group, special emphasis group, or any other interested stakeholder expressed concern about constructive discharge involving a particular group?

a) If so, what were the specific concerns raised and what is the agency's response?

A.5.8 Voluntary Separations

1) When an employee voluntarily leaves the agency, does the agency ask the employee's reason for leaving?

a) If no, skip to Question 4

b) If yes, go to Question 2

2) Did the former employees cite any of the following reasons as to why they left the agency?

i) Lack of training and development opportunities

ii) Lack of career advancement opportunities

iii) Discrimination by a supervisor

iv) Hostile work environment

v) Poor management practices (not discrimination or harassment)

vi) Failure to provide an accommodation (religious or disability-related)

vii) Overworked

3) Are some reasons for leaving the agency cited more often by members of particular EEO groups?

4) Has the union, ombudsman, an employee advocacy group, special emphasis group, or any other interested stakeholder expressed any concerns about the voluntary separation rate for a particular EEO group?

a) If so, did the agency address the concerns?

A.5.9 Employee Viewpoints and Voluntary Separations

1) Do you have FEVS data or data from a similar climate survey for your agency?

a) If no, you are done with this section

b) If yes, go to Question 2

2) Do your employees respond negatively to the following statements at a rate higher than the government-wide average?

a) "Policies and programs promote diversity in the workplace." [FEVS Q34]

b) "Prohibited Personnel Practices (for example, illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated." [FEVS Q38]

3) If you have FEVS data broken down by demographic group, do any demographic groups respond substantially more negatively than others do to the following questions?

a) "I am given a real opportunity to improve my skills in my organization." [FEVS Q1]

b) "I have sufficient resources (for example, people, materials, budget) to get my job done." [FEVS Q9]

c) "My workload is reasonable." [FEVS Q10]

d) "Policies and programs promote diversity in the workplace." [FEVS Q34]

e) "Prohibited Personnel Practices (for example, illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated." [FEVS Q38]

- f) "I recommend my organization as a good place to work." [FEVS Q40]
- g) "My supervisor/team leader provides me with opportunities to demonstrate my leadership skills." [FEVS Q43]
- h) "Supervisors/team leaders in my work unit support employee development." [FEVS Q47]
- i) "My supervisor/team leader treats me with respect." [FEVS Q49]
- j) "How satisfied are you with your opportunity to get a better job in your organization?" [FEVS Q67]
- k) "How satisfied are you with the training you receive for your present job?" [FEVS Q68]