



Health Resources and Services Administration
EEOC Management Directive 715
Annual Report
Fiscal Year 2017

Office of Civil Rights, Diversity and Inclusion
5600 Fishers Lane, 14N162
Rockville, Maryland 20857

EEOC FORM 715-01 PART A - D		U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
For period covering October 1, 2016 to September 30, 2017					
PART A Department or Agency Identifying Information	1. Agency		1. Department of Health and Human Services		
	1.a. 2 nd level reporting component		Health Resources and Services Administration		
	1.b. 3 rd level reporting component				
	1.c. 4 th level reporting component				
	2. Address		2. 5600 Fishers Lane		
	3. City, State, Zip Code		3. Rockville, Maryland 20857		
	4. CPDF Code	5. FIPS code(s)	4. HE34	5. 1189	
PART B Total Employment	1. Enter total number of permanent full-time and part-time employees				1. 1,892
	2. Enter total number of temporary employees				2. 59
	3. Enter total number employees paid from non-appropriated funds				3. 0
	4. TOTAL EMPLOYMENT [add lines B 1 through 3]				4. 1,951
PART C Agency Official(s) Responsible For Oversight of EEO Program(s)	1. Head of Agency Official Title		1. George Sigounas, HRSA Administrator		
	2. Agency Head Designee		2. Diana Espinosa, Deputy Administrator		
	3. Principal EEO Director/Official Official Title/series/grade		3. Anthony F. Archeval, EEO Director, Office of Civil Rights, Diversity and Inclusion, GS-260-15		
	4. Title VII Affirmative EEO Program Official		4. LaKaisha T. Yarber Jarrett		
	5. Section 501 Affirmative Action Program Official		5. Katherine A. Slye-Griffin		
	6. Complaint Processing Program Manager		6. Oscar Toledo		
	7. Other Responsible EEO Staff		LaKaisha T. Yarber Jarrett, (Principal MD-715 Preparer)		
			Yvonne Wills, Alternative Dispute Resolution Program Coordinator		
Jacqueline Calix, Hispanic Employment Program Manager, Federal Women's Program Manager					
B. Winona Chestnut, Disability Employment Program Manager/Selective Placement Program Coordinator					

EEOC FORM 715-01 PART A - D	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT
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PART D List of Subordinate Components Covered in This Report	Subordinate Component and Location (City/State)	CPDF and FIPS codes

EEOC FORMS and Documents Included With This Report		
*Executive Summary [FORM 715-01 PART E], which includes:	X	*Optional Annual Self-Assessment Checklist Against Essential Elements [FORM 715-01 PART G]
Brief paragraph describing the agency's mission and mission-related functions	X	*EEO Plan To Attain the Essential Elements of a Model EEO Program [FORM 715-01 PART H] for each programmatic essential element requiring improvement
Summary of results of agency's annual self-assessment against MD-715 "Essential Elements"	X	*EEO Plan To Eliminate Identified Barrier [FORM 715-01 PART I] for each identified barrier
Summary of Analysis of Workforce Profiles including net change analysis and comparison to RCLF	X	*Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals With Targeted Disabilities for agencies with 1,000 or more employees [FORM 715-01 PART J]
Summary of EEO Plan objectives planned to eliminate identified barriers or correct program deficiencies	X	*Copy of Workforce Data Tables as necessary to support Executive Summary and/or EEO Plans
Summary of EEO Plan action items implemented or accomplished	X	*Copy of data from 462 Report as necessary to support action items related to Complaint Processing Program deficiencies, ADR effectiveness, or other compliance issues
*Statement of Establishment of Continuing Equal Employment Opportunity Programs [FORM 715-01 PART F]	X	*Copy of Facility Accessibility Survey results as necessary to support EEO Action Plan for building renovation projects (not included)
*Copies of relevant EEO Policy Statement(s) and/or excerpts from revisions made to EEO Policy Statements	X	*Organizational Chart

EXECUTIVE SUMMARY

MISSION

The Health Resources and Services Administration (HRSA), an Operational Division (OPDIV) of the U.S. Department of Health and Human Services (HHS), improves access to health care for people who are geographically isolated, economically or medically vulnerable. This includes people living with HIV/AIDS, pregnant women, mothers and their families, and those in need of high quality primary health care. The OPDIV employs 1,951 civilian employees across five bureaus, ten offices, and ten regional offices whose primary responsibility is to provide leadership and financial support to health care providers throughout the United States and its territories. HRSA’s mission is to improve health and achieve health equity through access to quality services, a skilled health workforce, and innovative programs by 1) improving access to quality care and services; 2) strengthening the health workforce; 3) building healthy communities; 4) improving health equity; and 5) strengthening HRSA program management and operations. Through the OPDIV’s efforts, HRSA envisions a nation of “Healthy Communities, Healthy People.”

ASSESSING THE AGENCY’S EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

In FY 2018, HRSA, under the leadership of the Office of Civil Rights, Diversity and Inclusion (OCRDI), conducted its annual assessment of the Agency’s Equal Employment Opportunity (EEO) Program against the six essential elements of a model EEO program as defined by the Equal Employment Opportunity Commission (EEOC). The assessment was performed as part of the Agency’s ongoing obligation to eliminate barriers that impede free and open competition in the workplace and that prevent individuals of any racial or national origin group, sex, or disability status from realizing their full potential. The self-assessment findings indicated an overall improvement in the Agency’s EEO Program, as program strengths were noted in four of the six essential elements (Essential Elements A-C and F) in the FY 2016 assessment and five out of six essential elements (Essential Elements A-D and F) in FY 2017. However, the Agency continues to have deficiencies associated with Essential Element E, and has developed or modified appropriate corrective action plans in response to these deficiencies. These plans will be implemented in FY 2018 as outlined in Part H of this report, and progress toward eliminating the Agency’s EEO program deficiencies will be reported in subsequent annual reports.

Self-Assessment Findings: Agency EEO Program Strengths

HRSA’s self-assessment results indicated that the Agency fulfills the program requirements under Essential Elements A, B, C, D and F, as there are no EEO program deficiencies related to these areas. HRSA’s leadership continues to demonstrate a commitment to EEO for all employees and applicants and to hold Agency leaders responsible for the effective implementation of the Agency’s EEO Program and plan. EEO is integrated into the Agency’s strategic mission through the increased and intentional inclusion of OCRDI in activities pertaining to human capital management and succession planning initiatives. While in previous fiscal years the Agency reported that senior managers did not successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans, this program deficiency was eliminated in FY 2017 with the full implementation of Diversity and Inclusion Profile (DIP) action plans at the Bureau/Office level. Bureau/Office leaders were informed on the Agency’s EEO program status through DIP meetings led by OCRDI and OHR. These meetings highlight diversity, inclusion, reasonable accommodation, and compliance matters in the context of establishing and/or maintaining a diverse and inclusive workforce, and a work environment free of discrimination. Action plans developed and executed by each Bureau/Office address areas for improvement in each of the phases of the employment lifecycle (pre-hire, onboarding, engagement and retention, and separation).

With the implementation of these plans, managers play an active role in assessing the Agency’s EEO Program, identifying barriers to EEO, and developing correction plans.

Other principal activities that support HRSA's EEO Program strengths under Essential Elements A, B, C and D include:

- Briefing new employees and newly promoted supervisors on their roles, responsibilities, and rights related to the Agency's EEO program as well as providing a copy of the EEO policy statement during New Employee Orientation and New Supervisor Orientation, and through other outlets.
- Requiring new employees to complete EEO Awareness Training for HHS within 90 days of onboarding.
- Evaluating managers, supervisors and team leaders on their commitment to EEO principles as a standard part of their performance plans.
- Maintaining sufficient funding to ensure that HRSA's Complaints Program, Alternative Dispute Resolution (ADR) Program, and Reasonable Accommodation (RA) Program are available to current and former employees, as well as job applicants.
- Maintaining financial resources to not only train all EEO compliance staff as part of their mandatory professional development responsibilities, but also to make EEO and RA training available to all employees including managers and supervisors.
- Holding an annual "State of the Agency" briefing with the HRSA Administrator and Deputy Administrator and providing EEO program information regularly to the Administrator. The EEO Director has a monthly standing meeting with the Administrator, Deputy Administrator, and Chief Operating Officer to discuss EEO matters such as compliance activity, workforce representation, and special emphasis programs. In addition, the EEO Director is part of the Agency's Senior Leadership team, which meets bi-weekly. The EEO Director has direct access to the Administrator and regularly consults and advises the Administrator on EEO and diversity matters.
- Fostering ongoing communication and collaboration between the EEO Director and the HR Director through bi-weekly meetings that aim to ensure that the Agency's policies, procedures, and practices do not negatively impact any workforce demographic. The EEO Director also actively participates in bi-monthly Executive Officers meetings to further emphasize the importance of developing and maintaining processes that do not cause adverse impact to any one group of employees.

Additionally, the Agency remains in full compliance with EEOC regulations, policy guidance, and other written instructions and has no program deficiencies associated with Essential Element F (Responsiveness and Legal Compliance). HRSA ensures that Agency personnel are accountable for the timely completion of actions required to comply with EEOC orders, including orders issued by EEOC Administrative Judges. HRSA's Complaints Manager monitors and tracks compliance with settlement agreements and other EEOC orders. To ensure full implementation of any settlements, the Complaints Manager coordinates the efforts of Agency leadership, responsible management officials, OHR, and the Office of General Counsel (OGC).

Self-Assessment Findings: Agency EEO Program Deficiencies

The FY 2017 self-assessment results indicated that HRSA has the following EEO program shortcomings associated with Essential Element E (Efficiency): 1) sufficient resources have not been provided to conduct effective audits of field facilities' efforts to achieve a model EEO program and eliminate discrimination under Title VII and the Rehabilitation Act; 2) the Agency did not meet the EEOC's 2017 benchmark that 90% of all reasonable accommodation requests be processed according to agency timeframes; and 3) the Agency does not track and analyze recruitment activities.

Securing Sufficient Resources to Conduct Effective Field Audits

HRSA recognizes that an important aspect of ensuring an effective EEO program is to conduct EEO program audits of its regional offices. While the Agency routinely evaluates its Bureaus/Offices that are located at the Agency's headquartered building in Rockville, Maryland, HRSA does not assess the activities and environment at regional offices to ensure that all operations are free from discrimination and barriers to equal opportunity. The Agency does respond to EEO matters within regional offices that are brought to its attention. However, the Agency does not proactively assess the work environment at the regional offices. Therefore, in FY 2018, the Agency will work to secure appropriate funding to perform routine audits using a phased approach and report such activity in subsequent MD-715 reports as warranted.

Improving Timely Processing of Reasonable Accommodation (RA) Requests

While HRSA has effective systems in place for evaluating the impact and effectiveness of HRSA's EEO Complaints process as well as for ensuring an efficient and fair dispute resolution process, the Agency has identified an ongoing need to strengthen its efficiency in the area of RA, as fewer than 90% of the Agency's RA requests were processed within the established timeframes as required by EEOC. As previously reported, a review of the policy and detailed data analysis led to the conclusion that the established timeframes for processing RA requests were not practical and therefore were difficult to meet. In FY 2016, the Agency revised its RA Policy and Procedures Manual to reflect essential changes to the program to include changes to the RA case processing timeframes. The Agency received final approval to implement the policy on September 13, 2017. Moreover, the Agency began full implementation of the Reasonable Accommodation Processing and Tracking (RAPT) System to fully automate the RA request process, allowing for real-time, role-based user dashboards and the production of standard and customized reports. As a result of these two critical components, the Agency anticipates significant improvements in the timely processing of its RA requests and seeks to fully eliminate this barrier in FY 2018. Progress will be noted in future reports.

Routine Tracking and Analysis of Agency-wide Recruitment Efforts

For several fiscal years, HRSA has reported that Agency-wide recruitment efforts were not tracked and analyzed in accordance with MD-715 requirements. HRSA's solution to eliminating the barrier was the creation of an Agency-wide recruitment strategy inclusive of accountability/performance measures. However, through the DIP meetings, it was determined that the effort should be focused on identifying and assessing Bureau/Office recruitment practices and outcomes, as Bureaus/Offices indicated that they were conducting independent recruitment efforts, but were not evaluating the effectiveness of those efforts. Preliminary discussions were held between the Agency's EEO and HR office personnel to determine the feasibility of developing a recruitment tracking database. In FY 2018, discussions will continue and, if feasible, plans to develop and implement a data collection instrument as well as a tool to use when assessing the Agency's recruitment efforts will be created. Upon implementation, ongoing analysis of recruitment and selection data, as well as associated processes, will assist in monitoring progress and allow for the identification of barriers to EEO. These findings will be reported in subsequent MD-715 reports.

WORKFORCE ANALYSES

Data were analyzed to conduct trend analyses and identify triggers that may cause a barrier to equal opportunity for HRSA employees or applicants. Data used to generate this report were taken from ISMS Business Objects, and represent the civilian workforce; data on the Commissioned Corps, comprising 10.09% of HRSA's total workforce, are not included. The comprehensive analysis of HRSA's workforce data revealed a five-year continuation of underrepresentation among select race/national origin (RNO) and gender groups, and persons with a targeted disability, in 1) the overall civilian workforce, 2) mission critical occupations, and 3) senior level positions. Below is a summary of the workforce statistics used to identify and address these triggers.

In FY 2017, HRSA employed 1,951 civilian employees, 96.98% (1,892) of which held permanent positions. The Agency had a net gain of 57 civilian employees, reflecting a 3.01% net change in its workforce since FY 2016.

Race/Ethnicity, Gender, and Disability Representation in the Permanent Civilian Workforce

Race/Ethnicity and Gender

Female representation has declined to 70.98% (1,343) of the Agency's permanent workforce, but continues to surpass the percentage of females in the civilian labor force (48.14%). Fifty-three percent (1,007) of HRSA's permanent civilian workforce consists of racial/ethnic minorities in which Black (38.27%, or 724) and Asian (9.67%, or 183) employees have higher than expected participation rates when compared to the CLF benchmarks of 12.02% and 3.9%, respectively. Conversely, all other RNO groups have less than expected participation rates in the overall permanent civilian workforce, a pattern that has been noted for several fiscal years. American Indians/Alaska Natives comprise less than 1% of the workforce (0.69%, or 13), and so do employees of two or more races or unknown race at 0.05% (1). Also, there continues to be an absence of employees who self-identify as Native Hawaiian or other Pacific Islander. Despite accounting for 9.96% of the CLF, Hispanic employees make up 4.55% (86) of the workforce and 4.58% (6) of new hires. However, the

Hispanic employee separation rate is lower than expected, at 0.87% (1). Groups with higher than expected separation rates include males as a whole (30.43%, or 35), White males (20.87%, or 24), and White females (40%, or 46).

Disability

Persons with disabilities make up 7.93% (150) of the permanent workforce, and those with targeted disabilities comprise 1.43% (27). HRSA's hiring rate of persons with targeted disabilities remained nearly the same from FY 2016 (with 2.35% or 3 of new hires having targeted disabilities) to FY 2017 (2.29% or 3). However, in FY 2017, persons with targeted disabilities have separated at a rate that exceeds their rate of hire (4.35%, or 5). Because of these findings, participation rates of persons with targeted disabilities remain below the HHS Departmental 2% benchmark.

Mission Critical Occupations (MCOs)

Race/Ethnicity and Gender

The Agency's top three most populous MCOs are Public Health Program Specialists (0685), Management Analysts (0343), and Information Technology Specialists (2210). The 1,171 employees in these positions account for 61.89% of the permanent workforce. An analysis of the Agency's participation rates with these MCOs revealed that Black males, Black females, and Asian females were the only RNO and gender groups that had higher than expected participation rates in all three of the Agency's most populous MCOs. Asian males, Hispanic females, and the permanent female population as a whole, have a less than expected participation rate in one of the three job series—the 0343 series has fewer than expected Asian males at 1.42% when compared to the 3.4% RCLF—and the 2210 series has fewer than expected Hispanic females at 0% compared to the 1.6% RCLF, and females as a whole at 32.29% compared to the 33.2% RCLF). The remaining groups have low participation rates in at least two of the top three most populous MCOs. Note, White males, and males and females of two or more races or unknown race, have lower than expected representation in all three of these job series.

Fifty-six percent of new hires filled one of the top three most populous MCOs. Among them, none of the RNO and gender groups exceeded all three of the corresponding RCLF benchmarks, while females as a whole, Black males, Black females, Asian males, and Asian females exceeded two of the RCLF benchmarks; and males as a whole, Hispanic females, and White females exceeded only one RCLF benchmark. The remaining RNO and gender groups (Hispanic males, White males, American Indian/Alaska Native males and females, Native Hawaiian or other Pacific Islander males and females, and males and females of two or more races or unknown race) had lower than expected hiring rates for all three most populous MCOs compared to the RCLF benchmarks.

Disability

While all persons with a disclosed disability account for 7.93% (150) of the Agency's permanent workforce, this group accounts for 7.06% (51) in the 0685 workforce, 7.08% (25) in the 0343 workforce, and 8.33% (8) in the 2210 workforce. Persons with a disclosed targeted disability account for 1.43% (27) of the permanent workforce, 1.8% (13) in the 0685 series and 0% (0) in the 2210 series, while surpassing the HHS Departmental 2% benchmark in the 0343 series at 2.55% (9). Additionally, persons with targeted disabilities were represented among 4.35% (2) of new hires in the 0685 series, thereby exceeding the 2% benchmark for persons with targeted disabilities.

Senior Level Positions

Race/Ethnicity and Gender

When assessing whether triggers to EEO exist among any one group of employees in senior level positions, groups are compared to their overall participation rates in permanent GS- grades and the SES. To that end, 77.51% (1,465) of HRSA's permanent civilian workforce are in GS-13 positions or above. Specifically, 43.28% (818 employees) are in GS-13 positions, 20.05% (379) are in GS-14 positions, 12.91% (244) are in GS-15 positions, and 1.27% (24) are in the Senior Executive Service (SES). Despite having less than expected representation at HRSA as a whole, males hold higher than expected participation rates in most senior level positions. In fact, the presence of males is lower than expected in GS-13 positions, but they maintain higher

than expected participation rates in GS-14 positions and above, with the rates increasing as the grade level increases such that males account for 28.94% (547) of the Agency's permanent civilian workforce in GS and SES pay plans and 34.83% (132) of GS-14 employees, 36.07% (88) of GS-15 employees, and 33.33% (8) of the SES. This same pattern is also found among white males who account for 15.24% (288) of the permanent civilian workforce but 17.94% (68) of GS-14, 22.95% (56) of GS-15, and 25% (6) of SES positions. An inverse relationship was found among females, in which females had increasingly less than expected participation rates in GS-14 (65.17%, or 247), GS-15 (63.93%, or 156) and SES (66.67%, or 16) positions, despite accounting for 71.06% (1,343) of the Agency's permanent civilian workforce in GS and SES pay plans. Similar findings were found among Blacks, particularly Black females. Accounting for 29.63% (560) of the Agency's permanent civilian workforce, Black females were represented in GS-14 (23.22%, or 88), GS-15 (14.75%, or 36), and SES (16.67%, or 4) positions at less than expected rates. Note, the current participation rate of Black females in the SES reflects a 33.33% (1) increase since FY 2016; however, this group continues to show a less than expected participation rate in the SES. When assessing representation across the SES, Whites and Hispanics and Asian males have expected rates of participation. However, whereas Black females have a less than expected participation rate in the SES — Black males, Asian females, American Indian/Alaska Native males and females, and males and females of two or more races or unknown race, continue to have 0% representation, going as far back as FY 2015 (earlier for some of the aforementioned RNO and gender groups). These trends indicate the possible presence of blocked pipelines and glass ceilings. HRSA will explore the root causes of these trends throughout FY 2018 and report findings.

Disability

Further, persons with targeted disabilities possess less than expected participation rates in all senior level positions, relative to their overall permanent GS and SES representation at 1.43% (27). Workforce data indicate a decline in participation among this group with each increase in grade level such that they account for 1.34% (11) of GS-13, 0.79% (3) of GS-14, and 0.41% (1) of GS-15 positions. They are absent in the SES.

ACCOMPLISHMENTS

HRSA made the following notable accomplishments throughout FY 2017:

- Developed and disseminated Diversity and Inclusion Profile (DIP) reports highlighting the state of each Bureau/Office in developing and maintaining a model EEO program. The DIP reports and check-ins were used to identify and communicate Bureaus/Offices' workforce data, hiring goals (if any), and tools or best practices/strategies that can be employed by Bureau/Office leadership to diversify HRSA's applicant pool and workforce as a whole.
- Effective in late FY 2017, received final EEOC approval on the revised HRSA Reasonable Accommodation Policy and Procedures manual to rectify identified areas of risk while providing a more effective and efficient system for processing RA requests.
- Fully implemented the RAPTS, which automates the RA request process, allowing for real-time, role-based user dashboards and production of standard and customized reports. The system was integrated with existing HRSA systems to ensure efficiencies within the system and was rigorously tested to ensure full compliance with all Section 508 of the Rehabilitation Act of 1973 requirements.
- Provided interactive trainings for managers and supervisors on EEO compliance, Diversity and Inclusion, and RA to include timely and relevant topics such as bullying and anti-harassment. The Agency plans to conduct learning sessions related to sexual harassment in FY 2018.
- Held a "State of the Agency" briefing to inform the HRSA Administrator on the overall critical action plan for the Agency in FY 2017.
- Formalized the Agency's ERG Program and increased the number of ERGs to better assist the Agency in its efforts to establish and maintain a model EEO program.
- Formally established the Federal Women's Program and appointed a Disability Program Manager to coordinate the Agency's efforts to recruit and retain individuals with disabilities.

- Hired a senior data analyst to enhance the barrier analysis process and the work of the Special Emphasis Program Managers while also keeping leadership abreast of concerning data trends.
- Trained key EEO and HR personnel in barrier analysis to support the upcoming barrier analysis activities sponsored by the Agency's EEO office.
- In preparation for conducting a thorough and effective barrier analysis, performed workforce analyses and trigger identification on data associated with Women, Hispanic and Disability Employment and presented the findings to key stakeholders.

PLANNED ACTIVITIES FOR FY 2018

Highlights of HRSA's FY 2018 planned activities include:

- Continuing to utilize HRSA DIP reports and routine check-ins to engage with Bureaus/Offices on workforce data, recruitment, and tools or best practices/strategies that can be employed by Bureau/Office leadership to strengthen the Agency's EEO program.
- Implementing a series of data collection activities in support of conducting a thorough barrier analysis of women employment at HRSA.
- Devising and implementing a robust plan to conduct barrier analysis which includes engaging managers, HRSA Diversity and Inclusion Council, and Employee Resource Groups in the identification of the root causes of triggers associated with less than expected participation rates within the Agency's mission critical occupations and senior level positions and among persons with a disability and Hispanics.
- Through the leadership of the HRSA Diversity and Inclusion Council, drafting HRSA's multi-year diversity and inclusion strategic plan.
- Assessing the feasibility of developing a mechanism for tracking and analyzing the recruitment efforts of the Agency's Bureaus/Offices.

**CERTIFICATION OF ESTABLISHMENT OF CONTINUING
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS**

I, **Anthony F. Archeval, Director, Office of Civil Rights, Diversity and Inclusion
GS-260-15** am the

(Insert name above) (Insert official title/series/grade above)

Principal EEO Director/Official for **Health Resources and Services Administration**

(Insert Agency/Component Name above)

The agency has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and, as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program, are included with this Federal Agency Annual EEO Program Status Report.

The agency has also analyzed its work force profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice is operating to disadvantage any group based on race, national origin, gender or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.

/Anthony F. Archeval/

4/4/18

Signature of Principal EEO Director/Official
Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.

Date

/George Sigounas/

5/30/18





Signature of Agency Head or Agency Head Designee

Date

EEOC FORM 715-01 PART G	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT
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Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP Requires the agency head to issue written policy statements ensuring a workplace free of discriminatory harassment and a commitment to equal employment opportunity.

Compliance Indicator	EEO policy statements are up-to-date.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
Measures		Yes	No	
The Agency Head was installed on <u>05/01/2017</u> . Was the EEO policy statement issued within 6 - 9 months of the installation of the Agency Head? If no, provide an explanation.	X		The EEO Director presented the policy statement to the new Agency Administrator. The Agency issued the statement within the EEOC established 6-9 month timeframe, and the statement was signed in early 2018.	
During the current Agency Head's tenure, has the EEO policy statement been re-issued annually? If no, provide an explanation.			N/A. The current Agency Head has been in his position for less than one year. However, the Agency customarily re-issues its EEO policy statement annually and is in position to continue this practice.	
Are new employees provided a copy of the EEO policy statement during orientation?	X		During orientation, new employees are informed on the EEO policy and an electronic copy of the policy is emailed to new hires. Also, this information is included in the initial "offer letter."	
When an employee is promoted into the supervisory ranks, is s/he provided a copy of the EEO policy statement?	X			

 Compliance Indicator	EEO policy statements have been communicated to all employees.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
	Have the heads of subordinate reporting components communicated support of all agency EEO policies through the ranks?	<input checked="" type="checkbox"/>		
	Has the agency made written materials available to all employees and applicants, informing them of the variety of EEO programs and administrative and judicial remedial procedures available to them?	<input checked="" type="checkbox"/>		
	Has the agency prominently posted such written materials in all personnel offices, EEO offices, and on the agency's internal website? [see 29 CFR §1614.102(b)(5)]	<input checked="" type="checkbox"/>		
 Compliance Indicator	Agency EEO policy is vigorously enforced by agency management.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
	Are managers and supervisors evaluated on their commitment to agency EEO policies and principles, including their efforts to:	<input checked="" type="checkbox"/>		All senior executives have standard language in their performance plans regarding supporting EEO policies and programs as well as a diverse and inclusive workplace. There is also a standard element regarding demonstrated support for EEO policies and programs in non-SES performance plans for managers/supervisors.
	resolve problems/disagreements and other conflicts in their respective work environments as they arise?	<input checked="" type="checkbox"/>		There is a standard element regarding demonstrated support for EEO policies and programs in non-SES performance plans for managers/supervisors. Beginning in FY 2015, the Agency required managers/supervisors




			to be evaluated on their support for EEO principles, programs, and diversity in the workplace. A more robust set of measurements that align with the specific behaviors outlined in MD-715 is being considered for future implementation.
address concerns, whether perceived or real, raised by employees and following-up with appropriate action to correct or eliminate tension in the workplace?	X		There is a standard element regarding demonstrated support for EEO policies and programs in non-SES performance plans for managers/supervisors. Beginning in FY 2015, the Agency required managers/supervisors to be evaluated on their support for EEO principles, programs, and diversity in the workplace. A more robust set of measurements that align with the specific behaviors outlined in MD-715 is being considered for future implementation.
support the agency's EEO program through allocation of mission personnel to participate in community out-reach and recruitment programs with private employers, public schools and universities?	X		There is a standard element regarding demonstrated support for EEO policies and programs in non-SES performance plans for managers/supervisors. Beginning in FY 2015, the Agency required managers/supervisors to be evaluated on their support for EEO principles, programs, and diversity in the workplace. A more robust set of measurements that align with the specific behaviors outlined in MD-715 is being considered for future implementation.


<p>ensure full cooperation of employees under his/her supervision with EEO office officials such as EEO Counselors, EEO Investigators, etc.?</p>	<p>X</p>		<p>There is a standard element regarding demonstrated support for EEO policies and programs in non-SES performance plans for managers/supervisors.</p>
<p>ensure a workplace that is free from all forms of discrimination, harassment and retaliation?</p>	<p>X</p>		<p>There is a standard element regarding demonstrated support for EEO policies and programs in non-SES performance plans for managers/supervisors.</p>
<p>ensure that subordinate supervisors have effective managerial, communication and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications?</p>	<p>X</p>		<p>Supervisors are required to complete refresher training as well as attain 6 credit hours per year as part of the Supervisor Certification Program to ensure that they have basic leadership and management skills to support them in effectively communicating with employees regarding workload, agency policies and procedures.</p>
<p>ensure the provision of requested religious accommodations when such accommodations do not cause an undue hardship?</p>	<p>X</p>		<p>There is a standard element regarding demonstrated support for EEO policies and programs in non-SES performance plans for managers/supervisors. Beginning in FY 2015, the Agency required managers/supervisors to be evaluated on their support for EEO principles, programs, and diversity in the workplace. A more robust set of measurements that align with the specific behaviors outlined in MD-715 is being considered for future implementation.</p>





<p>ensure the provision of requested disability accommodations to qualified individuals with disabilities when such accommodations do not cause an undue hardship?</p>	<p>X</p>	<p>There is a standard element regarding demonstrated support for EEO policies and programs in non-SES performance plans for managers/supervisors. Beginning in FY 2015, the Agency required managers/supervisors to be evaluated on their support for EEO principles, programs, and diversity in the workplace. A more robust set of measurements that align with the specific behaviors outlined in MD-715 is being considered for future implementation.</p>
<p>Have all employees been informed about what behaviors are inappropriate in the workplace and that this behavior may result in disciplinary actions?</p>	<p>X</p>	<p>HRSA utilizes the following means to inform employees on penalties for unacceptable behavior: EEO policy statement, anti-harassment policy, HRSA SOP on Handling Workplace Harassment, HHS Table of Penalties, Executive Officers Meetings, new employee orientation, senior staff meetings, EEO Compliance Training, and the HRSA intranet and SharePoint sites for EEO and Human Resources.</p>
<p>Describe what means were utilized by the agency to so inform its workforce about the penalties for unacceptable behavior.</p>	<p></p>	<p></p>
<p>Have the procedures for reasonable accommodation for individuals with disabilities been made readily available/accessible to all employees by disseminating such procedures during orientation of new employees and by making such procedures available on the World Wide Web or Internet?</p>	<p>X</p>	<p></p>
<p>Have managers and supervisors been trained on their responsibilities under the procedures for reasonable accommodation?</p>	<p>X</p>	<p>HRSA Reasonable Accommodation for Managers and Supervisors training is available as part of the</p>

			Agency's Supervisor Certification Program.
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Essential Element B: INTEGRATION OF EEO INTO THE AGENCY'S STRATEGIC MISSION
Requires that the agency's EEO programs be organized and structured to maintain a workplace that is free from discrimination in any of the agency's policies, procedures or practices; and supports the agency's strategic mission.

 Compliance Indicator	The reporting structure for the EEO Program provides the Principal EEO Official with appropriate authority and resources to effectively carry out a successful EEO Program.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	
 Measures				
Is the EEO Director under the direct supervision of the agency head? [see 29 CFR §1614.102(b)(4)] For subordinate level reporting components, is the EEO Director/Officer under the immediate supervision of the lower level component's head official? (For example, does the Regional EEO Officer report to the Regional Administrator?)		X		The Agency head does not serve as the first line supervisor of any organizational component, including the EEO Office. However, the EEO Director reports to HRSA's Deputy Administrator, the same Agency head designee as the mission-related programmatic Bureaus and Offices.
Are the duties and responsibilities of EEO officials clearly defined?		X		
Do the EEO officials have the knowledge, skills, and abilities to carry out the duties and responsibilities of their positions?		X		
If the agency has 2 nd level reporting components, are there organizational charts that clearly define the reporting structure for EEO programs?		X		
If the agency has 2 nd level reporting components, does the agency-wide EEO Director have authority for the EEO programs within the subordinate reporting components?		X		
If not, please describe how EEO program authority is delegated to subordinate reporting components.				
 Compliance Indicator	The EEO Director and other EEO professional staff responsible for EEO programs have regular and effective means of informing the agency	Measure has been met		For all unmet measures, provide a brief

 Measures	head and senior management officials of the status of EEO programs and are involved in, and consulted on, management/personnel actions.	Yes	No	explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
Does the EEO Director/Officer have a regular and effective means of informing the agency head and other top management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program?		X		
Following the submission of the immediately preceding FORM 715-01, did the EEO Director/Officer present to the head of the agency and other senior officials the "State of the Agency" briefing covering all components of the EEO report, including an assessment of the performance of the agency in each of the six elements of the Model EEO Program and a report on the progress of the agency in completing its barrier analysis including any barriers it identified and/or eliminated or reduced the impact of?		X		
Are EEO program officials present during agency deliberations prior to decisions regarding recruitment strategies, vacancy projections, succession planning, selections for training/career-development opportunities, and other workforce changes?		X		
Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions such as re-organizations and re-alignments?		X		
Are management/personnel policies, procedures and practices examined at regular intervals to assess whether there are hidden impediments to the realization of equality of opportunity for any group(s) of employees or applicants? [see 29 C.F.R. § 1614.102(b)(3)]		X		Typically, reviews occur when new policies have been established. However, in late FY 2017, the Agency has established a workgroup to develop a standardized assessment tool and schedule to use when reviewing Agency policies, procedures and practices for impediments to EEO for employees and applicants.
Is the EEO Director included in the agency's strategic planning, especially the agency's human capital plan, regarding succession planning, training,		X		






etc., to ensure that EEO concerns are integrated into the agency's strategic mission?				
 Compliance Indicator	The agency has committed sufficient human resources and budget allocations to its EEO programs to ensure successful operation.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
Does the EEO Director have the authority and funding to ensure implementation of agency EEO action plans to improve EEO program efficiency and/or eliminate identified barriers to the realization of equality of opportunity?		X		
Are sufficient personnel resources allocated to the EEO Program to ensure that agency self-assessments and self-analyses prescribed by EEO MD-715 are conducted annually, and to maintain an effective complaint processing system?		X		
Are statutory/regulatory EEO-related Special Emphasis Programs sufficiently staffed?		X		
Federal Women's Program - 5 U.S.C. 7201; 38 U.S.C. 4214; Title 5 CFR, Subpart B, 720.204		X		
Hispanic Employment Program - Title 5 CFR, Subpart B, 720.204		X		
People With Disabilities Program Manager; Selective Placement Program for Individuals With Disabilities - Section 501 of the Rehabilitation Act; Title 5 U.S.C. Subpart B, Chapter 31, Subchapter I-3102; 5 CFR 213.3102(t) and (u); 5 CFR 315.709		X		
Are other agency special emphasis programs monitored by the EEO Office for coordination and compliance with EEO guidelines and principles, such as FEORP - 5 CFR 720; Veterans Employment Programs; and Black/African American, American Indian/Alaska Native, Asian American/Pacific Islander programs?		X		
 Compliance Indicator	The agency has committed sufficient budget to support the success of its EEO Programs.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	


Are there sufficient resources to enable the agency to conduct a thorough barrier analysis of its workforce, including the provision of adequate data collection and tracking systems?	X		
Is there sufficient budget allocated to all employees to utilize, when desired, all EEO programs, including the complaint processing program and ADR, and to make a request for reasonable accommodation? (Including subordinate level reporting components?)	X		
Has funding been secured for publication and distribution of EEO materials (e.g. harassment policies, EEO posters, reasonable accommodation procedures, etc.)?	X		
Is there a central fund or other mechanism for funding supplies, equipment and services necessary to provide disability accommodations?	X		
Does the Agency fund major renovation projects to ensure timely compliance with Uniform Federal Accessibility Standards?		X	The Agency does not own the building and, therefore, does not fund these projects.
Is the EEO Program allocating sufficient resources to train all employees on EEO Programs, including administrative and judicial remedial procedures available to employees?	X		
Is there sufficient funding to ensure the prominent posting of written materials in all personnel and EEO offices? [see 29 C.F.R. § 1614.102(b)(5)]	X		
Is there sufficient funding to ensure that all employees have access to this training and information?	X		
Is there sufficient funding to provide all managers and supervisors with training and periodic updates on their EEO responsibilities:	X		
for ensuring a workplace that is free from all forms of discrimination, including harassment and retaliation?	X		HRSA has sufficient funding to provide EEO training to all employees and will focus on updating its anti-harassment module in FY 2018.
to provide religious accommodations?	X		HRSA has sufficient funding to provide EEO training to all employees and will focus on developing a plan to deliver information about





			religious accommodation in FY 2018.
to provide disability accommodations in accordance with the Agency's written procedures?	X		
in the EEO discrimination complaint process?	X		HRSA has sufficient funding to provide EEO training to all employees and will focus on updating its EEO Complaints Processing module in FY 2018.
to participate in ADR?	X		HRSA has sufficient funding to provide EEO training to all employees and will focus on updating its EEO Complaints Processing module to include additional information on the ADR program in FY 2018.

Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY

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

 Compliance Indicator	EEO program officials advise and provide appropriate assistance to managers/supervisors about the status of EEO programs within each manager's or supervisor's area of responsibility.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	
 Measures				
	Are regular (monthly/quarterly/semi-annually) EEO updates provided to management/supervisory officials by EEO program officials?	X		
	Do EEO program officials coordinate the development and implementation of EEO Plans with all appropriate agency managers to include Agency Counsel, Human Resource Officials, Finance, and the Chief Information Officer?	X		
 Compliance Indicator	The Human Resources Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures are in conformity with instructions contained in EEOC management directives. [see 29 CFR § 1614.102(b)(3)]	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	
 Measures				
	Have time-tables or schedules been established for the agency to review its Merit Promotion Program Policy and Procedures for systemic barriers that may be impeding full participation in promotion opportunities by all groups?	X		A workgroup has been established to review and update the existing schedules and review process. Workgroup recommendations are expected in mid to late FY 2018.
	Have time-tables or schedules been established for the agency to review its Employee Recognition Awards Program and Procedures for systemic barriers that may be impeding full participation in the program by all group?	X		A workgroup has been established to review and update the existing schedules and review process. Workgroup recommendations are expected in mid to late FY 2018.
	Have time-tables or schedules been established for the agency to review its Employee Development/Training Programs for systemic barriers that may be impeding full participation in training opportunities by all groups?	X		A workgroup has been established to review and update the existing schedules and review process. Workgroup recommendations are expected in mid to late FY 2018.
 Compliance Indicator	When findings of discrimination are made, the agency explores whether or not disciplinary actions should be taken.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or





 Measures		Yes	No	complete and attach an EEOC FORM 715-01 PART H to the agency's status report
Does the agency have a disciplinary policy and/or a table of penalties that covers employees found to have committed discrimination?	X		The Agency follows the Douglas Factors for infraction of policies, rules or other misconduct.	
Have all employees, supervisors, and managers been informed as to the penalties for being found to perpetrate discriminatory behavior or for taking personnel actions based upon a prohibited basis?	X			
Has the agency, when appropriate, disciplined or sanctioned managers/supervisors or employees found to have discriminated over the past two years?	X		In FY 2017, training was required for two individuals as a result of a partial finding of discrimination based on disability for denial of a reasonable accommodation.	
<p style="text-align: center;">If so, cite number found to have discriminated and list penalty/disciplinary action for each type of violation.</p>				
Does the agency promptly (within the established time frame) comply with EEOC, Merit Systems Protection Board, Federal Labor Relations Authority, labor arbitrators, and District Court orders?	X			
Does the agency review disability accommodation decisions/actions to ensure compliance with its written procedures and analyze the information tracked for trends, problems, etc.?	X			




Essential Element D: PROACTIVE PREVENTION Requires that the agency head makes early efforts to prevent discriminatory actions and to eliminate barriers to equal employment opportunity in the workplace.				
 Compliance Indicator	Analyses to identify and remove unnecessary barriers to employment are conducted throughout the year.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
	Do senior managers meet with and assist the EEO Director and/or other EEO Program Officials in the identification of barriers that may be impeding the realization of equal employment opportunity?	X		
	When barriers are identified, do senior managers develop and implement, with the assistance of the agency EEO office, agency EEO Action Plans to eliminate said barriers?	X		
	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans?	X		This program deficiency was successfully eliminated in FY 2017. <i>See H.1 for details.</i>
	Are trend analyses of workforce profiles conducted by race, national origin, sex and disability?	X		
	Are trend analyses of the workforce's major occupations conducted by race, national origin, sex and disability?	X		
	Are trends analyses of the workforce's grade level distribution conducted by race, national origin, sex and disability?	X		
	Are trend analyses of the workforce's compensation and reward system conducted by race, national origin, sex and disability?	X		
	Are trend analyses of the effects of management/personnel policies, procedures and practices conducted by race, national origin, sex and disability?	X		
 Compliance Indicator	The use of Alternative Dispute Resolution (ADR) is encouraged by senior management.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
	Are all employees encouraged to use ADR?	X		




Is the participation of supervisors and managers in the ADR process required?	X		
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Essential Element E: EFFICIENCY







Requires that the agency head ensure that there are effective systems in place for evaluating the impact and effectiveness of the agency's EEO Programs as well as an efficient and fair dispute resolution process.

 Compliance Indicator	The agency has sufficient staffing, funding, and authority to achieve the elimination of identified barriers.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	
 Measures				
Does the EEO Office employ personnel with adequate training and experience to conduct the analyses required by MD-715 and these instructions?		X		
Has the agency implemented adequate data collection and analysis systems that permit tracking of the information required by MD-715 and these instructions?		X		
Have sufficient resources been provided to conduct effective audits of field facilities' efforts to achieve a model EEO program and eliminate discrimination under Title VII and the Rehabilitation Act?			X	See H.2 for details.
Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations in all major components of the agency?		X		
Are 90% of accommodation requests processed within the time frame set forth in the agency procedures for reasonable accommodation?			X	See H.3 for details.
 Compliance Indicator	The agency has an effective complaint tracking and monitoring system in place to increase the effectiveness of the agency's EEO Programs.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
Does the agency use a complaint tracking and monitoring system that allows identification of the location and status of complaints, and length of time elapsed, at each stage of the agency's complaint resolution process?		X		
Does the agency's tracking system identify the issues and bases of the complaints, the aggrieved individuals/complainants, the involved management officials and other information to analyze complaint activity and trends?		X		
Does the agency hold contractors accountable for delay in counseling and investigation processing times?		X		

If yes, briefly describe how: Provisions are included in the contract to hold contractors accountable for untimely deliverables.				
Does the agency monitor and ensure that new investigators, counselors, including contract and collateral duty investigators, receive the 32 hours of training required in accordance with EEO Management Directive MD-110?		X		
Does the agency monitor and ensure that experienced counselors and investigators, including contract and collateral duty investigators, receive the 8 hours of refresher training required on an annual basis in accordance with EEO Management Directive MD-110?		X		
 Compliance Indicator	The agency has sufficient staffing, funding and authority to comply with the time frames in accordance with the EEOC (29 C.F.R. Part 1614) regulations for processing EEO complaints of employment discrimination.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
Are benchmarks in place that compare the agency's discrimination complaint processes with 29 C.F.R. Part 1614?		X		
Does the agency provide timely EEO counseling within 30 days of the initial request or, within an agreed-upon extension in writing, up to 60 days?		X		
Does the agency provide an aggrieved person with written notification of his/her rights and responsibilities in the EEO process in a timely fashion?		X		
Does the agency complete the investigations within the applicable prescribed time frame?		X		
When a complainant requests a final agency decision, does the agency issue the decision within 60 days of the request?		X	The authority resides at HHS headquarters to issue FADs in a timely manner.	
When a complainant requests a hearing, does the agency immediately, upon receipt of the request from the EEOC AJ, forward the investigative file to the EEOC Hearing Office?		X		
When a settlement agreement is entered into, does the agency timely complete any obligations provided for in such agreements?		X		
Does the agency ensure timely compliance with EEOC AJ decisions which are not the subject of an appeal by the agency?		X		
 Compliance Indicator	There is an efficient and fair dispute resolution process and effective systems for evaluating	Measure has been met		For all unmet measures, provide a brief explanation in

 Measures	the impact and effectiveness of the agency's EEO complaint processing program.	Yes	No	the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
In accordance with 29 C.F.R. §1614.102(b), has the agency established an ADR Program during the pre-complaint and formal complaint stages of the EEO process?		X		
Does the agency require all managers and supervisors to receive ADR training in accordance with EEOC (29 C.F.R. Part 1614) regulations, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and in the benefits associated with utilizing ADR?		X		All managers and supervisors receive ADR training as part of the mandatory bi-annual EEO Awareness Training. The Agency is also launching an EEO Complaints Process Training for managers and supervisors that will include an ADR module.
After the agency has offered ADR and the complainant has elected to participate in ADR, are the managers required to participate?		X		
Does the responsible management official directly involved in the dispute have settlement authority?		X		Generally, the answer is yes; however, if the relief requested exceeds the authority of the RMO, the EEO settlement official may be engaged (e.g., reassignments, monetary settlements, etc.).
 Compliance Indicator	The agency has effective systems in place for maintaining and evaluating the impact and effectiveness of its EEO programs.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
Does the agency have a system of management controls in place to ensure the timely, accurate, complete and consistent reporting of EEO complaint data to the EEOC?		X		
Does the agency provide reasonable resources for the EEO complaint process to ensure efficient and successful operation in accordance with 29 C.F.R. § 1614.102(a)(1)?		X		

Does the agency EEO office have management controls in place to monitor and ensure that the data received from Human Resources is accurate, timely received, and contains all the required data elements for submitting annual reports to the EEOC?		X		
Do the agency's EEO programs address all of the laws enforced by the EEOC?		X		
Does the agency identify and monitor significant trends in complaint processing to determine whether the agency is meeting its obligations under Title VII and the Rehabilitation Act?		X		
Does the agency track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD-715 standards?			X	The Agency tracks recruitment efforts of the EEO and HR offices; however, the Agency is seeking to determine the most appropriate approach to tracking recruitment efforts of the organizational components and regional offices. See H.4 for details.
Does the agency consult with other agencies of similar size on the effectiveness of their EEO programs to identify best practices and share ideas?		X		
 Compliance Indicator	The agency ensures that the investigation and adjudication function of its complaint resolution process is separate from its legal defense arm of the agency or other offices with conflicting or competing interests.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
Are legal sufficiency reviews of EEO matters handled by a functional unit that is separate and apart from the unit which handles agency representation in EEO complaints?		X		
Does the agency discrimination complaint process ensure a neutral adjudication function?		X		
If applicable, are processing time frames incorporated into the legal counsel's sufficiency review for timely processing of complaints?				N/A; HRSA conducts its own legal sufficiency reviews within OCRDI.

Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE				
This element requires that federal agencies are in full compliance with EEO statutes and EEOC regulations, policy guidance, and other written instructions.				
 Compliance Indicator	Agency personnel are accountable for timely compliance with orders issued by EEOC Administrative Judges.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
	Does the agency have a system of management control to ensure that agency officials timely comply with any orders or directives issued by EEOC Administrative Judges?	X		
 Compliance Indicator	The agency's system of management controls ensures that the agency timely completes all ordered corrective action and submits its compliance report to EEOC within 30 days of such completion.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
	Does the agency have control over the payroll processing function of the agency? If Yes, answer the two questions below.	X		
	Are there steps in place to guarantee responsive, timely, and predictable processing of ordered monetary relief?	X		
	Are procedures in place to promptly process other forms of ordered relief?	X		
 Compliance Indicator	Agency personnel are accountable for the timely completion of actions required to comply with orders of EEOC.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
	Is compliance with EEOC orders encompassed in the performance standards of any agency employees?	X		
	If so, please identify the employees by title in the comments section, and state how performance is measured.	EEO Director EEO Complaints Manager Performance is measured using performance management appraisal plans.		

Is the unit charged with the responsibility for compliance with EEOC orders located in the EEO office?	X		
If not, please identify the unit in which it is located, the number of employees in the unit, and their grade levels in the comments section.			
Have the involved employees received any formal training in EEO compliance?	X		
Does the agency promptly provide to the EEOC the following documentation for completing compliance:	X		
Attorney Fees: Copy of check issued for attorney fees and/or a narrative statement by an appropriate agency official, or agency payment order stating the dollar amount of attorney fees paid?	X		
Awards: A narrative statement by an appropriate agency official stating the dollar amount and the criteria used to calculate the award?	X		
Back Pay and Interest: Computer print-outs or payroll documents outlining gross back pay and interest, copies of any checks issued, and a narrative statement by an appropriate agency official of total monies paid?	X		
Compensatory Damages: The final agency decision and evidence of payment, if made?	X		
Training: Attendance roster at training session(s) or a narrative statement by an appropriate agency official confirming that specific persons or groups of persons attended training on a certain date?	X		
Personnel Actions (e.g., Reinstatement, Promotion, Hiring, Reassignment): Copies of SF-50s?	X		
Posting of Notice of Violation: Original signed and dated notice reflecting the dates that the notice was posted? (A copy of the notice will suffice if the original is not available.)	X		
Supplemental Investigation: 1. Copy of letter to complainant acknowledging receipt from EEOC of remanded case; 2. Copy of letter to complainant transmitting the Report of Investigation (not the ROI itself unless specified); 3. Copy of request for a hearing (complainant's request or agency's transmittal letter)?	X		
Final Agency Decision (FAD): FAD or copy of the complainant's request for a hearing?	X		
Restoration of Leave: Print-out of statement identifying the amount of leave restored, if applicable? If not, an explanation or statement?	X		
Civil Actions: A complete copy of the civil action complaint demonstrating same issues raised as in compliance matter?	X		

Settlement Agreements: Signed and dated agreement with specific dollar amounts, if applicable? Also, is appropriate documentation of relief provided?	X		
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Footnotes:

1. See 29 C.F.R. § 1614.102.
2. When an agency makes modifications to its procedures, the procedures must be resubmitted to the Commission. See *EEOC Policy Guidance on Executive Order 13164: Establishing Procedures to Facilitate the Provision of Reasonable Accommodation* (10/20/00), Question 28.

EEOC FORM 715-01 PART H.1	<i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
Health Resources and Services Administration	FY 2017	
STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	<p>Essential Element D: PROACTIVE PREVENTION Do senior managers meet with and assist the EEO Director and/or other EEO Program Officials in the identification of barriers that may be impeding the realization of equal employment opportunity?</p> <p>When barriers are identified, do senior managers develop and implement, with the assistance of the agency EEO office, agency EEO Action Plans to eliminate said barriers?</p> <p>Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into Agency strategic plans?</p>	
OBJECTIVE:	To increase collaboration and partnership with HRSA senior leadership to 1) identify barriers to equal employment opportunity and 2) develop/implement plans to eliminate the barriers.	
RESPONSIBLE OFFICIAL:	Director, OCRDI Director, OHR HRSA Senior Leadership	
DATE OBJECTIVE INITIATED:	10/01/2014	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	08/31/2017	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:		TARGET DATE (MUST BE SPECIFIC)
Provide a "State of the Agency" briefing to the HRSA Administrator and senior leadership.		02/28/2015 Completed 12/31/2015
On an annual basis, develop and disseminate bureau/office-specific affirmative employment program and workforce data reports in collaboration with senior leaders.		09/30/2016 Completed 09/30/2016
Conduct annual meetings between OCRDI and HRSA senior leaders to discuss EEO principles, Reasonable Accommodation, EEO compliance, and potential barriers within Bureaus/Offices.		09/30/2016 Completed 09/30/2016
Assist Bureaus/Offices in developing corrective action plans to address identified barriers.		09/30/2016 Completed 09/30/2016

Provide a "State of the Agency" briefing to the HRSA Administrator and senior leadership.	03/31/2017 Completed 09/07/2017
On an annual basis, develop and disseminate bureau/office-specific affirmative employment program and workforce data reports in collaboration with senior leaders.	03/31/2017 Completed 08/31/2017
Conduct annual meetings between OCRDI and HRSA senior leaders to discuss EEO principles, Reasonable Accommodation, EEO compliance, and potential barriers within Bureaus/Offices.	05/31/2017 Completed 08/31/2017
Assist Bureaus/Offices in developing corrective action plans, inclusive of metrics, to address identified barriers.	6/30/2017 Completed 09/30/2017
Conduct follow-up meetings between OCRDI and HRSA senior leaders to discuss progress made on action plans and identify promising practices to enhancing the Agency's EEO program.	8/31/2017 Completed 09/30/2017

REPORT OF ACCOMPLISHMENTS AND MODIFICATIONS TO OBJECTIVE

Throughout this reporting period, senior leaders have become increasingly and intentionally involved in the identification and elimination of barriers that may impede the realization of EEO. In addition to providing a State of the Agency briefing to Agency leadership, for the past two years, the Agency's EEO Office has analyzed Bureau/Office level workforce data and identified triggers, which were communicated to Agency leaders through Diversity and Inclusion Profile (DIP) reports and briefings. Leaders were responsible for conducting root cause analyses and devising action plans to eliminate the identified barrier(s). Results indicate that Bureaus and Offices have employed strategies that are positively impacting the Agency's EEO program. Such activities include but are not limited to:

- Promoting participation in the HRSA-wide exit survey to assess why certain workforce segments are leaving the Bureau/Office or the Agency as a whole.
- Consulting with OCRDI prior to workforce changes to uphold diversity, inclusion and civil rights principles.
- Partnering with OCRDI to increase the number of EEO, RA, and Diversity and Inclusion trainings offered to supervisors.

As a result, many Bureaus and Offices experienced:

- Increased veteran hiring rates
- Increased disability hiring/utilization of Schedule A Hiring Authority (in some cases exceeding the EEOC-established disability hiring goals)
- Increased entry-level hiring to support a career pipeline
- Low overall separation rates
- Increased participation in career development opportunities
- Higher than expected provision of performance awards

Moreover, these steadfast efforts have resulted in an improved New Inclusion Quotient (IQ) and Employee Engagement Index (EEI) score not only within Bureaus and Offices, but also HRSA-wide. Specifically, HRSA's New IQ (66.2%) increased by 2.6 percentage points in FY 2017, and the Agency's EEI score (72.7%) rose by 2.7 percentage points in the same year. Therefore, it is through these strategic activities that the Agency has met its objectives to increase collaboration and partnership with HRSA senior leadership to 1) identify barriers

to equal employment opportunity and 2) develop/implement plans to eliminate the barriers. Thus, the Agency has successfully eliminated this program deficiency.

EEOC FORM 715-01 PART H.2	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
Health Resources and Services Administration		FY 2017
STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	Element E – Efficiency Sufficient resources have not been provided to conduct effective audits of field facilities' efforts to achieve a model EEO program and eliminate discrimination under Title VII and the Rehabilitation Act.	
OBJECTIVE:	Secure sufficient funding to successfully implement EEO field audits of the regional offices.	
RESPONSIBLE OFFICIAL:	Director, OCRDI	
DATE OBJECTIVE INITIATED:	10/01/2017	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	05/31/2018	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:		TARGET DATE (MUST BE SPECIFIC)
Develop a proposal, including a budget justification, for conducting field audits.		11/30/2017
Submit request for an increase in OCRDI's travel and training budget to fund two field audits in FY 2018.		11/30/2017
Secure approval from the Budget Office to acquire sufficient funding to support two field audits in FY 2018.		05/31/2018
REPORT OF ACCOMPLISHMENTS AND MODIFICATIONS TO OBJECTIVE		
This is a newly identified program deficiency. Accomplishments and/or modifications to this objective will be reported in the FY 2018 MD-715 Report.		

U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
EEOC FORM 715-01 PART H.3	
Health Resources and Services Administration	FY 2017
STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	Element E – Efficiency Fewer than 90% of accommodation requests were processed within the time frame set forth in the agency procedures for reasonable accommodation.
OBJECTIVE:	Ensure all RA requests are processed within the timeframe set forth in the agency's procedures for reasonable accommodation.
RESPONSIBLE OFFICIAL:	Director, OCRDI
DATE OBJECTIVE INITIATED:	09/10/2014
TARGET DATE FOR COMPLETION OF OBJECTIVE:	09/30/2018 (modified)
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (MUST BE SPECIFIC)
Recruit and hire a qualified manager to lead and oversee the activities of HRSA's Accessibility Team.	02/28/2016 (completed December 2015)
Deploy the web-based RA processing system for use by HRSA employees and management.	Completed (September 2016)
Finalize the RA Policy and Procedures Manual.	09/30/2017 (Completed 09/30/2017)
Provide a briefing to Diversity and Inclusion Council as well as the Council on Employees with Disabilities on the finalized RA Policy and Procedures Manual.	09/30/2017
Disseminate the finalized RA Policy and Procedures Manual.	10/31/2017 (Completed 09/30/2017)
Develop "RA Refresher Training for Managers and Supervisors" to acclimate HRSA management to the RAPT System.	09/30/2017 (Completed 09/30/2017)
Provide "RA Refresher Training for Managers and Supervisors" to acclimate HRSA management to the RAPT System and educate leaders on the revised RA policy and procedures.	09/30/2018
Perform quarterly RA processing audits to assess improvements in RA request processing times.	09/30/2018

Report findings and key steps to be taken to address any barriers to improving processing times to leadership.

09/30/2018

REPORT OF ACCOMPLISHMENTS AND MODIFICATIONS TO OBJECTIVE

For three years, HRSA has been working on revising the HRSA Reasonable Accommodations Policy and Procedures Manual. HRSA's previous RA Policy and Procedures Manual was signed in November 2012 and contained unintended risks to HRSA's RA Program. For example, the EEOC has historically required agencies to process 90% of all requests for RA within the timeframes established under agency RA policy. At HRSA, Section III, Part D of the RA Policy and Procedures Manual specifies that the Agency would approve or deny a request for RA in no more than 10 business days. Additionally, if a request was approved, the Agency had 10 business days to provide the accommodation to the requestor. A 5-year trend analysis (FY 2011 to FY 2015) was completed to analyze the appropriateness of these requirements. Despite clear improvements in the program's processing times, the rapid processing requirements were an on-going risk for the Agency as it had been unable to meet the EEOC's 90% requirement. Based on the analysis, a more tenable requirement of 15 business days from "request to decision" and 30 days "decision to provision" was established by the modified policy. These changes also brought HRSA's procedures in line with processing times used by other HHS OPDIVs.

The process of modifying the policy began in 2014 with a 9-month workgroup tasked with both the evaluation of RA program deficiencies and developing recommendations to improve program efficiency and effectiveness. That workgroup led to a number of critical program changes including the development and implementation of an RA processing system; increased training for HRSA staff and management; and implementation of a tiered, team approach for processing requests (instead of a single staff member processing all requests). HRSA implemented the final recommendation of the workgroup when the RA Policy was signed into effect following receipt of the Equal Employment Opportunity Commission's (EEOC) final approval on September 13, 2017.

The policy itself was repeatedly refined over time as it was bargained with the Agency's union (the National Treasurer Employees Union or NTEU) as well as being reviewed and approved by HRSA senior staff, the HHS Office of the Secretary, and the HHS Office of General Council. Additionally, when the EEOC released the final rule on Section 501 of the Rehabilitation Act of 1973 in January of this year, supplementary changes were made to ensure that HRSA's policy was fully compliant with all EEOC requirements.

The policy and procedures manual is accessible to all employees and applicants via Internet. The Agency provides a refresher training to employees that covers key elements of the revised RA policy and procedures. With the new RA policy in place, HRSA expects to see a significant improvement in the efficiency of case processing. Improvements are already visible in processing requests for disability services such as sign language interpreting and personal assistant services. These requests occur and require fast processing allowing for real time data analysis. "Typical" requests for accommodation such as telework, schedule changes, and workstation modifications occur over longer periods of time due to the addition of procurement processes and extended periods of time for the interactive process. Accordingly, these results will be fully evaluated at the end of Fiscal Year 2018.

EEOC FORM 715-01 PART H.4	<i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
Health Resources and Services Administration	FY 2017	
STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	Element E – Efficiency HRSA does not track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD-715 standards.	
OBJECTIVE:	Conduct routine analysis of recruitment and selection data and processes to identify potential barriers to EEO.	
RESPONSIBLE OFFICIAL:	Director, OCRDI Director, OHR HRSA Senior Leadership	
DATE OBJECTIVE INITIATED:	10/01/2011 10/01/2016 (modified)	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	12/31/2019	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (MUST BE SPECIFIC)	
Recruit and hire a qualified manager to lead and oversee the activities of HRSA's Diversity and Inclusion Team.	01/31/2016 (completed)	
Recruit and hire a qualified data analyst to assess the Agency's recruitment practices.	02/28/2017 (completed)	
Standardize the Bureau/Office recruitment checklist for Agency-wide implementation and data collection.	05/31/2018	
Educate key stakeholders (i.e., hiring officials, senior leaders, executive officers, human resource personnel) on their responsibilities utilize the recruitment checklist as a standard part of the pre-hiring consultation process.	07/31/2018	
Under the co-leadership of OCRDI and OHR, begin collaborating with Bureaus/Offices to routinely collect recruitment data.	09/30/2018	
Per fiscal year, analyze data to identify gaps in recruitment resources as well as barriers in the recruitment and selection processes.	09/30/2019	
Communicate findings and recommendations related to the recruitment and selection barrier analysis to Bureau/Office Directors, the Diversity & Inclusion Council, and appropriate EEO program staff.	12/31/2019	
Based on the feedback and data received from hiring officials as a result of using the checklist, determine the feasibility of creating a database used to capture all recruitment activity among Bureaus and Offices.	12/31/2019	

REPORT OF ACCOMPLISHMENTS AND MODIFICATIONS TO OBJECTIVE

Over the past few fiscal years, HRSA indicated that the Agency does not track or analyze its recruitment efforts to ensure EEO. Aside from analyzing applicant flow data, the Agency has been limited in its ability to identify and track actual recruitment efforts, as the data was unknown and/or unavailable. As a result, the Agency set out to develop an Agency-wide recruitment strategy, inclusive of routine data collection measures, to overcome this program deficiency. In late January 2016, HRSA hired a Diversity and Inclusion (D&I) Manager to lead and oversee such efforts among others. Through a series of communications, such as the Diversity and Inclusion Profile meetings with Bureau/Office leaders and meetings with Diversity and Inclusion Council and other EEO, Diversity and Inclusion, and HR stakeholders, the D&I Manager as well as other OCRDI and OHR leaders learned that Bureaus/Offices were executing individualized recruitment efforts and occasionally analyzing their efforts to determine whether their activities were yielding qualified candidates to fill their open positions. In light of this information, in FY 2017, the Agency hired a Data Analyst whose duties include assisting in developing a robust system to capture recruitment data and analyze the data to determine whether barriers to EEO exist. Initial discussions between key EEO and HR staff were held to determine whether existing databases could be modified to capture recruitment data as well as to identify the best approach to developing such a system in the event that the Agency's current human resources databases could not support recruitment data. In FY 2018, the Agency will continue discussions to determine the feasibility and usefulness of developing a recruitment tracking system. Progress made against the objective will be reported in the FY 2018 MD-715 Report.

EEOC FORM 715-01 PART I.1	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
Health Resources and Services Administration	FY 2017	
<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>As shown in the A1/B1 workforce tables, the following groups have participation rates that are lower than their respective 2010 Civilian Labor Force statistics: Males (in general); Hispanic males and females; White males and females; Native Hawaiian or other Pacific Islander males and females; American Indian or Alaska Native males and females; and males and females of two or more races.</p> <p>The percentage of persons with a targeted disability is below the 2% goal.</p> <p>Moreover, A6/B6 workforce tables indicate less than expected participation rates compared to the 2010 Relevant Civilian Labor Force statistics within at least one of the Agency's top three most populous mission critical occupations (0685, 0343, 2210) for all racial/ethnic and gender groups except Black males, Black females, and Asian females. The underrepresented groups include males (0685, 0343) and females (2210) in general; Hispanic males (0685, 0343) and females (2210); White males (all three series) and females (0343, 2210); Asian males (0343); Native Hawaiian or other Pacific Islander males (0685, 2210) and females (0685); American Indian or Alaska Native males and females (0685, 2210 for both genders); and males and females of two or more races (all three series for both genders).</p>	
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>In previous reporting cycles, the following data sources were used to conduct the barrier analysis: workforce data tables, complaint data, climate assessment survey, applicable policies and procedures, and reports. Information collected included the participation rates of EEO groups with CLF comparisons, EEO complaints, responses to the diversity and inclusion questions on the Employee Viewpoint Survey, Form 462 findings, and information taken from discussions with the Council on Employees with Disabilities.</p>	
<p>STATEMENT OF IDENTIFIED BARRIER:</p>	<p>A lack of centralized recruitment approaches and processes, which has limited the Agency's ability to conduct strategic outreach to qualified candidates from diverse backgrounds, was initially identified as the barrier. A series of activities have been</p>	

<p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier yielding the undesired condition.</p>	<p>undertaken to combat the barrier; yet the trigger remains the same. Therefore, HRSA plans to conduct an updated barrier analysis to identify whether the absence of a centralized recruitment strategy continues to be a barrier or if there's a new cause for the current participation rates.</p>
<p>OBJECTIVE:</p> <p>State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<ol style="list-style-type: none"> 1. Conduct barrier analysis on HRSA's existing recruitment/outreach strategies to determine whether they draw from all segments of society. 2. Assess the effectiveness of the Agency's current strategic partnerships in strengthening, diversifying, and increasing HRSA's pool of qualified candidates from underrepresented populations. 3. Assess the impact of implicit bias training on personnel decision making.
<p>RESPONSIBLE OFFICIAL:</p>	<p>Director, OCRDI Director, OHR Bureau/Office Leadership</p>
<p>DATE OBJECTIVE INITIATED:</p>	<p>Objective 1: 02/01/2017 Objective 2: 02/01/2017 Objective 3: 02/01/2017</p>
<p>TARGET DATE FOR COMPLETION OF OBJECTIVE:</p>	<p>Objective 1: 12/31/2019 Objective 2: 12/31/2019 Objective 3: 12/31/2019</p>

EEOC FORM 715-01 PART I.1	EEO Plan To Eliminate Identified Barrier	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (MUST BE SPECIFIC)	
Utilize the State of the Agency Briefing and Diversity and Inclusion Profile Meetings to inform key stakeholders of the current status of the Agency's workforce demographic profile and communicate the need to reevaluate the existing recruitment and selection processes for potential barriers to EEO.	04/30/2017 (Completed 9/30/2017)	
<p>Led by Special Emphasis Program Managers, develop barrier analysis plans in accordance with the stated objectives, to include an assessment of:</p> <ol style="list-style-type: none"> 1. Exit survey data to determine why employees are separating from the Agency and/or moving to other Bureaus/Offices within the Agency. 2. Pre-hire data to identify gaps in recruitment and potential barriers. 3. Applicant flow data to determine diversity among HRSA job applicants for mission critical occupations (MCOs). 4. The effectiveness of the Agency's current strategic partnerships in strengthening, diversifying, and increasing HRSA's pool of qualified candidates from underrepresented populations. 5. The impact of unconscious bias training on personnel decision making. 	06/30/2018	
Identify existing assessment tools and develop, as needed, other tools to effectively conduct barrier analysis.	06/30/2018	
Acquire plan approval from HRSA Administrator.	09/30/2018	
Establish barrier analysis teams consisting of Bureau/Office liaisons as well as ERG and Diversity and Inclusion Council points of contact to assist Special Emphasis Program Managers in conducting barrier analysis.	09/30/2018	
Train barrier analysis teams.	10/31/2018	
Execute the plan.	10/31/2018	
Utilize senior staff meetings and other outlets to keep leadership apprised of progress.	12/31/2019	
Discuss progress as a standing agenda item at ERG and Diversity and Inclusion Council Meetings, and the appropriate HR and EEO staff meetings.	12/31/2019	
Report findings and recommendations to the Diversity & Inclusion Council and the appropriate EEO program staff.	12/31/2019	
As reported in previous MD-715 reports, the Agency has noted less than expected representation among several historically underrepresented groups in the overall workforce as well as in the Agency's top two most populous mission critical occupations. The Agency has employed a series of strategies to eliminate identified barriers; however, underrepresentation remains. Therefore, in FY 2017, HRSA took the initial steps towards		

conducting barrier analysis to determine whether a barrier is causing less than expected participation rates among certain workforce segments. Specifically, the Agency:

- Trained key staff in barrier analysis
- Analyzed existing workforce data and uncovered triggers among the Agency's female, Hispanic, Asian, veteran, and disability workforces. Findings were presented to key stakeholders including but not limited to Employee Resource Groups, HRSA Diversity and Inclusion Council, and senior leaders.
- Devised a barrier analysis plan for Women's Employment, with additional plans that address the Hispanic, Veteran and disability employment programs being developed in FY 2018.

As the Agency is aware that the time needed to conduct a robust barrier analysis can vary, in FY 2017, the Agency performed other strategic activities in support of promoting diversity and inclusion in a discrimination-free work environment across the Agency. Chiefly, HRSA:

- Continued to promote a greater understanding and awareness of diverse cultures through the sponsorship and co-sponsorship of seven special emphasis observances. These activities targeted African Americans, Women, Asian Americans/Pacific Islanders, Hispanics, Veterans, and Persons with Disabilities.
- Provided unconscious bias training to HRSA staff to continue to demonstrate an understanding of how self-awareness and experience shape thought, personality, and decision making.
- Through the provision of reasonable accommodations and associated trainings, continued to make HRSA a more inclusive place to work for persons with disabilities.
- Provided relevant EEO trainings to HRSA staff regarding EEO compliance, anti-harassment, retaliation, and bullying to managerial and non-managerial staff.
- To improve retention rates, placed greater emphasis on improving the Agency's inclusion scores as gleaned from the results of the annual Federal Employee Viewpoint survey. The Agency's New Inclusion Quotient increased from 65.76% in FY 2016 to 71.78% in FY 2017, exceeding the OPM benchmark of 65%.
- To better understand what drives employee retention/attrition, piloted the newly revised HRSA exit survey to allow for a thorough assessment of HRSA's workforce climate and motivation for leaving a particular Bureau/Office or the Agency as perceived by off-boarding and transitioning employees. The survey will be fully implemented in FY 2018.
- Continued to utilize the DIP reports and meetings to engage leaders in proactive identification of barriers to EEO in recruitment and hiring, and assisting Bureaus/Offices with course correction planning.
- Engaged the HRSA Diversity and Inclusion Council in a series of working sessions to aid and enhance the integration and sustainability of diversity and inclusion practices and ideologies into the strategic mission and operations of HRSA.
- Increased the Agency's strategic partnerships with minority-serving institutions, with emphasis on Hispanic-serving institutions, to communicate the Agency's recruitment needs to groups who may have an interest in HRSA job opportunities.
- Utilized the HRSA Scholars Program to recruit and develop a diverse pool of highly motivated and talented individuals to fill entry level professional positions across HRSA's administrative and mission critical occupations.

Despite less than expected representation, most of the Agency's workforce populations—except for White males and females; Native Hawaiian or other Pacific Islander males and females; and males of two or more races—increased in representation since FY 2016. Males (in general) increased from 28.8% in FY 2016 to 29.02% in FY 2017; Hispanic males – 1.33% to 1.37%; Hispanic females – 2.83% to 3.17%; American Indian or Alaska Native males – 0.17% to 0.21%; American Indian or Alaska Native females – 0.44% to 0.48%; females of two or more races – 0% to 0.05%; and persons with a targeted disability – 1.33% to 1.43%. Moreover, in terms of participation rates within MCOs, of those groups with less than expected representation, increases were found among males in general (0343 – 26.57% to 28.33%); White males (0343 – 13.43% to 15.58%); Asian males (0343 – 1.19% to 1.42%); and females of two or more races (0685 – 0% to 0.14%). Persons with targeted disabilities have less than expected participation rates in 0685 and 2210 positions, although representation in the 0685 series increased from 1.19% in FY 2016 to 1.8% in FY 2017.

HRSA recognizes that its success in overcoming the longstanding issue of less than expected participation rates among key workforce demographic groups in the total workforce and in the top two most populous mission critical occupations is deeply rooted in its barrier analysis findings and the continuation of the above-mentioned Agency-wide activities. Therefore, HRSA will perform the key activities outlined in this plan and report outcomes in subsequent MD-715 reports as appropriate.

EEOC FORM 715-01 PART I.2	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
Health Resources and Services Administration	FY 2017	
<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>As indicated in the A4/B4 workforce tables, the participation rates of the following groups in senior level grades, GS-14 and -15, are disproportionate to their overall participation rates at HRSA: Black males and females; Hispanic males and females; American Indian or Alaska Native males and females; and persons with targeted disabilities. For SES: females (in general); Asian females; American Indian or Alaska Native males and females; Black males and females; and persons with targeted disabilities.</p> <p>Persons with targeted disabilities had a slight increase from (1.06% or 19) in FY2016 to (1.43% or 27) in FY2017. While this increase is small, it does show upward movement for this population.</p>	
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>The following data sources were used to conduct the barrier analysis: workforce data tables, complaint data, climate assessment survey, applicable policies and procedures, and reports. Information collected included workforce trends; EEO complaints; responses to the merit-based promotions question on the Employee Viewpoint Survey; Form 462 findings; and formal career-development program policies, procedures and applicant flow data.</p>	
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier yielding the undesired condition.</p>	<p>Previous barrier analysis findings have indicated that 1) HRSA's outreach and recruitment approaches do not increase diversity in the applicant pool, and 2) reviews of selection criteria, and overall process, for recruiting candidates for senior-level positions are not comprehensive enough to ensure that there is a diverse applicant pool. Progress has been made, yet the trigger remains. Therefore, the Agency will undertake a series of activities to determine whether a new barrier exists.</p>	
<p>OBJECTIVE:</p> <p>State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>Reassess the root causes of the stated triggers through the implementation of a robust barrier analysis plan.</p>	
<p>RESPONSIBLE OFFICIAL:</p>	<p>Director, OCRDI Director, OHR</p>	
<p>DATE OBJECTIVE INITIATED:</p>	<p>11/29/2010 (modified 1/08/2017)</p>	

TARGET DATE FOR COMPLETION OF OBJECTIVE:	12/31/2019
EEOC FORM 715-01 PART I.2	EEO Plan To Eliminate Identified Barrier
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (MUST BE SPECIFIC)
Disseminate information concerning job details, developmental assignments, hiring and promotion opportunities within the Agency to all employees.	09/30/2015 (completed on 9/30/2015; completed on 9/30/2016 for FY 2016; completed on 09/30/2017 for FY 2017)
Utilize senior staff meetings, executive officers meetings, Understanding Unconscious Bias training, ERG meetings, and Diversity and Inclusion Council meetings to continue to educate stakeholders on the Agency's senior-level profile, and communicate the need to reevaluate the pipeline to senior-level positions for potential barriers to EEO.	04/30/2017 (completed 9/30/2017)
Led by Special Emphasis Program Managers, develop a robust barrier analysis plan to reassess the root causes of less than expected participation rates in senior level positions, which includes: <ol style="list-style-type: none"> 1. An evaluation of HRSA's SES merit staffing/hiring processes to ensure the Agency is focused on attracting diverse candidate pools to achieve adequate representation. 2. Assessment of the Agency's feeder grades (GS14-15) and occupational series 0602, 2210, 1109, and 0685 for participation parity. 3. An in-depth review of the Agency's current recruitment practices and selection outcomes of senior leadership positions. 4. Review of applicant flow data for barriers concerning promotions and leadership development programs beginning at the GS-14 level. 5. Collection and analysis of data on the perceptions that employees in GS-13 level and above positions may have about opportunities for upward mobility. 6. An analysis of complaint data, climate surveys and exit interviews to determine if glass ceilings and blocked pipeline barriers exist within the Agency's senior level positions. 7. Examination of senior grade levels in each major occupation with upward mobility to determine whether any one group may encounter a blocked pipeline barrier in a specific occupation. 	06/30/2017 (completed on 9/30/2017 for Women's Employment Program)
Identify existing assessment tools and develop, as needed, other tools to effectively conduct barrier analysis.	06/30/2018
Inform HRSA leadership about the Agency's barrier analysis efforts.	09/30/2017 (completed 09/30/2017)
Implement barrier analysis plan.	10/31/2017

	(completed on 09/30/2017 for Women's Employment Program)
Disseminate information concerning job details, developmental assignments, hiring and promotion opportunities within the Agency to all employees.	09/30/2018
Utilize senior staff meetings, executive officers meetings, Understanding Unconscious Bias training, ERG meetings, and Diversity and Inclusion Council meetings to continue to educate stakeholders on the Agency's senior-level profile, and communicate the need to reevaluate the pipeline to senior-level positions for potential barriers to EEO.	09/30/2018
<p>Led by the Agency's Special Emphasis Program Managers and with a focus on Hispanics and persons with disabilities, develop robust barrier analysis plans to reassess the root causes of less than expected participation rates in senior level positions, which includes:</p> <ol style="list-style-type: none"> 1. An evaluation of HRSA's SES merit staffing/hiring processes to ensure the Agency is focused on attracting diverse candidate pools to achieve adequate representation. 2. Assessment of the Agency's feeder grades (GS14-15) and occupational series 0602, 2210, 1109, and 0685 for participation parity. 3. An in-depth review of the Agency's current recruitment practices and selection outcomes of senior leadership positions. 4. Review of applicant flow data for barriers concerning promotions and leadership development programs beginning at the GS-14 level. 5. Collection and analysis of data on the perceptions that employees in GS-13 level and above positions may have about opportunities for upward mobility. 6. An analysis of complaint data, climate surveys and exit interviews to determine if glass ceilings and blocked pipeline barriers exist within the Agency's senior level positions. <p>Examination of senior grade levels in each major occupation with upward mobility to determine whether any one group may encounter a blocked pipeline barrier in a specific occupation.</p>	09/30/2018
Identify existing assessment tools and develop, as needed, other tools to effectively conduct barrier analysis.	12/31/2018
Implement barrier analysis plans focusing on Hispanics and persons with disabilities.	01/02/2019
Inform HRSA leadership about the Agency's barrier analysis efforts.	12/31/2019
Report findings and recommendations to key stakeholders.	12/31/2019
REPORT OF ACCOMPLISHMENTS AND MODIFICATIONS TO OBJECTIVE	
<p>This reporting period was used to implement preliminary barrier analysis activities to ensure that the Agency conducts an efficient and effective barrier analysis. To this end, HRSA:</p> <ul style="list-style-type: none"> • Provided barrier analysis training to stakeholders inclusive of the Agency's EEO and HR personnel, employee resource group leaders as well as Diversity and Inclusion Council members. • Led by the Agency's Special Emphasis Program Managers, identified and communicated triggers to EEO as gleaned from the findings of the workforce analysis throughout the employment lifecycle. 	

- Developed and implemented a barrier analysis plan in support of the Federal Women's Program. Plans will be developed for persons with disabilities, Hispanics, and veterans in FY 2018.

Beyond preparing for the Agency's barrier analysis, HRSA has undertaken several strategies in support of increasing diversity within the Agency's senior-level positions. Below are a few noteworthy achievements.

- Continued to utilize the State of the Agency briefing with senior leadership as well as Diversity and Inclusion Profile reports and meetings with Bureau/Office leadership to increase awareness of senior-level workforce profiles across the Agency. This information was also made available on the OCRDI SharePoint page and updated quarterly.
- Reenergized the Mentoring Now Program with a focus on increasing participation rates among employees in senior-level positions. Participant data shows a decrease in the percentage of SES employees but an increase in non-SES managers and supervisors over the past fiscal year. 8.33% (2) of SES and 9.90% (31) of other managers and supervisors participated in the Mentoring Now Program in FY 2017, as opposed to 11.11% (3) of SES and 5.87% (20) of other managers and supervisors participating in FY 2016.
- Promoted participation in Bureau/Office-specific mentoring programs targeted at developing employees based upon occupational series.
- Through a coordinated effort among Special Emphasis Program managers and the executive officers, disseminated job and career development opportunities to employee resource groups as well as other targeted distribution lists of people who have expressed any interest in working at HRSA, as appropriate.
- As a best practice, OCRDI and OHR/HLI collaborated to ensure that all underrepresented populations are encouraged to participate in both formal and informal development programs. Additionally, all formal development programs were reviewed by OCRDI to identify barriers to equal participation. Applicant flow data findings were discussed with the appropriate program manager.
- Utilized the Agency's Understanding Unconscious Bias training to educate hiring officials on the senior-level profile and on how implicit biases can influence its enhancement.

MD-715 – Part J

Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plan for persons with disabilities (PWD) and those with targeted disabilities (PWTD), EEOC regulations (29 CFR 1614.203(e)) and MD-715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention during the entire life cycle of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

SECTION I: EFFORTS TO REACH REGULATORY GOALS

EEOC regulations (29 CFR 1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with reportable and targeted disabilities in the federal government.

1. **Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.**

- | | | |
|--------------------------------|-------|------|
| a. Cluster GS-1 to GS-10 (PWD) | Yes X | No 0 |
| b. Cluster GS-11 to SES (PWD) | Yes X | No 0 |

HRSA has triggers involving PWD in both grade clusters, as, in FY 2017, the percentage of PWD in the GS-1 to GS-10 cluster (10.87%) and in the GS-11 to SES cluster (1.45%) fell below the 12% benchmark.

** For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS -11 Step 1 in the Washington, DC metropolitan region.*

2. **Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.**

- | | | |
|---------------------------------|-------|------|
| a. Cluster GS-1 to GS-10 (PWTD) | Yes 0 | No X |
| b. Cluster GS-11 to SES (PWTD) | Yes X | No 0 |

In FY 2017, the percentage of PWTD in the GS-1 to GS-10 cluster (7.65%) exceeded the 2% benchmark; however, in the same reporting period, the percentage of PWTD in the GS-11 to SES cluster (1.43%) fell below the 2% benchmark which constitutes a trigger involving PWD in the GS-11 to SES grade level cluster.

3. **Describe how the agency has communicated the numerical goals to the hiring managers and/or recruiters.**

Numerical goals are communicated to hiring managers at Diversity and Inclusion Profile meetings with bureau/office leadership. These goals are also communicated at senior staff meetings, Diversity and Inclusion Council meetings, and Council on Employees with Disabilities formal meetings as well as during relevant trainings to include reasonable accommodations and unconscious bias trainings.

SECTION II: MODEL DISABILITY PROGRAM

Pursuant to the regulations implementing Section 501 of the Rehabilitation Act of 1973 (29 CFR §1614.203), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable

accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If “no”, describe the agency’s plan to improve the staffing for the upcoming year.

Yes X No 0

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2. Identify all agency staff responsible for implementing the agency’s disability employment program by the office, staff employment status, and point of contact.

Disability Program Task	Office/Division Responsible (EEO/ HR/ IT/ Facilities)	# of FTE Staff by Employment Status			Primary Point of Contact (Name, Title)
		Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTB	HR			1	Chris Parker
Answering questions from public about hiring authorities that take disability into account	EEO/HR			2	B. Winona Chestnut, Disability Employment Program Manager
Processing reasonable accommodation requests from applicants and employees with disabilities	EEO	1			Katie Slye-Griffin, Reasonable Accommodations Manager
Section 508 Compliance	EEO			1	Amy Gallicchio, Administrative Staff
Architectural Barriers Act Compliance	EEO	1			Katie Slye-Griffin, Reasonable Accommodations Manager
Special Emphasis Program for PWD and PWTB	EEO			1	B. Winona Chestnut, Disability Employment Program Manager

3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the training that disability program staff have received. If “no”, describe the training planned for the upcoming year.

Yes X No 0

- | |
|---|
| <ul style="list-style-type: none"> • ADA Midatlantic Conference (every staff member attended) • Barrier Analysis (2 staff members attended) • COR Training (1 staff member attended) • Disability Program Manager Training (1 staff member attended) • JAN (Job Accommodation Network) webinars • Sick Leave and Reasonable Accommodation (hosted by LRP) • Successfully Navigating Performance and Conduct Issues Under the Rehabilitation Act (hosted by LRP) • Training on the Interactive Process (hosted by LRP) |
|---|

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

1. *Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period?*

Yes X No 0

2. *Describe the steps that the agency has taken to ensure all aspects of the disability program have sufficient funding and other resources.*

HRSA has a central fund for RA services.

SECTION III: PLAN TO RECRUIT AND HIRE INDIVIDUALS WITH DISABILITIES

Pursuant to 29 CFR 1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency's recruitment program plan for PWD and PWTD, such as whether the agency has a numerical hiring goal, and whether the agency uses the Schedule A hiring authority or other hiring authorities that take disability into account, during this reporting period.

A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

1. *Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.*

HRSA has a Disability Employment Program Manager who also serves as the Agency's Selective Placement Program Coordinator. This position is primarily responsible for recruiting individuals with a disability. This is done through direct and indirect contact. Additionally, human resources personnel are available to consult with persons with disabilities at various career fairs.

2. *Pursuant to 29 C.F.R. 1614.203(a)(3), describe your agency's use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce.*

HRSA fully utilizes special hiring authorities to fill the Agency's open positions, and educates potential applicants on the process. Information can be obtained from 1) the Agency's website, 2) human resources personnel, and 3) the Selective Placement Program Coordinator.

3. *When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority and (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.*

The Agency accepts potential candidates who supply their Schedule A certificate and a letter of interest. The Agency's human resources personnel determines eligibility and notifies the Selective Placement Program Coordinator who will alert the hiring officials of eligibility.

4. *Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the agency's plan to provide the training.*

Yes 0 No X N/A 0

While the Agency has offered training on special hiring authorities, it is not mandatory for hiring officials to participate. In FY 2018, the Agency will determine whether it is feasible and necessary to have a mandatory training, as most hiring officials receive training (one-on-one or group) as appropriate.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

Describe the agency's efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

HRSA has a list-serve of disability serving institutions and utilizes that list-serve to communicate job opportunities. Each year, the Agency reaffirms its relationship with these institutions as well as establishes partnerships with others.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. **Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If “yes”, please describe the triggers below.**

- | | | |
|---|-------|------|
| a. New Hires for Permanent Workforce (PWD) | Yes X | No 0 |
| b. New Hires for Permanent Workforce (PWTD) | Yes 0 | No X |

Among the new hires in the permanent workforce, triggers exist for PWD (7.63%), which fall below the respective benchmark of 12% for PWD in FY 2017. However, HRSA hired 2.29% PWTD in FY 2017 which exceeds the 2% goal.

2. **Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.**

- | | | |
|-----------------------------|-------|------|
| a. New Hires for MCO (PWD) | Yes X | No 0 |
| b. New Hires for MCO (PWTD) | Yes X | No 0 |

Utilizing HRSA’s qualified applicant pool of 3.92% as the benchmark, the agency identified triggers for PWD and PWTD among new hires for mission-critical occupational series 0343. 10.87% PWD and 4.35% PWTD were hired for MCO series 0685; however, there were no hires for PWD or PWTD for MCO 0343.

3. **Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.**

- | | | |
|--|-------|------|
| a. Qualified Applicants for MCO (PWD) | Yes X | No 0 |
| b. Qualified Applicants for MCO (PWTD) | Yes X | No 0 |

Utilizing HRSA’s relevant applicant pool of 4.58% as the benchmark, the agency identified triggers for PWD and PWTD among qualified internal applicants for mission-critical occupational series 0685 and 0343. The qualified internal applicant rate for MCO series 0343 was 4.46% PWD and 1.91% PWTD. The qualified internal applicant rate for MCO series 0685 was 4.10% PWD and 0.41% PWTD.

4. **Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations? If “yes”, please describe the triggers below.**

- | | | |
|------------------------------|-------|------|
| a. Promotions for MCO (PWD) | Yes X | No 0 |
| b. Promotions for MCO (PWTD) | Yes X | No 0 |

Utilizing HRSA's qualified applicant pool of 3.92% as the benchmark, the agency identified triggers for PWD and PWTD among employees promoted to mission-critical occupations in FY2017. There were no promotions among PWD and PWTD in MCO series 0685 in FY2017. However, 8.70% PWD and 0% PWTD were hired for MCO series 0343.

SECTION IV: PLAN TO ENSURE ADVANCEMENT OPPORTUNITIES FOR EMPLOYEES WITH DISABILITIES

29 C.F.R §1614.203(d)(1)(iii) requires agencies to provide sufficient opportunities for employees with disabilities to advance within the agency. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, and similar programs that address hiring and advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

A. ADVANCEMENT PROGRAM PLAN

Describe the agency's plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

To ensure PWD have sufficient opportunities for advancement, HRSA:

- Fosters strategic partnerships among HLI and the Agency's Disability Employment Program Manager to assess the applicant flow data associated with the Agency's career development programs and provide recommendations for improving participation rates among PWD as necessary.
- Communicates advancement opportunities to the Agency's Council on Employees with Disabilities to ensure broad dissemination.
- Posts detail opportunities on the Agency's SharePoint for easy access among PWD.

B. CAREER DEVELOPMENT OPPORTUNITIES

1. Please describe the career development opportunities that the agency provides to its employees.

HRSA offered three formal career development programs in FY 2017: Mid-Level Development Program (MLDP), Administrative Professionals Career Enhancement Program (APCEP), and Mentoring Now Program.

MLDP is a capacity-building initiative targeting HRSA employees at the GS-12 and GS-13 levels who have expressed an interest in leadership development and have a desire to become part of a pool of highly skilled and qualified employees who can be called upon to step into leadership roles as needs arise. Graduates of the Program increase their knowledge and skills in leadership, gain interdepartmental project experience, have exposure to HRSA leaders, and gain an increased understanding of HRSA's mission, challenges, and opportunities. As the largest population of employees at HRSA, developing leaders at this level is crucial to HRSA's future success as an Agency.

The APCEP is a structured framework that employees who are in administrative roles/functions may use in developing and enhancing their current job performance as well as providing guidance for a long-term career path in the administrative profession or an alternative career path. The Program aims to help employees in administrative roles/functions enhance their skills necessary to be successful in their current position while promoting career growth and development.

The Mentoring Now Program is an OPDIV-wide mentoring program that creates a culture of knowledge-sharing with colleagues and prepares future leaders. The program serves to motivate, develop and retain talent by providing comprehensive mentoring on professional development and career advancement to the mentees.

Other formal career development opportunities include the HRSA Coaching Program and Senior Leader Fellowship Program (SLFP). The SLFP is designed to ensure HRSA leaders are among the best in the Federal Government. Participants experience a broad spectrum of development opportunities based on best practices of renowned leadership programs in the public and private sector. The program includes: self-reflection, industry and federal speakers, networking, outside study and activities, executive coaching, and engaging discussion focused on the OPM Executive Core Qualifications (ECQs) and HRSA leadership competencies.

The HRSA Coaching Program was created to support HRSA leaders in career development by helping them enhance their effectiveness, leverage their strengths, augment their organizational commitment and retention, and encourage them to pursue bigger goals. The Program supports leaders in navigating the complex challenges of managing organizations/programs, people, and their careers. Through a professional partnership with a certified coach, leaders have the opportunity to gain fresh perspectives on personal challenges and opportunities, enhance their thinking and problem-solving skills, and boost their personal effectiveness and confidence in carrying out their chosen work and life roles.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate.

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	N/A					
Fellowship Programs	N/A					
Mentoring Programs	134	134	16.42%	16.42%	0.75%	0.75%
Coaching Programs	N/A	41	4.88%	4.88%	2.44%	2.44%
Training Programs	N/A					
Detail Programs	N/A					
Other Career Development Programs	98	50	8.16%	16.00%	1.02%	2.00%

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

- a. Qualified Applicants (PWD) Yes 0 No X
- b. Selections (PWD) Yes 0 No X

4. Do triggers exist for **PWTD** among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

- | | | |
|--------------------------------|-------|------|
| a. Qualified Applicants (PWTB) | Yes 0 | No X |
| b. Selections (PWTD) | Yes 0 | No X |

C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

- | | | |
|---|-------|------|
| a. Awards, Bonuses, & Incentives (PWD) | Yes X | No 0 |
| b. Awards, Bonuses, & Incentives (PWTD) | Yes X | No 0 |

Utilizing HRSA’s inclusion rate of 7.93% as the benchmark, the Agency identified triggers involving the percentage of PWD and PWTD who received Time Off and Cash Awards in FY2017. PWD received 5.24% in Time Off Awards of less than 9 hours and 7.39% in Time Off Awards of 9 or more hours. PWD received 8.32% in Cash awards of \$500 or less; however, in Cash awards of \$500 or more, PWD received 6.81%. Further, PWTD received 1.05% in Time Off Awards of less than 9 hours and 1.14% in Time Off Awards of 9 or more hours. Lastly, PWTD received 2.77% in Cash Awards of \$500 or less and 0.85% in Cash Awards of \$500 or more.

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If “yes”, please describe the trigger(s) in the text box.

- | | | |
|-------------------------|-------|------|
| a. Pay Increases (PWD) | Yes X | No 0 |
| b. Pay Increases (PWTD) | Yes X | No 0 |

Utilizing HRSA’s inclusion rate of 7.93% as the benchmark, the agency identified a trigger involving the percentage of PWD (4.91%) and PWTD (0.61%) who received a Quality Step Increase (QSI) in FY2017.

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.

- | | | |
|--------------------------------------|-------|------|
| a. Other Types of Recognition (PWD) | Yes 0 | No 0 |
| b. Other Types of Recognition (PWTD) | Yes 0 | No 0 |

N/A

D. PROMOTIONS

1. **Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.**

a. SES

i. Qualified Internal Applicants (PWD)	Yes 0	No 0	<u>N/A</u>
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ii. Internal Selections (PWD)	Yes 0	No 0	<u>N/A</u>
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b. Grade GS-15

i. Qualified Internal Applicants (PWD)	Yes X	No 0	
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ii. Internal Selections (PWD)	Yes X	No 0	
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c. Grade GS-14

i. Qualified Internal Applicants (PWD)	Yes X	No 0	
--	-------	------	--

ii. Internal Selections (PWD)	Yes X	No 0	
-------------------------------	-------	------	--

d. Grade GS-13

i. Qualified Internal Applicants (PWD)	Yes X	No 0	
--	-------	------	--

ii. Internal Selections (PWD)	Yes X	No 0	
-------------------------------	-------	------	--

Utilizing the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees as the benchmark (5.93%), HRSA identified triggers among PWD for qualified internal applicants and selectees for promotions to the senior grade levels GS-13 through GS-15. There were no vacancies for SES positions. The GS-15 level had 3.57% PWD among the qualified internal applicants with 0% internal selections. The GS-14 level had 4.14% PWD among the qualified internal applicants with 0% internal selections made, and the GS-13 level had 0% PWD qualified internal applicants and 0% internal selections.

2. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

a. SES		
i. Qualified Internal Applicants (PWTD)	Yes X	No 0
ii. Internal Selections (PWTD)	Yes X	No 0
b. Grade GS-15		
i. Qualified Internal Applicants (PWTD)	Yes X	No 0
ii. Internal Selections (PWTD)	Yes X	No 0
c. Grade GS-14		
i. Qualified Internal Applicants (PWTD)	Yes X	No 0
ii. Internal Selections (PWTD)	Yes X	No 0
d. Grade GS-13		
i. Qualified Internal Applicants (PWTD)	Yes X	No 0
ii. Internal Selections (PWTD)	Yes X	No 0

Utilizing the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees as the benchmark (5.93%), HRSA identified triggers among PWTD for qualified internal applicants and selectees for promotions to the senior grade levels GS-13 through GS-15. There were no vacancies for SES positions. The GS-15 level had 0% PWTD among the qualified internal applicants with 0% internal selections. The GS-14 level had 0.59% PWTD among the qualified internal applicants with 0% internal selections made, and the GS-13 level had 0% PWTD qualified internal applicants and 0% internal selections.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

a. New Hires to SES (PWD)	Yes 0	No 0	<u>N/A</u>
b. New Hires to GS-15 (PWD)	Yes 0	No X	
c. New Hires to GS-14 (PWD)	Yes X	No 0	
d. New Hires to GS-13 (PWD)	Yes X	No 0	

Utilizing the qualified applicant pool (3.92%) as a benchmark, HRSA identified triggers involving PWD. There were no new hires for the SES pool in FY2017. However, new hires amongst PWD in FY2017 consisted of: (3.57%) GS-13; (0%) GS-14; and (6.67%) GS-15.

4. **Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.**

a. New Hires to SES (PWTD)	Yes X	No 0
b. New Hires to GS-15 (PWTD)	Yes X	No 0
c. New Hires to GS-14 (PWTD)	Yes X	No 0
d. New Hires to GS-13 (PWTD)	Yes X	No 0

Utilizing the qualified applicant pool (3.92%) as a benchmark, HRSA identified triggers involving PTWD among the new hires for GS-13 through GS-15 senior grade levels, and there were no SES vacancies in FY2017. Additionally, PWTD were not hired for senior grade levels GS-12 through GS-15 in FY2017.

5. **Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.**

a. Executives			
i. Qualified Internal Applicants (PWD)	Yes X	No 0	
ii. Internal Selections (PWD)	Yes X	No 0	
b. Managers			
i. Qualified Internal Applicants (PWD)	Yes	No 0	<u>N/A</u>
ii. Internal Selections (PWD)	Yes	No 0	<u>N/A</u>
c. Supervisors			
i. Qualified Internal Applicants (PWD)	Yes X	No 0	
ii. Internal Selections (PWD)	Yes X	No 0	

Utilizing the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees as the benchmark (7.57%), HRSA identified triggers involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions in FY2017. 7.69% PWD were qualified internal applicants for Executive positions; however, 0 selections among PWD were made. 2.52% PWD were qualified internal applicants for Supervisory positions; however, 0 selections among PWD were made in FY2017.

6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

a. Executives

i. Qualified Internal Applicants (PWTD)	Yes X	No 0
ii. Internal Selections (PWTD)	Yes X	No 0

b. Managers

i. Qualified Internal Applicants (PWTD)	Yes	No 0	<u>N/A</u>
ii. Internal Selections (PWTD)	Yes	No 0	<u>N/A</u>

c. Supervisors

i. Qualified Internal Applicants (PWTD)	Yes X	No 0
ii. Internal Selections (PWTD)	Yes X	No 0

Utilizing the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees as the benchmark (7.57%), HRSA identified triggers involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions in FY2017. PWTD were not among the qualified internal applicants for Executive positions in FY2017. Additionally, 0.72% PWTD were among the qualified internal applicants for Supervisory positions; however, 0 selections among PWTD were made in FY2017.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box.

a. New Hires for Executives (PWD)	Yes X	No 0	
b. New Hires for Managers (PWD)	Yes 0	No 0	<u>N/A</u>
c. New Hires for Supervisors (PWD)	Yes 0	No X	

Utilizing the qualified applicant pool (3.92%) as a benchmark, HRSA identified triggers involving PWD among selectees for new hires to supervisory positions in FY2017. PWD were not selected for executive positions; however, 5.00% PWD were selected for supervisory positions in FY2017.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box.

e. New Hires for Executives (PWTD)	Yes X	No 0	
f. New Hires for Managers (PWTD)	Yes 0	No 0	<u>N/A</u>
g. New Hires for Supervisors (PWTD)	Yes X	No 0	

Utilizing the qualified applicant pool (3.92%) as a benchmark, HRSA identified triggers involving PWTD among selectees for new hires to supervisory positions in FY2017. PWTD were not selected for executive or supervisory positions in FY2017.

SECTION V: PLAN TO IMPROVE RETENTION OF PERSONS WITH DISABILITIES

To be a model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In the sections below, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace personal assistance services.

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. *In this reporting period, did the agency fail to convert all of the eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 CFR 213.3102(u)(6)(i))? If "yes", please explain why the agency did not convert all eligible Schedule A employees.*

Yes 0 No X N/A 0

2. *Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If "yes", describe the trigger below.*

a. Voluntary Separations (PWD)	Yes 0	No X
b. Involuntary Separations (PWD)	Yes 0	No X

3. *Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If "yes", describe the trigger below.*

a. Voluntary Separations (PWTD)	Yes 0	No X
b. Involuntary Separations (PWTD)	Yes 0	No X

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using the exit interview results and other data sources.

No trigger exists involving the separation rates of PWD and PWTD in FY2017.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 1614.203(d)(4), federal agencies are required to inform job applicants and employees of their accessibility rights under Section 508 of the Rehabilitation Act and the Architectural Barriers Act, and explain how to file complaints under those laws. In addition, agencies are also required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act of 1973, including a description of how to file a complaint.

<https://www.hrsa.gov/about/508-resources.html>

2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under the Architectural Barriers Act of 1968, including a description of how to file a complaint.

HRSA resides in a privately owned building which is governed by ADA. Accordingly, no ABA notice is posted on either website.

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

In FY 2017, HRSA adopted the HHS 508 Policy to ensure compliance with both Federal and HHS requirements, and continues to:

- Refine informational materials for HRSA's Accessibility Program generally and for RA and 508-compliance specifically.
- Provide technical assistance to HRSA Bureaus and Offices to ensure equal access for persons with disabilities.
- Strengthen working relationships among OCRDI, Office of Information Technology and the Office of Acquisitions Management and Policy to better project and address the needs of persons with disabilities and 508-compliance.
- Track Section 508 complaints and work to provide immediate, alternative options in circumstances where a system is not fully accessible.
- Include Section 508 requirements in its RA Training for Managers and Supervisors, RA Training for Employees, and New Employee Orientation.

C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 CFR 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

- 1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpretive services.)**

HRSA processed a total of 271 cases in FY 2017. 61.3% of HRSA's RA cases were decided within Agency timelines. HRSA approved 73.0% of the requests and, of those, 71.7% were provided within Agency timelines. On average, cases moved from request to provision of an approved RA in 35.8 days.

- 2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring the requests for trends.**

HRSA has reported a program deficiency related to timely processing of RA requests since the FY 2014 MD-715 report. Since that time, HRSA has diligently worked to improve its RA process; provide RA training to employees, managers, and supervisors; train the Accessibility Specialists who process cases; develop and rollout an RA Processing and Tracking System; and rewrite the RA policy and procedures to improve the effectiveness of the process. HRSA's RA caseload has continued to rise during this same period (150 cases in FY 2014 and 271 cases in FY 2017), and HRSA began providing EEO services (including RA processing) to AHRQ in FY 2017. Even so, HRSA has effectively managed the caseload, focusing on accommodation solution effectiveness during the interactive process. Multiple employees have commented that their accommodations have improved their work environments and allowed them to engage successfully in their work. While timeliness remains a critical goal for the program, the fact that the elements of the program are now solidified indicates that HRSA should be able to continue improving processing times in FY 2018.

D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

Pursuant to 29 C.F.R. 1614.203 (d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests, timely providing approved personal assistance services, conducting training for managers and supervisors, and monitoring the requests for trends.

Per the Agency's RA Policy and Procedures Manual (approved by the EEOC in September 2017), PAS is processed using the same methods as reasonable accommodations. The policy states:

"...employees requesting PAS will work with the Accessibility Specialist so that the Agency can conduct an individual assessment of the employee's needs. HRSA may only deny a request for PAS if the difficulty or cost of providing the service would be an undue hardship. The process of determining whether providing personal assistance services is an undue hardship is the same as the process the agency uses to determine whether a reasonable accommodation poses an undue hardship. For this and other reasons (e.g., confidentiality, tracking timeliness of responses), requests for PAS will be centrally recorded in the Agency's system of records for RA. It is important to note that under Section 501 of The Rehabilitation Act of 1973, HRSA is prohibited from taking adverse actions against job applicants or employees based on their need for PAS, either perceived or real."

In regards to training, HRSA's RA Training for Managers/Supervisors and the subsequent course, RA Refresher for Managers/Supervisors, review the similarities and differences between PAS and other service types (sign language interpreting, readers, escorts, etc.), as well as the process used to make a request for such services. To date, this training has been well received.

HRSA does have an employee who currently receives PAS services. No problems have been reported to date and management has expressed support for the program. However, data is limited; accordingly, HRSA will report on the effectiveness of its process in the FY2018 reporting cycle.

SECTION VI: EEO COMPLAINT AND FINDINGS DATA

A. EEO COMPLAINT DATA INVOLVING THE FAILURE TO ACCOMMODATE

1. ***Did failure to accommodate fall within the top three issues alleged in the agency's EEO counseling activity during the last fiscal year?***

Yes X No 0 N/A 0

2. ***Did failure to accommodate fall within the top three issues alleged in the agency's formal complaints during the last fiscal year?***

Yes X No 0 N/A 0

3. ***In cases alleging the failure to provide reasonable accommodation, did any result in a finding against the agency or a settlement agreement during the last fiscal year?***

Yes X No 0 N/A 0

4. ***If the agency had one or more findings of discrimination involving the failure to provide an accommodation during the last fiscal year, please describe the corrective measures taken by the agency.***

The Agency had one partial finding of discrimination for failure to accommodate, in which the following corrective measures were taken as ordered:

1. Posted the Notice of Discrimination at the HRSA Headquarters.
2. Conducted EEO training for supervisors who were found to have failed to provide the Complainant with reasonable accommodation.
3. Restored Complainant's telework privileges as part of reasonable accommodation.
4. Complainant notified of right to seek compensatory damages.

B. EEO COMPLAINT DATA INVOLVING DISCRIMINATION BASED ON DISABILITY STATUS (EXCLUDING FAILURE TO ACCOMMODATE)

1. *Did disability status fall within the top three bases alleged in the agency's EEO counseling activity during the last fiscal year?*

Yes X No 0 N/A 0

2. *Did disability status fall within the top three bases alleged in the agency's formal complaints during the last fiscal year?*

Yes X No 0 N/A 0

3. *In cases alleging discrimination based on disability status, did any result in a finding against the agency or a settlement agreement during the last fiscal year?*

Yes X No 0 N/A 0

4. *If the agency had one or more findings of discrimination based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.*

The Agency did not have any findings of discrimination based on disability status during the last fiscal year; however, the Agency did have settlement agreements.

SECTION VII: IDENTIFICATION AND REMOVAL OF BARRIERS

Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.

1. *Has the agency identified any barriers (policies, procedures, and/or practices) that affect the employment opportunities of PWD and/or PWTD?*

Yes X No 0

2. *Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?*

Yes X No 0 N/A 0

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments.

Trigger 1	Employees who utilize assistive technology (AT) came forward to the Disability Program Manager stating that they could not fully utilize or access online systems. These systems include SharePoint, an automated email subscription form, and the Electronic Handbooks' (EHB) grants management system that is controlled by HHS. Further investigation confirmed that these systems were not 508-compliant and did prevent these employees from full access to the resources required to successfully complete the essential duties of their positions.
Barrier(s)	Although the need for 508-compliance is generally understood throughout the Agency, some internal systems are not 508-compliant. These systems create the greatest barrier to Agency employees who use AT.
Objective(s)	1. To analyze all internal electronic and information technology (EIT) to identify non-compliant internal systems. 2. To strategically bring all internal systems and EIT into compliance with 508 regulations.
Responsible Official(s)	Director, OCRDI Director, OIT

Trigger 1	Employees who utilize assistive technology (AT) came forward to the Disability Program Manager stating that they could not fully utilize or access online systems. These systems include SharePoint, an automated email subscription form, and the Electronic Handbooks' (EHB) grants management system that is controlled by HHS. Further investigation confirmed that these systems were not 508-compliant and did prevent these employees from full access to the resources required to successfully complete the essential duties of their positions.			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2017 (Ongoing)	Analyze all of the Agency's internal systems and electronic and information technology (EIT) for 508-compliance.	Yes	9/30/2018	
09/30/2017 (Ongoing)	Create a plan to strategically remedy non-compliance in identified systems and issue areas.	Yes	9/30/2018	
09/30/2017 (Ongoing)	Obtain final approval of the Agency's 508-Compliance Policy.	Yes	9/30/2018	
09/30/2017 (Ongoing)	Implement the plan and make modifications as necessary to bring systems and issue areas into compliance.	No	9/30/2018	
09/30/2017 (Ongoing)	Provide training on 508-compliance solutions to impacted users and OIT support staff.	Yes	9/30/2018	
Fiscal Year	Accomplishments			
2017	<p>HRSA continues to make progress in its efforts to ensure that all internal and external information and communication technology (ICT) is fully compliant with section 508 of the Rehabilitation Act of 1973. In FY 2017, specific activities included:</p> <ul style="list-style-type: none"> • HRSA adopted the HHS 508 Policy during FY 2017 to ensure compliance with both Federal and HHS requirements. • OCRDI includes Section 508 requirements in its RA Training for Managers and Supervisors, RA Training for Employees, and New Employee Orientation. <p>HRSA's 508 Team in OIT and OCRDI track Section 508 complaints and work to provide immediate, alternative options in circumstances where a system is not fully accessible.</p>			

4. If the planned activities were not timely completed, did the agency hold the responsible official accountable in the performance rating period? If "yes", please describe the actions taken below.

Yes X No 0 N/A 0

The responsible officials were held accountable for all actions which were within their control. In circumstances requiring review or other action by outside parties that resulted in delay, responsible officials were not penalized.

5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

Due to the efforts listed above, HRSA's 508 team has seen improvements in a number of areas including general awareness of 508, inclusion of 508 in Statements of Work (SOWs) for new contracts agency-wide, and compliance of HRSA's internal systems. Compliance efforts will continue into FY 2018 and sustained improvement is expected.

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

HRSA continues to make progress in its efforts to ensure that all internal and external information and communication technology (ICT) is fully compliant with section 508 of the Rehabilitation Act of 1973. HRSA will continue to educate staff about 508 requirements and the importance of ensuring that technology is accessible.

BARRIER 2

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments.

Trigger 2	Employees with disabilities are underrepresented in hiring, awards, and promotions yet overrepresented in separations. Additionally, disability is the primary basis of EEO complaints.			
Barrier(s)	When viewed as whole, HRSA's workforce data findings continue to highlight challenges associated with the hiring or retention of persons with a disability. In specific, stigmas associated with persons with a disability, held by some management officials, impede the Agency's ability to achieve the objectives of the Rehabilitation Act and Executive Order 13548. However, robust barrier analysis must be undertaken to determine the underpinning of the stated trigger.			
Objective(s)	To assess the Agency's disability employment program against the employment lifecycle to determine whether barriers exist to EEO, and develop a plan to eliminate identified barriers.			
Responsible Official(s)	Director, OCRDI Director, OHR HRSA Senior Leadership			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
02/28/2017	Appoint a Special Emphasis Program Manager to manage the Agency's Disability Program portfolio.	Yes		2/28/2017
06/30/2017	Present Diversity and Inclusion Policy statement to the newly appointed HRSA Administrator.	Yes	11/30/2017	11/30/2017
07/31/2017	Formalize the Agency's disability program as required by regulation 29 C.F.R. 1614.102(b)(4).	Yes		7/31/2017
08/30/2017	Led by the Disability Employment Program Manager, establish a barrier-analysis assessment team with engagement from the Council on	Yes	05/31/2018	

Trigger 2	Employees with disabilities are underrepresented in hiring, awards, and promotions yet overrepresented in separations. Additionally, disability is the primary basis of EEO complaints.			
	[continued from paragraph on previous page] Employees with Disabilities, the Office of Human Resources and the Office of Planning, Analysis and Evaluation.			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
11/30/2017	Develop a robust barrier analysis plan to assess disability employment and determine whether barriers to EEO exist.	Yes	06/30/2018	
01/31/2018	Implement the plan with support from HRSA's Diversity & Inclusion Council and Council on Employees with Disabilities.	Yes	07/01/2018	
09/30/2018	Utilize HRSA's "Understanding Unconscious Bias" training, "EEO Compliance Training for Managers and Supervisors," and "RA Training for Managers and Supervisors" to address both attitudinal barriers and management's responsibility for employment actions which negatively impact persons with disabilities.	Yes		9/30/2017
Fiscal Year	Accomplishments			
2017	<p>Throughout the reporting period, the Agency employed a series of strategic activities that were designed to enhance disability employment across the Agency. The Agency began performing its initial steps towards assessing disability employment for barriers to EEO. Chief among them were:</p> <ul style="list-style-type: none"> • Appointing a Special Emphasis Program Manager to manage the Agency's Disability Program portfolio. • Forging an interagency partnership between the Disability Program Manager and the Council on Employees with Disabilities, HRSA's employee resource group dedicated to improving the employment lifecycle of persons with disabilities. • Providing EEOC-led barrier analysis training to essential partners in the pending barrier analysis process. • Hosting a Diversity in 30 Briefing session to educate HRSA employees on the status of disability employment at HRSA and the need for the Agency to conduct a robust barrier analysis in FY 2018. • Initiating preliminary discussions with key internal stakeholders (Council on Employees with Disabilities, Office of Civil Rights, Diversity and Inclusion, and the Office of Planning, Analysis and Evaluation) on the approach to conducting barrier analysis on the disability workforce. 			

Trigger 2	Employees with disabilities are underrepresented in hiring, awards, and promotions yet overrepresented in separations. Additionally, disability is the primary basis of EEO complaints.
	<p>[FY 2017 Accomplishments continued]</p> <p>With the conclusion of these abovementioned preliminary actions in support of barrier analysis, the Agency seeks to continue its efforts in FY 2018 by developing a multi-year disability employment program barrier analysis plan. Plan implementation is forecasted for late FY 2018, and progress will be reported in subsequent MD-715 annual reports as appropriate.</p> <p>Furthermore, although HRSA is preparing to conduct barrier analysis, the Agency recognizes the importance of maintaining an effective disability employment program. To that end, the Agency performed additional activities aligned with the core purpose of the Disability Employment Program. These activities included but were not limited to:</p> <ul style="list-style-type: none"> • Through Diversity & Inclusion Profile (DIP) reports and meetings, informed agency leaders of their disability employment profile and encouraged the development of remediation plans to address less than expected participation rates among employees with disabilities throughout the employment lifecycle. • Strengthened the Agency's RA program to support hiring and retention of persons with disabilities. • Utilized the National Disability Employment Awareness Month to highlight the importance of workplace inclusion. • Continued to educate managers and supervisors on the impact unconscious biases have on personnel decision making. • Provided RA training (including RA refresher courses) to the Agency's managers and supervisors. • Provided unconscious bias training RA trainings for non-supervisors. • Provided training on how to work with sign language interpreters. • Worked with employees who have disabilities, as well as their managers, supervisors, and colleagues, on an ad-hoc basis to resolve questions and issues that rise outside of the RA process. • Individually counselled managers and supervisors on the RA process, RMO responsibilities, and employee rights. <p>The Agency strongly believes that, through a combination of continued best practices and barrier identification and elimination, the Agency will successfully and strategically enhance the employment lifecycle of persons with disabilities by ensuring that no barriers to EEO exist.</p>

4. If the planned activities were not timely completed, did the agency hold the responsible official accountable in the performance rating period? If "yes", please describe the actions taken below.

Yes No N/A

The responsible officials were held accountable for all actions within their control. In circumstances requiring review or other action by outside parties that resulted in delay, responsible officials were not penalized.

5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

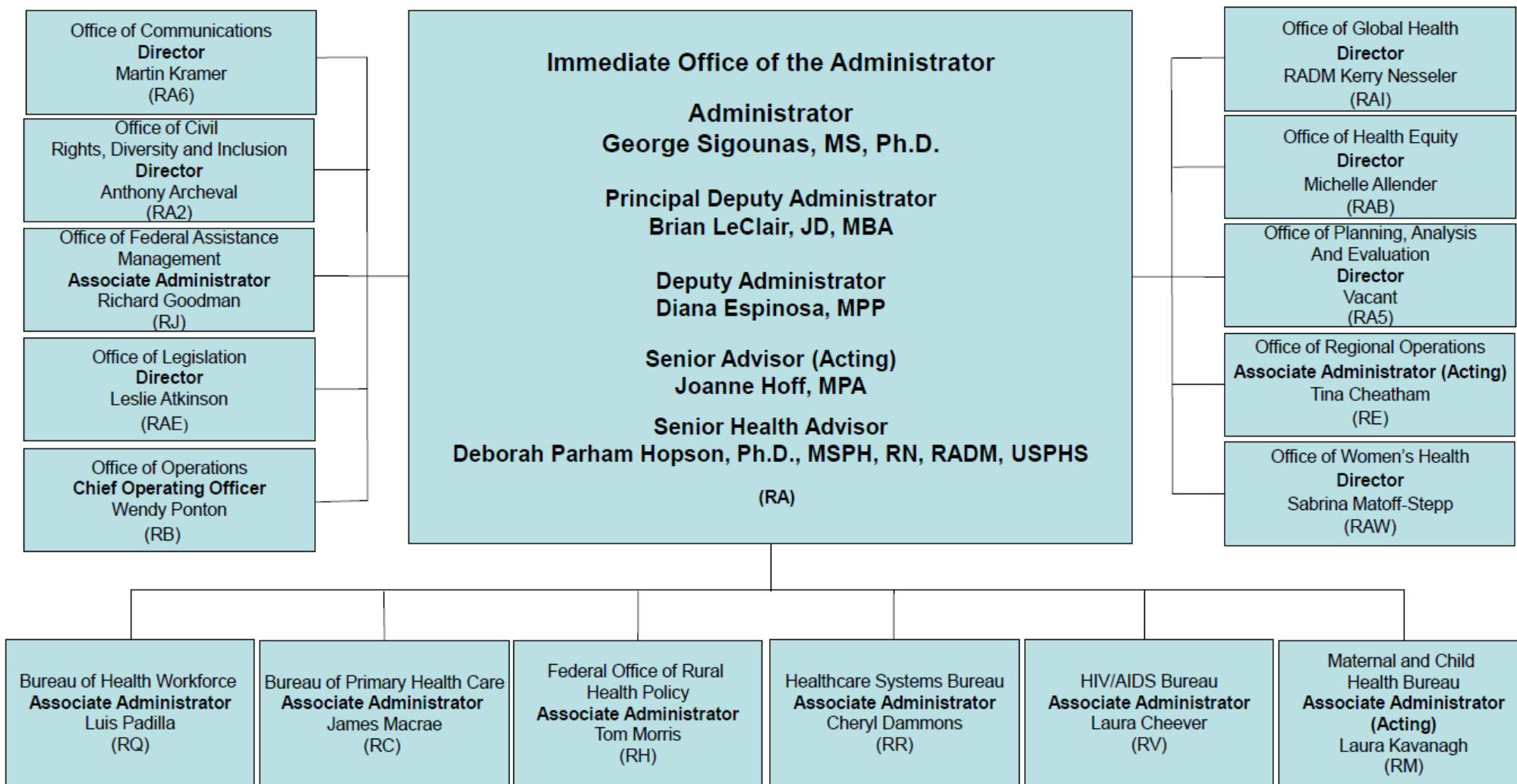
Through the above listed activities and others, the percentage of permanent and temporary civilian employees with a disability at HRSA rose from 9.19% (174) in FY 2016 to 9.23% (180) in FY 2017. Those with a targeted disability increased from 1.32% (25) in FY 2016 to 1.69% (33) in FY 2017.

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

Despite the described improvements in disability employment, data findings continue to indicate that persons with disabilities, including those with targeted disabilities, are employed, trained, promoted and awarded at less than expected rates. Therefore, the Agency will reassess its efforts to improve parity within the employment lifecycle of those with disabilities by conducting a robust barrier analysis to determine the root causes of such less than expected rates. The Agency will not only assess policies and procedures to determine whether barriers to enhanced disability employment exist, but will also assess practices, including those that may be driven by unfavorable perceptions associated with persons with a disability in the workforce, to determine whether they are undesirably impacting disability employment.

Health Resources and Services Administration

4/18/2018



APPENDIX B: HRSA EEO AND ANTI-HARASSMENT POLICY STATEMENTS



DEPARTMENT OF HEALTH & HUMAN SERVICES

Health Resources and Services
Administration

Rockville MD 20857

HEALTH RESOURCES AND SERVICES ADMINISTRATION (HRSA) POLICY STATEMENTS ON EQUAL EMPLOYMENT OPPORTUNITY (EEO) AND PROHIBITED DISCRIMINATION AND ANTI-HARASSMENT

HRSA EEO and Prohibited Discrimination Policy

As HRSA strives to improve community health and achieve health equity, HRSA will continue to foster a work environment free from unlawful discrimination. HRSA will not tolerate employment discrimination on the bases of race, color, religion, national origin, sex, pregnancy, gender identity, sexual orientation, age, disability (physical or mental), genetic information, or retaliation for opposing discriminatory practices or participating in the discrimination complaint process. This applies to all terms and conditions of employment, including recruitment, hiring, promotions, transfers, reassignments, training, career development, benefits, and separation. In addition, HRSA will provide reasonable accommodation to qualified individuals with disabilities and accommodations for religious practices in accordance with applicable laws and procedures.

HRSA's Office of Civil Rights, Diversity and Inclusion (OCRDI) is responsible for administering an impartial and effective [complaints management process](#) to address and resolve complaints of employment discrimination at the earliest possible stage. Employees may report allegations of discrimination to OCRDI at 5600 Fishers Lane, 14N152, Rockville, MD or (301) 443-5636. The regulations governing the Federal Equal Employment Opportunity (EEO) complaint process are found in Title 29 of the Code of Federal Regulations (C.F.R.) Part 1614. Employees seeking redress under this process must contact an EEO counselor in person, by phone, by email, or in writing within *45 calendar days* of the date of the alleged incident, or they may raise discrimination issues through the [Administrative or Negotiated Grievance Procedures](#), as appropriate. Employees may also report allegations to their immediate supervisor or a management official in their chain of command. While a discrimination allegation may be raised through these additional avenues, it does not constitute initiation of an EEO complaint with an EEO Counselor through the Federal sector EEO complaint process, and it does not extend the 45-day time limit to initiate an EEO complaint with OCRDI. Managers and supervisors will be held accountable for achieving HRSA's adherence to this policy.

While political affiliation, status as a parent, marital status, military service or any other non-merit based factors are not listed as protected bases under Title VII of the Civil Rights Act of 1964, discrimination on these bases is covered under HHS policy and strictly prohibited by HRSA. If a complaint is filed under one of the aforementioned bases, the DHHS EEO Office will issue a Final Agency Decision on the merits of the claim within 60 calendar days of its receipt of the complaint file. Complaints filed solely on these bases will not proceed to the U.S. Equal Employment Opportunity Commission. Other avenues of redress available to raise a claim of discrimination include the Administrative Grievance Procedures referenced above. Employees may file either an EEO complaint or a Grievance, but not both.

APPENDIX B: HRSA EEO AND ANTI-HARASSMENT POLICY STATEMENTS

HRSA Policy Statements on EEO and
Prohibited Discrimination and Anti-Harassment
Page 2

HRSA Anti-Harassment Policy

HRSA has a zero tolerance for workplace harassment, including sexual harassment, and other forms of harassment based on race, color, religion, national origin, sex, pregnancy, gender identity, parental status, sexual orientation, age, disability (physical or mental), and genetic information.

Workplace harassment is defined as any unwelcome, hostile, or offensive conduct that interferes with an individual's performance or creates an intimidating, hostile, or offensive work environment. Harassment by or against HRSA employees, applicants, contract employees, clients, customers, and anyone doing business with HRSA is prohibited.

Sexual harassment involves unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when: (1) submission to or rejection of such conduct is made either explicitly or implicitly a term or condition of one's employment, or (2) submission to or rejection of such conduct by a person is used as a basis for career or employment decisions affecting that person, or (3) such conduct interferes with an individual's performance or creates an intimidating, hostile, or offensive work environment.

Both supervisors and employees bear responsibility in maintaining a work environment free from workplace and sexual harassment. Employees should immediately report such conduct to their supervisor, another management official, Office of Human Resources (OHR) or OCRDI. Harassment claims will be handled confidentially to the greatest extent possible. If an employee brings an issue of harassment to a supervisor's attention, the supervisor must promptly consult with an OHR Labor and Employee Relations (LER) Specialist and investigate the matter, and take appropriate and effective corrective action, as necessary. Allegations of discrimination and harassment will be taken seriously and appropriate corrective action, up to and including termination, will be taken if allegations are substantiated.

HRSA will not tolerate retaliation against any employee for reporting matters under this policy or procedure, or for assisting in any inquiry about such a report. Supervisors are strongly encouraged to seek guidance from OCRDI staff, Human Resources staff, or the Office of the General Counsel when addressing issues of discrimination, retaliation, or harassment.

2/23/2018
Date

/George Sigounas/
George Sigounas, MS, Ph.D., Administrator

APPENDIX

Related Laws, Executive Orders, and Resources:

Title VII of the Civil Rights Act of 1964: <http://www.eeoc.gov/laws/statutes/titlevii.cfm>

Rehabilitation Act of 1973, as amended: <http://www.eeoc.gov/laws/statutes/rehab.cfm>

Age Discrimination in Employment Act of 1967, as amended:
<http://www.eeoc.gov/laws/types/age.cfm>

Equal Pay Act of 1963, as amended: <http://www.eeoc.gov/laws/statutes/epa.cfm>

Guidelines on Religious Exercise and Religious Expression in the Federal Workplace:
<http://www.eeoc.gov/laws/types/religion.cfm>

Pregnancy Discrimination Act of 1978: <http://www.eeoc.gov/laws/statutes/pregnancy.cfm>

Genetic Information Nondiscrimination Act of 2008:
<http://www.eeoc.gov/laws/statutes/gina.cfm>

Executive Order 13152, as amended by Executive Order 11478:
<http://www.archives.gov/federal-register/codification/executive-order/11478.html>

Executive Order 11478, as amended by Executive Order 13087:
<http://www.eeoc.gov/federal/otherprotections.cfm>

U.S. Office of Special Counsel: <http://www.osc.gov>

HHS Statement on Rights of Lesbian, Gay, Bisexual, and Transgender (LGBT) Individuals:
<http://www.hhs.gov/about/news/2014/06/03/hhs-secretary-sebelius-statement-observing-lgbt-pride-month.html>

HRSA's Handling Workplace Harassment Policy:
<https://sharepoint.hrsa.gov/oo/ohr/Shared%20Documents/HRSA%202015%20SOP%20Handling%20Workplace%20Harassment.pdf>

APPENDIX D: HRSA POLICY STATEMENT ON NOTIFICATION AND FEDERAL EMPLOYEE ANTIDISCRIMINATION AND RETALIATION ACT OF 2002



DEPARTMENT OF HEALTH & HUMAN SERVICES

Health Resources and Services
Administration

Rockville MD 20857

HEALTH RESOURCES AND SERVICES ADMINISTRATION (HRSA) POLICY STATEMENT ON NOTIFICATION AND FEDERAL EMPLOYEE ANTIDISCRIMINATION AND RETALIATION ACT OF 2002 (NO FEAR ACT)

No FEAR Act Notice

On May 15, 2002, Congress enacted the "Notification and Federal Employee Antidiscrimination and Retaliation Act of 2002," which is now known as the No FEAR Act. One purpose of the Act is to "require that Federal agencies be accountable for violations of antidiscrimination and whistleblower protection laws." Click on the following link for more information about the Act: <http://www.opm.gov/information-management/no-fear-act>.

Antidiscrimination Laws

A Federal agency cannot discriminate against an employee or applicant with respect to the terms, conditions or privileges of employment on the bases of race, color, religion, sex (pregnancy, gender identity, and sexual orientation), national origin, age, disability, genetic information, retaliation, marital status, or political affiliation. Discrimination on these bases is prohibited by one or more of the following statutes: 5 U.S.C. 2302(b) (1), 29 U.S.C. 206(d), 29 U.S.C. 631, 42 U.S.C. 2000ff-1(a)(1), 29 U.S.C. 633a, 29 U.S.C. 791, and 42 U.S.C. 2000e-16.

- If you believe that you have been the victim of unlawful discrimination on the bases of race, color, religion, sex (pregnancy, gender identity, and sexual orientation), national origin, age, disability, genetic information, or retaliation, you must contact an Equal Employment Opportunity (EEO) counselor within 45 calendar days of the alleged discriminatory action, or, in the case of a personnel action, within 45 calendar days of the effective date of the action, before you can file a formal complaint of discrimination with your agency. See [Title 29 of the Code of Federal Regulations \(C.F.R.\) Part 1614](#).
- If you believe that you have been the victim of unlawful discrimination based on age, you must either contact an EEO counselor as noted above or give notice of intent to sue to the Equal Employment Opportunity Commission (EEOC) within 180 days of the alleged discriminatory action.
- If you are alleging discrimination based on marital status or political affiliation, you may file a written complaint with the U.S. Office of Special Counsel (OSC) (*see* contact information below).
- In the alternative (or in some cases, in addition), you may pursue a discrimination complaint by filing a grievance through [HRSA's administrative or negotiated grievance procedures](#), if such procedures apply and are available.

APPENDIX D: HRSA POLICY STATEMENT ON NOTIFICATION AND FEDERAL EMPLOYEE ANTIDISCRIMINATION AND RETALIATION ACT OF 2002

HRSA Policy Statement on No FEAR Act
Page 2

Whistleblower Protection Laws

A Federal employee with authority to take, direct others to take, recommend or approve any personnel action must not use that authority to take or fail to take, or threaten to take or fail to take, a personnel action against an employee or applicant because of disclosure of information by that individual that is reasonably believed to evidence violations of any law, rule or regulation; gross mismanagement; gross waste of funds; an abuse of authority; or a substantial and specific danger to public health or safety, unless disclosure of such information is specifically prohibited by law and such information is specifically required by Executive Order to be kept secret in the interest of national defense or the conduct of foreign affairs.

Retaliation against an employee or applicant for making a protected disclosure is prohibited by 5 U.S.C. 2302(b)(8). If you believe that you have been the victim of whistleblower retaliation, you may file a written complaint (Form OSC-11) with the U.S. Office of Special Counsel at 1730 M Street NW, Suite 218, Washington, DC 20036-4505 or online through the OSC Website: <http://www.osc.gov>

Retaliation for Engaging in Protected Activity

A Federal agency cannot retaliate against an employee or applicant because that individual exercises his or her rights under any of the Federal Antidiscrimination or Whistleblower Protections Laws listed above.

If you believe that you are a victim of retaliation for engaging in protected activity, you must follow, as appropriate, the procedures described in the Antidiscrimination Laws and Whistleblower Protection Laws sections or, if applicable, the administrative or negotiated grievance procedures in order to pursue any legal remedy.

Disciplinary Actions

Under the existing laws, each agency retains the right, where appropriate, to discipline a Federal employee who has engaged in discriminatory or retaliatory conduct, up to and including removal.

If OSC has initiated an investigation under 5 U.S.C. 1214, however, according to 5 U.S.C. 1214(f), agencies must seek approval from the Special Counsel to discipline employees for, among other activities, engaging in prohibited retaliation.

Nothing in the No FEAR Act alters existing laws or permits an agency to take unfounded disciplinary action against a Federal employee or to violate the procedural rights of a Federal employee who has been accused of discrimination.

APPENDIX D: HRSA POLICY STATEMENT ON NOTIFICATION AND FEDERAL EMPLOYEE
ANTIDISCRIMINATION AND RETALIATION ACT OF 2002

HRSA Policy Statement on No FEAR Act
Page 3

Additional Information

For further information regarding the No FEAR Act regulations, refer to [5 C.F.R. Part 724](#), as well as HRSA's Office of Civil Rights, Diversity and Inclusion or the Office of Human Resources. Additional information regarding Federal Antidiscrimination, Whistleblower Protection and Retaliation Laws can be found at the EEOC Website: <http://www.eeoc.gov> and the OSC Website: <http://www.osc.gov>.

Existing Rights Unchanged

Pursuant to section 205 of the No FEAR Act, neither the Act nor this notice creates, expands or reduces any rights otherwise available to any employees, former employees or applicants under the laws of the United States, including the provisions of law specified in 5 U.S.C. 2302(d).

2/23/2018
Date

/George Sigounas/
George Sigounas, MS, Ph.D., Administrator