



Health Resources and Services Administration
EEOC Management Directive 715
Annual Report
Fiscal Year 2019

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, 2018 to September 30, 2019					
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. 1,865	
	2. Enter total number of temporary employees			2. 42	
	3. Enter total number employees paid from non-appropriated funds			3. 0	
	4. TOTAL EMPLOYMENT [add lines B 1 through 3]			4. 1,907	
PART C Agency Official(s) Responsible For Oversight of EEO Program(s)	1. Head of Agency Official Title		1. Thomas J. Engels, HRSA Administrator		
	2. Agency Head Designee		2. Diana Espinosa, Deputy Administrator		
	3. Principal EEO Director/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 or economically or medically vulnerable. HRSA programs support people living with HIV/AIDS, pregnant women, mothers and their families, and those in need of high-quality primary health care. HRSA employs 1,907 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 outcomes and address health disparities through access to quality services, a skilled health workforce, and innovative, high-value programs by improving access to quality health services; fostering a health care workforce able to address current and emerging needs, achieving health equity and enhancing population health; and optimizing HRSA operations and strengthening program management. Through its efforts, HRSA envisions a nation of “Healthy Communities, Healthy People.”

ASSESSING THE AGENCY’S EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

In FY 2019, 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). HRSA performed the assessment as part of the Agency’s ongoing obligation to eliminate barriers that impede free and open competition in the workplace and prevent individuals of any racial or national origin group, sex, or disability status from realizing their full potential. Based on the self-assessment findings, HRSA met 83% (129 out of 156) of the program expectations associated with the six essential elements of a model EEO program. Corrective action plans were developed in response to the remaining unmet program expectations. As outlined in Part H of this report, HRSA will implement these plans in FY 2020 and report progress toward eliminating the Agency’s EEO program deficiencies in subsequent annual reports.

Self-Assessment Findings: Agency EEO Program Strengths

HRSA’s self-assessment results indicated that the Agency’s strategic mission integrates EEO through the increased and intentional inclusion of OCRDI in activities pertaining to human capital management and succession planning initiatives. As a best practice, OCRDI continued to inform Bureau/Office leaders on the Agency’s EEO program status through Diversity and Inclusion Profile (DIP) meetings and allowed opportunities for managers to play an active role in assessing the Agency’s EEO Program, identifying barriers to EEO, and developing correction plans. Additional HRSA EEO Program strengths include but are not limited to:

- Incorporating EEO/diversity and inclusion principles in the 2019-2022 HRSA Strategic Plan.
- Issuing annual EEO policy statement clearly communicating the Agency’s commitment to EEO for all employees and applicants; briefing new employees and newly promoted supervisors on their roles, responsibilities, and rights related to the Agency’s EEO program; providing a copy of the EEO policy statement during New Employee Orientation and New Supervisor Orientation and through other outlets.
- Presenting Administrator’s Award for Equal Opportunity Achievement annually to employees or groups of employees who actively and effectively provide leadership and service to achieve significant advancement in equal opportunities and/or diversity in the Agency.
- Requiring new employees to complete “EEO Awareness Training for HHS” within 90 days of onboarding.

- Maintaining 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 and to 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.
- Ensuring the EEO Director has direct access to the HRSA Administrator and regularly consults and advises the Administrator on EEO and diversity matters.
- Holding standing meetings between the EEO Director, HRSA Administrator, Deputy Administrator, and Chief Operating Officer to discuss EEO matters such as compliance activity, workforce representation, and special emphasis programs.
- Maintaining ongoing communication and collaboration between the EEO Director and the HR Director through bi-weekly meetings 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 continues to comply with EEOC regulations, policy guidance, and other written instructions. HRSA maintains an efficient, fair, and impartial complaint resolution process. The Agency has a neutral process and encourages widespread use of the Alternative Dispute Resolution (ADR) program. 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 also 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 2019 self-assessment results indicated that HRSA's EEO program falls short of meeting the expectations in four central areas: 1) rating managers and supervisors on their commitment to EEO; 2) timely processing of reasonable accommodation requests; 3) workforce data and data systems integrity; and 4) timely provision of final agency decisions.

Rating Managers and Supervisors on their Commitment to EEO

Performance appraisals include a specific administrative requirement for managers/supervisors and team leaders, in which all leaders must be rated on how well they "demonstrate support for EEO/diversity and employee work-life quality, fostering a cooperative work environment where diverse opinions are solicited and respected" as well as "seek resolution for workplace conflicts at earliest stage." However, these two measures do not cover the full scope of ensuring equal employment opportunity pursuant to the factors outlined under Critical Element C of the EEOC Management Directive 715 such as "ensuring that subordinate supervisors have managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees." Currently, this program limitation is considered an HHS-wide EEO program deficiency that requires collaboration and guidance across all HHS Operational Divisions in order to fully eliminate. HRSA is committed to actively participate in the development of a new set of performance standards for all of HHS that address the critical aspects of EEO, diversity and inclusion.

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 and 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 percent of the Agency's RA requests were processed within the Agency's established timeframes as required by EEOC. The Agency began full implementation of the Reasonable Accommodation Processing and Tracking (RAPT) System in FY 2018 to fully automate the RA request process, allowing for real-time, role-based user dashboards and the production of standardized and customized reports. . In FY 2-19, sixty-four percent (150) of the Agency's RA requests were processed within the established timeframes. Case analysis shows that HRSA supervisors continue to lack responsiveness to RA requests, require reminders to respond, or request extensions to respond. As an example, markers built into the RAPT system and used by the Accessibility Specialists when a reminder is issued, show that 30 cases required multiple formal (i.e., email) reminders with 11 of those requiring

further escalation to include an up-line manager. The reminder rate for informal reminders (i.e., phone calls which are also tracked) is higher.

In response to these trends, HRSA will 1) draft an SOP on case escalation, 2) develop a plan for addition markers and/or reporting on supervisory response time, 3) conduct RA analysis based on case complexity to determine additional factors which impact processing, and 4) develop a short form training for managers and supervisors to bring more management officials into compliance with RA training. Additionally, the Agency will use the HRSA intranet to report key aggregate RA data to include Bureau/Office average processing timeframes and responsiveness. HRSA will report on progress in this area in subsequent reports.

Workforce Data and Data Systems

Additionally, in line with HHS's efforts to develop a model EEO program, HHS headquarters along with the operating divisions (OpDiv) have been working together to assess the strengths and weaknesses of our EEO and diversity programs. This enhanced partnership began when a new HHS Deputy EEO Officer and Director, Office of Equal Employment Opportunity, Diversity and Inclusion was appointed in 2019. Through this collaborative headquarters/OpDiv effort, we have identified deficiencies specifically related to the integrity of our data and data systems. These data deficiencies were further accentuated by HHS's recent transition to a new human resources system, the Enterprise Human Capital Management System (EHCM), and by the EEOC's changes to the required 2.0 data tables.

We will be working during the next several months to improve our data systems, data collection methods, reporting mechanisms and use of the data. We have completed Part E, I, and J for the FY 2019 report with current data, but we have concerns about its integrity. We expect to improve the integrity of the Department's data significantly based upon our Part H Plan. If you have any questions, please feel free to contact Julie Murphy, HHS Deputy EEO Officer / Director, Office of Equal Employment Opportunity, Diversity and Inclusion.

Timely Provision of Final Agency Decisions

A critical aspect of the EEO complaint process is the timely issuance of final agency decisions (FADs). While FADs are written and issued by HHS, HRSA, in alignment with all HHS operating divisions, acknowledges that they are not timely and has expressed concerns through ongoing discussions with the Department. The Department recognizes the program deficiencies associated with untimely FADs and has committed to addressing the short falls as outlined in the Part H action plans contained in Appendix D.

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 was not included. The Commissioned Corps comprise 9.15 percent (192) of HRSA's total combined permanent and temporary workforce. The comprehensive analysis of HRSA's workforce data revealed a five-year continuation of underrepresentation among some race/national origin (RNO) and gender groups and among persons with a targeted disability in the overall civilian workforce, mission critical occupations, and senior level positions. Below is a summary of the workforce statistics used to identify and address these triggers.

In FY 2019, HRSA employed 1,907 civilian employees, 97.8 percent (1,865) of which held permanent positions. The Agency had a net gain of 0 civilian employees, reflecting a 0 percent net change in its workforce since FY 2018.

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

Race/Ethnicity and Gender

Female representation has declined to 70.78 percent (1,320) of the Agency's permanent workforce but continues to surpass the percentage of females in the civilian labor force (48.14 percent). Fifty-five percent (1,026) of HRSA's permanent civilian workforce consists of racial/ethnic minorities in which 739 Black (39.62 percent) and 188 Asian (10.08

percent) employees have higher than expected participation rates when compared to the CLF benchmarks of 12.02 percent and 3.9 percent, respectively. Conversely, all other RNO groups have less than expected participation rates in the overall permanent civilian workforce. HRSA has noted this pattern for several fiscal years. American Indians/Alaska Natives (AI/AN) comprise 0.59 percent (11) of the workforce. Also, there continues to be an absence of employees who self-identify as Native Hawaiian or other Pacific Islander. Despite accounting for 9.96 percent of the CLF, Hispanic employees make up 4.66 percent (87) of the workforce and 1.39 percent (1) of the new hires; however, their percentage among HRSA separations is lower than expected, at 1.03 percent (1). Groups with higher than expected percentages among HRSA separations, when compared to their HRSA permanent workforce participation rates, include 73 females (75.26 percent) – particularly those who are White (36.08 percent, or 35), Black (32.99 percent, or 32) and AI/AN (2.06 percent, or 2) – as well as 9 Black males (9.28 percent).

Disability

Persons with disabilities make up 9.82 percent (186) of the permanent workforce, and those with targeted disabilities comprise 1.85 percent (35), which are both below their respective 12 percent and 2 percent HHS benchmarks. HRSA's percentage of permanent new hires with targeted disabilities among the new hires decreased from 6.45 percent (2) in FY 2018 to 0.91 percent (1) in FY 2019. In FY 2019, persons with targeted disabilities separated at a rate of 1.64 percent (2) among HRSA's permanent separations, which exceeds their representation among permanent new hires but is below their permanent workforce representation.

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 1,182 employees in these positions account for 63.38 percent of the permanent workforce. An analysis of the Agency's participation rates with these MCOs revealed that Black males, Black females, and Asian females 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, closely align with this finding. Asian males have a less than expected participation rate of 2.75 percent in the 0343 job series when compared to the 3.4 percent RCLF. Hispanic females and females as a whole have less than expected participation rates in the 2210 series—0 percent compared to 1.6 percent RCLF, and 31.25 percent compared to 33.2 percent RCLF, respectively. The remaining groups have low participation rates in at least two of the top three most populous MCOs. Note, White males have lower than expected representation in all three of these job series.

Sixty-three percent (45) of new hires filled one of the top three most populous MCOs. Among them, females as a whole and Black males exceeded all three of the corresponding RCLF benchmarks, while Black females and Asian males and females exceeded two of the RCLF benchmarks. Hispanic females exceeded only one RCLF benchmark. The remaining RNO and gender groups 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 9.82 percent (186) of the Agency's permanent workforce, this group has less than expected representation at 8.28 percent (61) in the 0685 workforce and 9.24 percent (34) in the 0343 workforce, but higher than expected representation at 17.35 percent (17) in the 2210 workforce. Persons with a disclosed targeted disability account for 1.85 percent (35) of the permanent workforce and 1.02 percent (1) in the 2210 series, while surpassing the HHS Departmental 2-percent benchmark in the 0685 series at 2.58 percent (19) and in the 0343 series at 2.45 percent (9). Additionally, persons with targeted disabilities were represented among 9.09 percent (1) of the new hires into the 0343 series, thereby exceeding the 2-percent benchmark for persons with targeted disabilities; however, no persons with targeted disabilities were present among the 0685 nor the 2210 series of new hires.

Senior Level Positions

Race/Ethnicity and Gender

When assessing whether triggers to EEO exist among any one group of employees in senior level positions, HRSA compared all groups to their overall participation rates in permanent GS grades and the SES. To that end, 79.17 percent (1,475) of HRSA's permanent civilian workforce are in GS-13 positions or above. Specifically, 45.95 percent (856 employees) are in GS-13 positions, 19.32 percent (360) are in GS-14 positions, 12.56 percent (234) are in GS-15 positions, and 1.34 percent (25) are in the Senior Executive Service (SES).

Despite having less than expected representation as a whole at HRSA, 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 higher than expected in GS-14 positions and above, such that males account for 29.15 percent (543) of the permanent civilian workforce in GS and SES pay plans and 36.11 percent (130) of GS-14 employees, 35.04 percent (82) of GS-15 employees, and 36 percent (9) of the SES. A similar pattern is also found among White males who account for 14.92 percent (278) of the permanent civilian workforce but 18.33 percent (66) of GS-14, 22.65 percent (53) of GS-15, and 32 percent (8) of SES positions.

An inverse relationship was found among females, in which females generally had lower than expected participation rates in GS-14 (63.89 percent, or 230 employees), GS-15 (64.96 percent, or 152), and SES (64 percent, or 16) positions, despite accounting for 70.85 percent (1,320) of the Agency's permanent civilian workforce in GS and SES pay plans. Similar findings were found among Blacks, particularly Black females. Accounting for 30.76 percent (573) of the Agency's permanent civilian workforce, 87 Black females were in GS-14 (24.17 percent), 39 were in GS-15 (16.67 percent), and 4 were in SES (16 percent) positions at lower than expected rates.

When assessing representation across the SES, White males and females and Hispanic males and females have higher than expected rates of participation. However, whereas Black females have a less than expected participation rate in the SES, Black males, Asian males and females, American Indian/Alaska Native males and females, and males and females of two or more races or unknown race, continue to be absent. HRSA will explore the root causes of these trends throughout FY 2020 and report findings.

Disability

Persons with targeted disabilities have lower than expected participation rates in all senior level positions relative to their overall permanent GS and SES representation at 1.85 percent (35). Workforce data indicate a decline in participation among this group with each increase in grade level, with higher than expected representation in GS-13 at 2.06 percent (18), then lower than expected representation starting in GS-14 at 0.55 percent (2), and GS-15 at 0.42 percent (1). SES has higher than expected representation at 4 percent (1) but note the small sample size.

ACCOMPLISHMENTS

HRSA made the following notable accomplishments throughout FY 2019:

- To ensure HRSA can meet current and anticipated workforce requirements, established and implemented a strategic human capital operating plan that reinforces principles of EEO and leverages the talents of a diverse workforce.
- Fully implemented the Agency's rotational site visit plan in which the Agency's EEO office conducted four regional site visits (Atlanta, Kansas City, Denver, and Dallas) to inform regional offices about available EEO services and resources and to provide EEO training, including a module regarding the prevention of sexual harassment in the federal workplace.
- Established the Agency's Alternative Dispute Resolution Program as a successful alternative to engaging in traditional EEO counseling, with 67 percent of all ADR mediations resulting in a settlement.
- Briefed 100 percent of the Agency's Bureau/Office leaders on their respective workforce diversity and inclusion profile (DIP); utilized the HRSA DIP reports and briefings to engage with Bureaus/Offices on workforce data, recruitment, and best practices/strategies that can be employed by Bureau/Office leadership to strengthen the Agency's EEO program.

- Enhanced the Agency's resume repository of Schedule A eligible candidates to allow for increased hiring of qualified individuals with a disability. In FY 2019, 12 out of 110 of the Agency's permanent new hires were persons with disabilities, whereas five persons with disabilities out of 31 were hired in FY 2018.
- Provided interactive trainings for managers and supervisors on EEO compliance, Diversity and Inclusion, and RA, to include timely and relevant topics such as unconscious bias and preventing harassment. Recently added training on preventing sexual harassment in the federal workplace, in which managers and supervisors in 80% of the Agency's Bureaus/Offices were trained. Piloted religious accommodations training for the Agency's managers and supervisors; the HRSA-wide course will be offered starting in mid FY 2020.
- Held a "State of the Agency" briefing to inform the HRSA Administrator on the overall critical action plan for the Agency in FY 2019.
- Continued conducting a needs assessment and barrier analysis in support of the newly established Federal Women's Program.
- Continued to leverage the diverse workforce at HRSA with special knowledge or experience in the issues facing protected classes to assist in the work of removing barriers to healthcare for vulnerable populations.
- Awarded the Administrator's Award for Equal Opportunity Achievement to an employee who demonstrated superior accomplishment in EEO.

PLANNED ACTIVITIES FOR FY 2020

Highlights of HRSA's FY 2020 planned activities include:

- Continuing to train managers and supervisors in key diversity, RA and EEO areas as a best practice for fostering a diverse and inclusive workforce that is discrimination-free. FY 2020 trainings will focus on religious accommodations for employees (new), the full launch of Religious Accommodations training for Managers and Supervisors, the continuation of preventing sexual harassment training for managers and supervisors, and the EEO complaints process (new).
- Conducting a comprehensive assessment using the Reasonable Accommodations Processing Tracking (RAPT) System to benchmark supervisory response time and identify additional barriers and improve processing times.
- Implementing a series of data collection activities in support of conducting a barrier analysis for women's employment at HRSA.
- Performing an EEO site visit at two HRSA regional offices. Given the current National Health Emergency, we will postpone this activity until travel restrictions are lifted.

**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/

July 22, 2020

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

Date

/Thomas J. Engels/



August 11, 2020

Signature of Agency Head or Agency Head Designee

Date



MD-715 - PART G



Agency Self-Assessment Checklist



Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP				
This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.				
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments	Current Part G Questions
A.1.a	A.1 – The agency issues an effective, up to date EEO policy statement.	Yes	October 10, 2019	A.1.a.2
A.1.b	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency’s commitment to EEO for all employees and applicants? If “yes”, please provide the annual issuance date in the comments column. [see MD-715, II(A)]	Yes		New
A.2.a	A.2 – The agency has communicated EEO policies and procedures to all employees.			
A.2.a.1	Does the agency disseminate the following policies and procedures to all employees:			
A.2.a.1	Anti-harassment policy? [see MD 715, II(A)]	Yes		New
A.2.a.2	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	Yes		New
A.2.b	Does the agency prominently post the following information throughout the workplace and on its public website:			



A.2.b.1	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]	Yes		New
A.2.b.2	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	Yes		A.2.c
A.2.b.3	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	Yes	https://www.hrsa.gov/sites/default/files/hrr/nofearact/forms/ra-manual.pdf	A.3.c
A.2.c	Does the agency inform its employees about the following topics:			
A.2.c.1	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often.	Yes	Employees are informed about the EEO complaint process several times throughout the fiscal year, including but not limited to, during biweekly new employee orientation, through quarterly EEO trainings, and at the time of the annual issuance of the EEO policy statement. Information is also posted throughout the building as well as provided as requested and needed.	A.2.a
A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Yes	Employees are informed about the ADR complaints process several times throughout the fiscal year, including but not limited to, during	New

			biweekly new employee orientation, through quarterly EEO trainings, during EEO Intake, and at the time of the annual issuance of the EEO policy statement. Information is also provided as requested and needed.	
A.2.c.3	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Yes	Employees are informed about the Reasonable Accommodation (RA) Program at biweekly new employee orientations and quarterly RA trainings. Information is also provided as requested and needed.	New
A.2.c.4	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.	Yes	Employees are informed about the Anti-harassment Program several times throughout the fiscal year, including but not limited to, during biweekly new employee orientations, through quarterly EEO trainings, and at the time of the annual issuance of the EEO policy statement. Information is also provided as requested and needed.	New



A.2.c.5	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If “yes”, please provide how often.	Yes	Employees are informed about inappropriate workplace behaviors several times throughout the fiscal year, including but not limited to, during biweekly new employee orientation, through quarterly EEO trainings, and at the time of the annual issuance of the EEO policy statement. Information is also provided as requested and needed. Additionally, the Agency launched a new training for managers on performance accountability that also reviews the employee code of conduct.	A.3.b
 Compliance Indicator  Measures	A.3 – The agency assesses and ensures EEO principles are part of its culture.	Measure Met? (Yes/No/NA)	Comments New Compliance Indicator	
A.3.a	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.	Yes	As part of the annual HRSA Honor Awards, the Administrator’s Award for Equal Opportunity Achievement is presented to	New

			employees or groups of employees who actively and effectively provide leadership and service to achieve significant advancement in equal opportunities and/or diversity in the Agency workplace or workforce.	
A.3.b	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Yes		New
Essential Element B: INTEGRATION OF EEO INTO THE AGENCY'S STRATEGIC MISSION				
This element requires that the agency's EEO programs are structured to maintain a workplace that is free from discrimination and support the agency's strategic mission.				
 Compliance Indicator	B.1 - 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 Met? (Yes/No/NA)	Comments	
 Measures				
B.1.a	Is the agency head the immediate supervisor of the person ("EEO Director") who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes	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	B.1.a



			programmatic Bureaus and Offices.	
B.1.a.1	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If "yes," please provide the title of the agency head designee in the comments.	Yes		New
B.1.a.2	Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes		B.1.d
B.1.b	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes		B.2.a
B.1.c	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comments column.	Yes	August 2019	B.2.b
B.1.d	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]	Yes		New
 Compliance Indicator  Measures	B.2 – The EEO Director controls all aspects of the EEO program.	Measure Met? (Yes/No/NA)	Comments New Compliance Indicator	
B.2.a	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]	Yes		B.3.a
B.2.b	Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)]	Yes		New
B.2.c	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes		New



B.2.d	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)]. [This question may not be applicable for certain subordinate level components.]	N/A	The Department issues final agency decisions.	New
B.2.e	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Yes		F.3.b
B.2.f	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]	Yes		New
B.2.g	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2) and (c)(3)]	Yes		New
 Compliance Indicator  Measures	B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.	Measure Met? (Yes/No/NA)	Comments	
B.3.a	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]	Yes	EEO program officials regularly participate and are consulted regarding workforce changes that might impact EEO issues such as strategic planning and recruitment strategies. In FY 2019, the EEO program officials will utilize bi-weekly meetings with the Office of Human Resources and HRSA's Executive Officers to discuss vacancy projections and their EEO impact on a more consistent	B.2.c & B.2.d



			basis. In addition, the EEO Director has monthly meeting with the Chief Operating Officer to consult and discuss workforce changes that might impact EEO issues.	
B.3.b	Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.	Yes	<p>Sub-objective 4.2.1 Ensure HRSA can meet current and anticipated workforce requirements by establishing and implementing a strategic human capital operating plan that reinforces principles of Equal Opportunity Employment and leverages the talents of a diverse workforce.</p> <p>Sub-objective 4.2.2 Recruit, hire, and retain a talented and diverse HRSA workforce based on the needs of the organization and in alignment with workforce planning principles.</p>	New



 Compliance Indicator  Measures	B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.	Measure Met? (Yes/No/NA)	Comments	
B.4.a	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:			
B.4.a.1	to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	Yes		B.3.b
B.4.a.2	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	Yes		B.4.a
B.4.a.3	to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	No	EEO counseling, investigations and legal sufficiency reviews are conducted in-house, and the Agency has sufficient budget and staffing to timely, thoroughly and fairly process EEO complaints. However, final agency decisions are issued by the Department and are oftentimes untimely due to limited staffing. The Department is devising and implementing a Part H corrective action plan to address this Department-wide program deficiency.	E.5.b
B.4.a.4	to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	Yes	HRSA has sufficient funding to provide all supervisors and employees with training on the EEO	B.4.f & B.4.g

			program. Training is currently available on retaliation, harassment, reasonable accommodation, and unconscious bias. Religious accommodations training was piloted in FY 2019 with a course launch to all HRSA employees expected in mid-FY 2020; the Agency will pilot the EEO complaints process training, inclusive of ADR, in FY 2020.	
B.4.a.5	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]	N/A	HRSA does not have EEO representation in the ten regional offices; all EEO functions are centralized at headquarters.	E.1.c
B.4.a.6	to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	Yes		B.4.c
B.4.a.7	to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	Yes		New
B.4.a.8	to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]	Yes		B.3.c, B.3.c.1, B.3.c.2, & B.3.c.3
B.4.a.9	to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I]; EEOC Enforcement Guidance on Vicarious	Yes		New



	Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]			
B.4.a.10	to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]	Yes		B.4.d
B.4.a.11	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Yes		New
B.4.b	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	Yes		New
B.4.c	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes		B.1.b
B.4.d	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?	Yes		E.2.d
B.4.e	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	Yes		E.2.e
 Compliance Indicator  Measures	B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.	Measure Met? (Yes/No/NA)	Comments	New Indicator
B.5.a	Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:			
B.5.a.1	EEO Complaint Process? [see MD-715(II)(B)]	Yes	All managers and supervisors are required to take the EEO Awareness training on a biannual basis. The Agency is piloting the EEO Complaint Process training in FY 2020.	New
B.5.a.2	Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]	Yes	All managers and supervisors are required to take the EEO Awareness	A.3.d

			training on a biannual basis; additionally, the Agency offers RA training to employees on a quarterly basis as well as upon request.	
B.5.a.3	Anti-Harassment Policy? [see MD-715(II)(B)]	Yes	All managers and supervisors are required to take the EEO Awareness training on a biannual basis; additionally, the Agency offers anti-harassment training upon request.	New
B.5.a.4	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	Yes	The Agency offers targeted trainings to supervisors through the HRSA Learning Institute (HLI).	New
B.5.a.5	ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	Yes	All managers and supervisors are required to take the EEO Awareness training on a biannual basis; however, the Agency will pilot the EEO Complaint Process training in FY 2020. This training will cover various aspects of ADR.	E.4.b
 Compliance Indicator  Measures	B.6 – The agency involves managers in the implementation of its EEO program.	Measure Met? (Yes/No/NA)	Comments New Indicator	

B.6.a	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	Yes		New
B.6.b	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	Yes		D.1.a
B.6.c	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	Yes		D.1.b
B.6.d	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR § 1614.102(a)(5)]	Yes		D.1.c
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  Measures	C.1 – The agency conducts regular internal audits of its component and field offices.	Measure Met? (Yes/No/NA)	Comments	
C.1.a	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] if yes, please provide the schedule for conducting audits in the comments section.	N/A	HRSA does not have EEO representation in the ten regional offices; however the Agency does conduct site visits to assess EEO program deficiencies.	New
C.1.b	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] if yes, please provide the schedule for conducting audits in the comments section.	N/A	HRSA does not have EEO representation in the ten regional offices; however the Agency does conduct site visits to assess EEO program deficiencies and address barriers within the workplace.	New



C.1.c	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	N/A	Although HRSA does not conduct field audits, all components and regional offices make reasonable efforts to comply with site visits recommendations.	New
 Compliance Indicator  Measures	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (Yes/No/NA)	Comments New Indicator	
C.2.a	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC’s enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes		New
C.2.a.1	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes		New
C.2.a.2	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	Yes		New
C.2.a.3	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes		New
C.2.a.4	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [see Enforcement Guidance, V.C.]	Yes		New
C.2.a.5	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <u>Complainant v. Dep’t of Veterans Affairs</u> , EEOC Appeal No. 0120123232 (May 21, 2015); <u>Complainant v. Dep’t of Defense (Defense Commissary Agency)</u> , EEOC Appeal No.	Yes		New





	0120130331 (May 29, 2015)] If “no”, please provide the percentage of timely-processed inquiries in the comments column.			
C.2.a.6	Do the agency’s training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR 1614.203(d)(2)]	Yes		New
C.2.b	Has the agency established disability reasonable accommodation procedures that comply with EEOC’s regulations and guidance? [see 29 CFR 1614.203(d)(3)]	Yes		New
C.2.b.1	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]	Yes		E.1.d
C.2.b.2	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	Yes		New
C.2.b.3	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]	Yes		New
C.2.b.4	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]	Yes		New
C.2.b.5	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] if no, please provide the percentage of timely-processed requests in the comments column.	No	In FY 2019, 64 percent of HRSA’s reasonable accommodation requests were processed within the 45-day timeframe set forth in the Agency’s Reasonable Accommodation Policy and Procedures Manual.	E.1.e
C.2.c	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC’s regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	Yes		New
C.2.c.1	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §	Yes	https://www.hrsa.gov/sites/default/files/h	New





	1614.203(d)(5)(v)], if yes, please provide the internet address in the comments column.		r/nofearact/forms/ra-manual.pdf	
 Compliance Indicator  Measures	C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	Measure Met? (Yes/No/NA)	Comments New Indicator	
C.3.a	Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	Yes		New
C.3.b	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:			
C.3.b.1	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.]	No	HRSA is actively participating in HHS' efforts to revise the existing performance standard to better rate all HHS managers and supervisors on this performance measure. Progress will be reported in subsequent MD-715 reports.	A.3.a.1
C.3.b.2	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	No	HRSA is actively participating in HHS' efforts to revise the existing performance standard to better rate all HHS managers and supervisors on this performance measure. Progress will be reported in subsequent MD-715 reports.	A.3.a.4



C.3.b.3	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	No	HRSA is actively participating in HHS' efforts to revise the existing performance standard to better rate all HHS managers and supervisors on this performance measure. Progress will be reported in subsequent MD-715 reports.	A.3.a.5
C.3.b.4	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	No	HRSA is actively participating in HHS' efforts to revise the existing performance standard to better rate all HHS managers and supervisors on this performance measure. Progress will be reported in subsequent MD-715 reports.	A.3.a.6
C.3.b.5	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	No	HRSA is actively participating in HHS' efforts to revise the existing performance standard to better rate all HHS managers and supervisors on this performance measure. Progress will be reported in subsequent MD-715 reports.	A.3.a.7
C.3.b.6	Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]	No	HRSA is actively participating in HHS' efforts to revise the	A.3.a.8




			existing performance standard to better rate all HHS managers and supervisors on this performance measure. Progress will be reported in subsequent MD-715 reports.	
C.3.b.7	Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]	No	HRSA is actively participating in HHS' efforts to revise the existing performance standard to better rate all HHS managers and supervisors on this performance measure. Progress will be reported in subsequent MD-715 reports.	New
C.3.b.8	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]	Yes		A.3.a.2
C.3.b.9	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	Yes		New
C.3.c	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	N/A	Mechanisms are in place to address such issues at a lower level and have not warranted Agency head involvement. However, the EEO Director will recommend improvements or corrections for managers and	New


			supervisors who have failed in their EEO responsibilities, should the situation rise to the level of involving the HRSA Administrator.	
C.3.d	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	N/A	The EEO Director has not recommended remedial or disciplinary actions.	New
 Compliance Indicator  Measures	C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.	Measure Met? (Yes/No/NA)	Comments	
C.4.a	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	Yes		New
C.4.b	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	Yes		C.2.a, C.2.b, & C.2.c
C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	No	The continued use of multiple data systems has created HHS-wide data challenges that are being addressed at the Departmental level with a plan that is fully supported by HRSA.	New
C.4.d	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	Yes		New



C.4.e	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:			
C.4.e.1	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	Yes		New
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	Yes		New
C.4.e.3	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Yes		New
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	Yes		New
C.4.e.5	Assist in preparing the MD-715 report? [see MD-715, II(C)]	Yes		New
 Compliance Indicator  Measures	C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.	Measure Met? (Yes/No/NA)	Comments	
C.5.a	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)]	Yes	HRSA adopted the HHS table of penalties.	C.3.a.
C.5.b	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Yes	3 individuals	C.3.c
C.5.c	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [see MD-715, II(C)]	Yes		New
 Compliance Indicator  Measures	C.6 – The EEO office advises managers/supervisors on EEO matters.	Measure Met? (Yes/No/NA)	Comments	
C.6.a	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see	Yes	Annual State of the Agency Briefings; Monthly Senior Staff Meetings;	C.1.a





	MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments column.		Quarterly EEO Trainings; Bi-annual DIP Briefings; Bi-weekly Executive Officers’ Meetings	
C.6.b	Are EEO officials readily available to answer managers’ and supervisors’ questions or concerns? [see MD-715 Instructions, Sec. I]	Yes		New
Essential Element D: PROACTIVE PREVENTION				
This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.				
 Compliance Indicator  Measures	D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.	Measure Met? (Yes/No/NA)	Comments	
D.1.a	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	Yes		New
D.1.b	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I]	Yes		New
D.1.c	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]	Yes		New
 Compliance Indicator  Measures	D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Measure Met? (Yes/No/NA)	Comments New Indicator	



D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	Yes		New
D.2.b	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	Yes	Management/ personnel policies, procedures and practices are examined when changes are made. The Agency will remind key stakeholders of the need to continue this level of assessment on a routine basis.	B.2.c.2
D.2.c	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 realignments? [see 29 CFR §1614.102(a)(3)]	Yes		B.2.c.1
D.2.d	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] If “yes”, please identify the data sources in the comments column.	Yes	Complaint data; Exit surveys; Focus groups; Federal Employee Viewpoint Survey; Reasonable Accommodation Program Data; Special Emphasis Program Data; Employee Resource Groups; Diversity and Inclusion Council	New
 Compliance Indicator  Measures	D.3 – The agency establishes appropriate action plans to remove identified barriers.	Measure Met? (Yes/No/NA)	Comments New Indicator	



D.3.a.	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	Yes		New
D.3.b	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	Yes	Targeted dates for planned activities are revisited throughout the fiscal year and adjusted as necessary.	New
D.3.c	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	Yes		New
 Compliance Indicator  Measures	D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.	Measure Met? (Yes/No/NA)	Comments New Indicator	
D.4.a	Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d)(4)]. Please provide the internet address in the comments.	Yes	https://www.hrsa.gov/eo/policies-reports-resources/no-fear-act	New
D.4.b	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]	Yes		New
D.4.c	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]	Yes		New
D.4.d	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)]	Yes		New
Essential Element E: EFFICIENCY				
This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency’s EEO programs and an efficient and fair dispute resolution process.				
		Measure Met?	Comments	





Compliance Indicator	E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.	(Yes/No/NA)		
 Measures				
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Yes		E.3.a.1
E.1.b	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Yes		E.3.a.2
E.1.c	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(l)?	Yes		New
E.1.d	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(l)? If so, please provide the average processing time in the comments.	Yes	50 days	New
E.1.e	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	Yes		New
E.1.f	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	Yes		E.3.a.3
E.1.g	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	Yes		New
E.1.h	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	No	The Department issues final agency decisions and has devised a plan to eliminate this HHS-wide deficiency.	E.3.a.4
E.1.i	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?	No	The Department issues final agency decisions and has devised a plan to eliminate this HHS-wide deficiency.	E.3.a.7
E.1.j	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor	N/A	Standard language is in the contract; HHS	E.2.c

	work product and/or delays? [See MD-110, Ch. 5(V)(A)] If “yes”, please describe how in the comments column.		handles all accountability issues.	
E.1.k	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes		New
E.1.l	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes		New
 Compliance Indicator  Measures	E.2 – The agency has a neutral EEO process.	Measure Met? (Yes/No/NA)	Comments Revised Indicator	
E.2.a	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)]	Yes	HRSA/OCRDI ensures that actions taken by the agency to protect itself from legal liability do not negatively influence or affect the agency's process for determining whether discrimination has occurred.	New
E.2.b	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If “yes”, please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.	Yes	Legal sufficiency reviews are conducted internally.	E.6.a
E.2.c	If the EEO office relies on the agency's defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]	N/A	The EEO office does not rely on the agency's defensive function to conduct the legal sufficiency review.	New
E.2.d	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	Yes		E.6.b

E.2.e	If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)]	N/A		E.6.c
 Compliance Indicator  Measures	E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Measure Met? (Yes/No/NA)	Comments	
E.3.a	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	Yes		E.4.a
E.3.b	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Yes		E.4.c
E.3.c	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	Yes		D.2.a
E.3.d	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes		New
E.3.e	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Yes		E.4.d
E.3.f	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Yes		New
 Compliance Indicator  Measures	E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Measure Met? (Yes/No/NA)	Comments	
E.4.a	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:			
E.4.a.1	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	Yes		E.5.a
E.4.a.2	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	No	This HHS-wide deficiency will be addressed at the	E.5.c

			Departmental level with full support from HRSA.	
E.4.a.3	Recruitment activities? [see MD-715, II(E)]	Yes		E.5.f
E.4.a.4	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	No	This HHS-wide deficiency will be addressed at the Departmental level with full support from HRSA.	New
E.4.a.5	The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]	Yes		New
E.4.a.6	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	Yes		New
E.4.b	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	No	HRSA participates in the re-survey efforts of the Department.	New
 Compliance Indicator  Measures	E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.	Measure Met? (Yes/No/NA)	Comments	
E.5.a	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	On an annual basis, the EEO program is assessed, in which trends related to RA, EEO complaint activity, and diversity are determined and compared to the Agency obligations.	E.5.e
E.5.b	Does the agency review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	HRSA's biannual Diversity and Inclusion Profile was adopted from the US Department of	E.5.g

			Agriculture when its activities associated with informing leadership of their workforce diversity profile were deemed best practices in ensuring EEO.	
E.5.c	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Yes		E.3.a
Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE				
This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.				
 Compliance Indicator  Measures	F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.	Measure Met? (Yes/No/NA)	Comments	
F.1.a	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	Yes		F.1.a
F.1.b	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	Yes		E.3.a.6
F.1.c	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes		F.2.a.1
F.1.d	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes		F.2.a.2
F.1.e	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	N/A	The Agency has not had this issue; however, compliance officers will be held accountable for unsatisfactory work products in the event that this occurs.	F.3.a.

 Compliance Indicator  Measures	F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Measure Met? (Yes/No/NA)	Comments Indicator moved from E-III Revised	
F.2.a	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	Yes		C.3.d
F.2.a.1	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]	Yes		E.3.a.5
F.2.a.2	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	Yes		E.3.a.7
F.2.a.3	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC’s Office of Federal Operations? [see 29 CFR §1614.403(e)]	Yes		New
F.2.a.4	Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes		F.3.d (1 to 9)
 Compliance Indicator  Measures	F.3 - The agency reports to EEOC its program efforts and accomplishments.	Measure Met? (Yes/No/NA)	Comments	
F.3.a	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	Yes		New
F.3.b	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	Yes		New

MD-715 – PART H.1

AGENCY EEO PLAN TO ATTAIN THE ESSENTIAL ELEMENTS OF A MODEL EEO PROGRAM

Please describe the status of each plan that the agency has implemented to correct deficiencies in the EEO program.

If the agency did not address any deficiencies during the reporting period, please check the box.

Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
C.2.b.5	The Agency does not process all accommodation requests within the time frame set forth in its reasonable accommodation procedures. [see MD-715, II(C)]

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/10/2014	Ensure all RA requests are processed within the timeframe set forth in the Agency's procedures for reasonable accommodation.	09/30/2018	9/30/2021	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Director, OCRDI	Anthony Archeval	Yes
Deputy Director, OCRDI	Golda Philip	Yes
Manager, Accessibility Program	Katherine Slye-Griffin	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
02/28/2016	Recruit and hire a qualified manager to lead and oversee the activities of HRSA's Accessibility Team.	Yes		12/31/2016
09/30/2017	Deploy the web-based RA processing system for use by HRSA employees and management.	Yes		09/30/2017
09/30/2017	Finalize the RA Policy and Procedures Manual.	Yes		09/30/2017
10/31/2017	Disseminate the finalized RA Policy and Procedures Manual.	Yes		09/30/2017
09/30/2017	Develop "RA Refresher Training for Managers and Supervisors" to acclimate HRSA management to the RAPT System.	Yes		09/30/2017
09/30/2018	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.	Yes		09/30/2018
09/30/2018	Perform quarterly RA processing audits to assess improvements in RA request processing times.	Yes		09/30/2018
09/30/2018	Report findings and key steps to be taken to address any barriers to improving processing times to leadership.	Yes		09/30/2018
09/30/2019	Continue to provide "RA Refresher Training for Managers and Supervisors" to HRSA management to discuss the RAPT System and educate	Yes		09/30/2019

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
	leaders on the RA policy and procedures.			
09/30/2019	Continue to perform quarterly RA processing audits to assess improvements in RA request processing times.	Yes		09/30/2019
09/30/2019	Continue to report findings and key steps to be taken to address any barriers to improving processing times to leadership.	Yes		09/30/2019
01/31/2020	Appoint a team lead to provide mentorship, coaching, and support in escalating cases to the Accessibility Manager.	Yes		
03/31/2020	Cross train employees on the RA request processing protocol and redirect resources to the HRSA RA Program to process new RA requests.	Yes		
09/30/2020	Expand benchmarking within RAPT System to track the effect of non-responsiveness among supervisors.	Yes		
09/30/2020	Conduct a comprehensive assessment using RAPT System benchmarking of the supervisory non-responsiveness to identify additional barriers and improve processing times.	Yes		
09/30/2020	Report findings and recommendations for corrective actions to leadership for Agency-wide implementation.	Yes		
01/31/2021	Use HRSA intranet to report key aggregate RA data	Yes		

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
	including RA processing timeframes and responsiveness			
03/30/2021	Determine the feasibility of requiring all managers and supervisors, including supervisory team leaders, to undergo routine reasonable accommodations training, and make necessary recommendations to Agency Head.	Yes		
09/30/2021	Implement stated recommendation(s) per the direction of Agency Head.	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments
2017	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 percent 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 percent 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.

	<p>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.</p> <p>The policy itself was repeatedly refined over time as it was bargained with the Agency’s union (the National Treasury 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.</p> <p>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 FY 2018.</p>
<p>2018</p>	<p>In FY 2018, HRSA significantly improved RA case processing times. Specifically, the Agency processed a total of 238 cases in FY 2018. Fifty-eight percent (139) of HRSA’s RA cases were decided within Agency timeline of 15 business days. On average, clients received decisions in 19.0 days. HRSA approved 63.9 percent (152) of the cases</p>

	<p>processed and, of those, 83.6 percent (127) were provided within Agency timeline of 30 business days. On average, clients received approved accommodations within 12.6 days of the decision. When looking at the overall RA process, total case processing averaged 27.0 days with 80.7 percent (192) of all case processing completed within the Agency timeline of 45 business days. Whereas HRSA processed 32 percent of its cases timely in FY 2017, the improved processing timeframes in FY 2018 reflect a 153 percent increase in the number of RA cases that were processed in a timely manner over the course of a single fiscal year.</p>
<p style="text-align: center;">2019</p>	<p>In FY 2019, the Agency focused on timely decision making among managers through 1) continued RA training, 2) the implementation of a revised escalation plan outlining the steps to take to address unresponsive managers/supervisors, and 3) the use of DIP meetings to address responsiveness. However, case analysis shows that HRSA supervisors remain slow to respond to RA requests, require reminders to respond, or request extensions to respond. As an example, markers built into the RAPTS system and used by the Accessibility Specialists when a reminder is issued, show that 30 cases required multiple formal (i.e., email) reminders with 11 of those requiring further escalation to include an up-line manager. The reminder rate for informal reminders (i.e., phone calls which are also tracked) is higher. Benchmarking this (and similar) data within the process has proved the most effective way to track processing times for improvement.</p> <p>In response to these trends, HRSA will 1) draft an SOP on case escalation, 2) develop a plan for addition markers and/or reporting on supervisory response time, 3) conduct RA analysis based on case complexity to determine additional factors which impact processing, and 4) develop a short form training for managers and supervisors to bring more management officials into compliance with RA training. Additionally, the Agency will use the HRSA intranet to report key aggregate RA data to include Bureau/Office average processing timeframes and responsiveness.</p>

MD-715 – PART H.2
AGENCY EEO PLAN TO ATTAIN THE ESSENTIAL ELEMENTS OF A MODEL EEO PROGRAM

Please describe the status of each plan that the agency has implemented to correct deficiencies in the EEO program.

If the agency did not address any deficiencies during the reporting period, please check the box.

Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
	To ensure equal employment opportunity, the Agency does not evaluate managers and supervisors on specific efforts to:
C.3.b.1	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings. [see MD-110, Ch. 3.I]
C.3.b.2	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators. [see 29 CFR §1614.102(b)(6)]
C.3.b.3	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation. [see MD-715, II(C)]
C.3.b.4	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees. [see MD-715 Instructions, Sec. I]
C.3.b.5	Provide religious accommodations when such accommodations do not cause an undue hardship. [see 29 CFR §1614.102(a)(7)]
C.3.b.6	Provide disability accommodations when such accommodations do not cause an undue hardship. [see 29 CFR §1614.102(a)(8)]
C.3.b.7	Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
07/01/2019	Establish a method to better rate managers and supervisors on their efforts to ensure EEO.	09/30/2020		
09/30/2020	Ensure managers and supervisors are fully rated on their commitment to EEO.	01/31/2021		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director; HRSA Diversity and Inclusion Council Co-chair	Anthony F. Archeval	No
HR Director; HRSA Diversity and Inclusion Council Co-chair	Catherine Ganey	No
Chief Operating Officer	Wendy Ponton	No
HRSA Administrator	Thomas J. Engels	No

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2019	Explore the feasibility of revising existing performance standards to better rate managers and supervisors on their efforts to ensure EEO.	Yes		09/30/2019
04/01/2020	Fully support HHS' efforts to devise a detailed set of standards to replace the existing measures.	Yes	05/31/2020	
09/30/2020	Ensure HRSA rating officials participate in the HHS briefing on the new EEO performance standards.	Yes	09/30/2020	

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
12/31/2020	Remind rating officials of the EEO rating requirement during the establishment of FY 2021 performance plans.	Yes	09/30/2020	
01/31/2021	Rate 100 percent of managers and supervisors on their commitment to EEO as prescribed in MD-715.	Yes	09/31/2021	

Report of Accomplishments

Fiscal Year	Accomplishments
2019	<p>After several discussions between OCRDI and OHR, the Agency determined that it was not feasible to establish new performance measures that would fully rate managers/supervisors on their commitment to EEO; however, the Agency decided to devise a guide sheet that educates rating officials on activities that should be taken into account when using the existing EEO performance standard to rate managers/supervisors. As a result, the OCRDI MD-715 Workgroup was charged with developing an objective set of factors that the rater would use to review managers/supervisors' full commitment to EEO.</p> <p>Simultaneously, the OCRDI Director was engaged in several meetings with the HHS EEO Director as well as other OpDiv EEO Directors in which it became apparent that this program deficiency was present in several HHS OpDivs. As a result, the deficiency was deemed an HHS EEO Director's priority. This paved the way for the HHS EEO Director to lead the efforts to establish new EEO performance standards with HHS-wide implementation, thus halting the work of the OCRDI MD-715 Workgroup in support of full participation at the HHS-level.</p> <p>Per routine communication with the HHS EEO Director, the new performance measures will be anticipated by the end of the FY 2020 reporting period with HHS-wide implementation occurring in FY 2021. HRSA will continue to support HHS and will comply with the new performance rating requirements, thus eliminating this program deficiency.</p>

	Accomplishments and/or plan modifications will be highlighted in the FY 2020 MD-715 Report.
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MD-715 – PART I
AGENCY EEO PLAN TO ELIMINATE IDENTIFIED BARRIER

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

If the agency did not conduct barrier analysis during the reporting period, please check the box.

Statement of Condition That Was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Federal Employee Viewpoint Survey MD-715 Workforce Data tables		<p>In 2017, the Office of Civil Rights, Diversity and Inclusion (OCRDI) conducted a workforce analysis to detect conditions that may potentially limit employment opportunities for women at HRSA, and to inform the future HRSA Federal Women’s Program (FWP). OCRDI identified several areas of concern, or triggers, for female employees at HRSA, including:</p> <ul style="list-style-type: none"> • Black, Asian, and American Indian/Alaska Native females had less than expected rates in Senior Executive positions (SES); • White and Hispanic females had less than expected application and hiring rates compared to the Civilian Labor Force (CLF); • While White female representation increases as supervisory/senior grade levels increase, Hispanic and Black female representation decreases as supervisory/senior grade levels increase; • Asian and American Indian/Alaska Native (AI/AN) representation is low for mid-level (GS-13 & GS-14) managerial positions; and • All female race/national origin groups’ New Inclusion Quotient (IQ) Index and Employee Engagement Index (EEI) scores are below HRSA goals.

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger

EEO Group(s) Affected by Trigger

EEO Group	
All Men	
All Women	X
Hispanic or Latino Males	
Hispanic or Latino Females	
White Males	
White Females	
Black or African American Males	
Black or African American Females	
Asian Males	
Asian Females	
Native Hawaiian or Other Pacific Islander Males	
Native Hawaiian or Other Pacific Islander Females	
American Indian or Alaska Native Males	
American Indian or Alaska Native Females	
Two or More Races Males	
Two or More Races Females	

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Participation rates in the overall workforce, mission critical occupations and senior level

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
		positions; new hire and separation rates; awards and promotions data. Data was assessed in the aggregate as well as by race/national origin and gender.
Complaint Data (Trends)	Yes	Number of EEO cases filed by women at HRSA and the most alleged bases of discrimination and issues by race/national origin and gender.
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	Findings from the EEO process
Climate Assessment Survey (e.g., FEVS)	Yes	New Inclusion Quotient and Employee Engagement Index scores
Exit Interview Data	pending	This review will occur in FY 2020
Focus Groups	pending	This review will occur in FY 2020
Interviews	pending	This review will occur in FY 2020
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)		
Other (Please Describe)		

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No	

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
N/A as barrier analysis is underway.

Objective(s) and Dates for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Conduct a needs assessment and barrier analysis of women's employment at HRSA	10/01/2018	09/30/2020	Yes	06/30/2021	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Anthony F. Archeval	Yes
Federal Women's Program Manager	Jacqueline E. Calix	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
10/31/2017	Conduct preliminary analysis of women's employment at HRSA and inform key stakeholders of identified triggers		10/31/2017
09/30/2017	Develop needs assessment and barrier analysis plan		09/07/2017
03/01/2018	Implement plan		02/05/2018
03/31/2018	Conduct two conversations with women at headquarters and in the regional offices	04/30/2018	04/20/2018
01/28/2019	Conduct HRSA-Wide FWP Survey		02/26/2019
06/30/2019	Brief Key Stakeholders on FWP Survey Findings	06/30/2020	
09/30/2019	Implement easy-to-accomplish tasks in the FWP	09/30/2020	
12/31/2019	Conduct focus groups	12/31/2020	

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
12/31/2019	Conduct key informant interviews	12/31/2020	
02/01/2020	Analyze all data and determine whether barriers exist	03/30/2021	
03/01/2020	Report findings to senior leadership and recommended corrective actions should barriers exist	06/30/2021	

Report of Accomplishments

Fiscal Year	Accomplishments
2019	<p>HRSA relaunched its Federal Women’s Program (FWP) in FY 2018 to align with Executive Order 11478, which mandated that departments and agencies take affirmative steps to promote employment opportunities among protected groups. A fundamental aspect of the FWP is to identify and eliminate barriers to recruitment, hiring and advancement of women in the workplace. Therefore, in FY 2018, HRSA’s FWP conducted a workforce analysis of HRSA women’s demographics, applicant data, EVS survey, and other data sources. This workforce analysis was done to detect the presence of triggers associated with policies, procedures, practices, or conditions that may potentially limit employment and advancement opportunities for women as a whole and/or specific segments of the female workforce. This preliminary analysis revealed conditions that may indicate barriers for HRSA female employees, requiring additional study to determine whether employment barrier(s) exist.</p> <p>As a result of the findings, OCRDI enlisted the research expertise of the Office of Planning, Analysis and Evaluation (OPAE) and technical advisement from the Office of Women’s Health (OWH) to develop and implement a program needs assessment to determine the focus areas of the FWP as well as a barrier analysis to assist in determining whether employment barriers exist among women at HRSA. Data collection started in April 2018 with an invitation-only conversation with women at headquarters and in the regions. In FY 2019, HRSA continued its multi-year Federal Women’s Program needs assessment and barrier analysis. Specifically, the Agency focused its efforts on validating the findings of the April 2018 invitation-only conversation with women at headquarters and in the regions as well as offering an opportunity for women to provide suggestions for FWP focus areas. In doing so, HRSA invited all women (coded as female in Business Intelligence Information System) to participate in a</p>

	<p>10-minute survey to gain a deeper understanding of their experiences and needs associated with 1) work-life supports, 2) career development, and 3) diversity and inclusion. Fifty-five percent of HRSA women participated in the survey. The internal principal players (OCRDI, OWH, and OPAE) were briefed on the findings in which actions for rapid success were noted. In particular, over 200 women indicated that they would like to participate in the HRSA Mentoring Now Program as a mentor and/or mentee. The Federal Women’s Program Manager notified HLI of the interested parties for further action. Also, HRSA women noted that they were interested in participating in a women-focused employee resource group. The Agency has had substantive conversations with the Federal Women’s Program Manager and the Director of the Office of Women’s Health to determine the feasibility, purpose and goals of a women-focused ERG at the Agency. Discussions regarding the ERG will continue in FY 2020 with high expectations for establishment. Additionally, a HRSA-wide briefing of the FWP needs assessment survey findings and next steps will commence in FY 2020. Progress will be reported in subsequent MD-715 reports.</p>
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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 percent 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 | No X |
| b. Cluster GS-11 to SES (PWD) | Yes X | No |

HRSA has a trigger involving PWDs in grade cluster GS-11 to SES within the permanent workforce. In FY 2019, the percentage of PWDs in cluster GS-11 to SES was 9.54 percent which is below the 12 percent 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 percent 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 X | No |
| b. Cluster GS-11 to SES (PWTD) | Yes X | No |

HRSA has triggers involving PWTDs in both grade clusters within the permanent workforce. In FY 2019, the percentage of PWTDs was 0.65 percent in the GS-1 to GS-10 cluster and 1.95 percent in the GS-11 to SES cluster which are below the 2 percent benchmark.

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 1) DIP meetings with bureau/office leadership, 2) senior staff meetings, 3) Diversity and Inclusion Council meetings, 4) and Council on Employees with Disabilities formal meetings, and 5) 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.

PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

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

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 PWTD	HR			1	Chris Parker, Director, OHR Operations Division
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			Katherine Slye-Griffin, Reasonable Accommodations Manager
Section 508 Compliance	OIT			1	Lauren Taylor, IT Specialist
Architectural Barriers Act Compliance	EEO	1			Katherine Slye-Griffin, Reasonable Accommodations Manager
Special Emphasis Program for PWD and PWTD	EEO			1	B. Winona Chestnut, Disability Employment Program Manager

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

- ADA Mid-Atlantic Conference
 - Barrier Analysis
 - COR Training
 - Disability Program Manager Training
 - 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)

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

3. 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 individual is primarily responsible for recruiting individuals with a disability through direct and indirect contact. Additionally, human resources personnel are available to consult with persons with disabilities at various career fairs.

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.

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.

HRSA follows the OPM guidance on appropriate Schedule A letters to determine applicants’ eligibility. When eligible Schedule A applicants apply to HRSA’s Government-wide job vacancy announcements, qualified applicants are forwarded to hiring officials via a USA Staffing Certificate of non-competitive eligible applicants. Additionally, 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.

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

While the Agency has offered training on special hiring authorities, it is not mandatory for hiring officials to participate as most hiring officials receive training one-on-one or in a group as appropriate. Additionally, OHR holds pre-hire consultations with all hiring managers in which the use of special hiring authorities is discussed.

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-serv of disability serving institutions and utilizes that list-serv 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 percent for PWD and 2 percent 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 <input checked="" type="checkbox"/> | No |
| b. New Hires for Permanent Workforce (PWTD) | Yes <input checked="" type="checkbox"/> | No |

Using the goal of 12 percent as a benchmark, HRSA has a trigger involving PWDs among new hires in the permanent workforce which had a new hire rate of 10.91 percent in FY 2019.

And, using the goal of 2 percent as a benchmark, HRSA has a trigger involving PWTDs among new hires in the permanent workforce which had a new hire rate of 0.91 percent in FY 2019.

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 | No <input checked="" type="checkbox"/> |
| b. New Hires for MCO (PWTD) | Yes <input checked="" type="checkbox"/> | No |

Using the qualified applicant pool of 4.79 percent as a benchmark, a trigger exists among PWTDs in 0685 positions, the Agency's most populous MCO, as no PWTDs were hired in FY2019.

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 | No <input checked="" type="checkbox"/> |
| b. Qualified Applicants for MCO (PWTD) | Yes <input checked="" type="checkbox"/> | No |

Utilizing HRSA's relevant applicant pool of 4.57 percent as the benchmark, the Agency identified triggers for PWTDS among qualified internal applicants for the top two most populous MCOs, 0685 (2.63 percent) and 0343 (0 percent).

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 | No X |
| b. Promotions for MCO (PWTD) | Yes X | No |

Utilizing HRSA's qualified applicant pool of 4.79 percent as the benchmark, the Agency identified triggers for PWTDS among employees promoted to in the Agency's top two most populous mission-critical occupations in FY 2019. There were no promotions among PWTDS in MCO series 0343, and 2.63 percent of the qualified applicant pool of PWTDS were promoted in MCO 0685 in FY 2019.

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 PWDs 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 PWDs 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 PWDs.

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 2019: Mid-Level Development Program (MLDP), Senior Leadership Fellows Program (SLFP), and the Administrative Professionals Career Enhancement Program (APCEP).

Mid-Level Development 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.

Senior Leader Fellowship Program (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 Administrative Professionals Career Enhancement Program (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.

In addition to the three formal career development programs, HRSA offered the Mentoring Now Program and the implementation of Individual Development Plans (IDPs) during this reporting period. 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.

Lastly, HRSA employees seek guidance from their supervisors in the development of Individual Development Plans (IDPs). IDPs usually consist of a wide array of development opportunities that span the scope of the Agency's formal career development programs. IDPs are individually-tailored action plans that are used to develop specific competencies (knowledge and skills) needed to improve current performance or to prepare for new responsibilities. These plans are used to invest in long term self-development while accomplishing important day-to-day work.

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	Unavailable	Unavailable	Unavailable	Unavailable	Unavailable	Unavailable
Fellowship Programs	33	21	6.06%	4.76%	0%	0%
Mentoring Programs	248	248	4.03 %	4.03%	0%	0%
Coaching Programs	119	63	10.92%	12.69%	0.84%	0%
Training Programs	89	42	12.36%	16.67%	1.12%	0%
Detail Programs	Unavailable	Unavailable	Unavailable	Unavailable	Unavailable	Unavailable

Other Career Development Programs	N/A	N/A	N/A	N/A	N/A	N/A
-----------------------------------	-----	-----	-----	-----	-----	-----

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 No **X**
- b. Selections (PWD) Yes No **X**

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 (PWTD) Yes **X** No
- b. Selections (PWTD) Yes **X** No

Using HRSA’s relevant applicant pool for applicants and/or selectees as a benchmark, triggers exist involving PWTDs among applicants and selectees for career development programs at HRSA in FY2019. PWTDs comprised 0.84 percent of the qualified applicants and none of the selections.

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
- b. Awards, Bonuses, & Incentives (PWTD) Yes **X** No

Using the inclusion rate of 9.82 percent as a benchmark, HRSA has triggers involving PWDs receiving time-off awards between 1-10 hours (9.16 percent) and 31-40 (7.50 percent) hours as well as cash awards in all categories except in the dollar amount range of \$1000-\$1999 (10.06 percent). Further, using the inclusion rate of 1.85 percent for PWTDs as a benchmark, HRSA has triggers involving the distribution of time-off awards in each category and the awarding of cash awards in the dollar ranges of \$500-\$999 (0.89 percent) and \$2000-\$2999 (1.79 percent).

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
- b. Pay Increases (PWTD) Yes **X** No

Using the inclusion rate of 9.82 percent for PWDs and 1.85 percent for PWTDs as benchmarks, HRSA has triggers involving the distribution of QSIs and performance-based pay increases. In FY 2019, PWDs (7.66 percent) and PWTDs (1.35 percent) received QSIs below their respective inclusion rates. Performance-based pay increases among PWDs (6.90 percent) and PWTDs (0 percent) were also below their respective inclusion rates.

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	N/A X
b. Other Types of Recognition (PWTD)	Yes 0	No 0	N/A X

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

b. Grade GS-15

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

c. Grade GS-14

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

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 of 6.55 percent for qualified internal applicants as the benchmark, HRSA identified triggers among PWDs for qualified internal applicants and selectees for promotions to the GS-13 level, as there were no PWDs among the qualified internal applicants and subsequent selectees.

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 | No X |
| ii. Internal Selections (PWTD) | Yes | No X |

b. Grade GS-15

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

c. Grade GS-14

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

d. Grade GS-13

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

Utilizing the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees as the benchmark (6.55 percent), HRSA identified triggers among PWTDs for qualified internal applicants and selectees for promotions to the senior grade levels GS-13 and GS-15, as there were no PWTDs in the applicant and subsequent selection pools.

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 | No | N/A X |
| b. New Hires to GS-15 (PWD) | Yes | No X | |
| c. New Hires to GS-14 (PWD) | Yes | No X | |
| d. New Hires to GS-13 (PWD) | Yes | No X | |

Despite having new SES hires in FY 2019, applicant pool data is unavailable. Therefore, HRSA is not able to determine whether a trigger exists for PWDs hired into SES.

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 | No | N/A X |
| b. New Hires to GS-15 (PWTD) | Yes | No X | |
| c. New Hires to GS-14 (PWTD) | Yes | No X | |
| d. New Hires to GS-13 (PWTD) | Yes | No X | |

Despite having new SES hires in FY 2019, applicant pool data is unavailable. Therefore, HRSA is not able to determine whether a trigger exists for PWTDs hired into SES.

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 | No X |
| ii. Internal Selections (PWD) | Yes | No X |

b. Managers

- | | | |
|--|--------------|-------------|
| i. Qualified Internal Applicants (PWD) | Yes X | No |
| ii. Internal Selections (PWD) | Yes | No X |

c. Supervisors

- | | | |
|--|-----|-------------|
| i. Qualified Internal Applicants (PWD) | Yes | No X |
| ii. Internal Selections (PWD) | Yes | No X |

Using the relevant applicant pool of 4.88 percent as a benchmark, HRSA has a trigger involving PWDs as this group was below the qualified applicant pool for promotions to managers in FY 2019.

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 No **X**
- ii. Internal Selections (PWTD) Yes No **X**

b. Managers

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

c. Supervisors

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

Utilizing the relevant applicant pool for qualified internal applicants of 4.88 percent as the benchmark, HRSA has a trigger involving PWTDs as they were not among the qualified internal applicants and/or selectees for promotions to supervisory positions.

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 0 No **X**
- b. New Hires for Managers (PWD) Yes 0 No **X**
- c. New Hires for Supervisors (PWD) Yes 0 No **X**

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.

- a. New Hires for Executives (PWTD) Yes No **X**
- b. New Hires for Managers (PWTD) Yes **X** No
- c. New Hires for Supervisors (PWTD) Yes **X** No

Utilizing the qualified applicant pool of 4.79 percent as a benchmark, HRSA has a trigger involving PWTDs for new hires for managerial and supervisory positions as no PWTDs were among the FY 2019 selectees.

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 **X** No 0 N/A 0

All Schedule A employees eligible for conversion in FY 2019 were converted into the competitive service with the exception of one employee whose conversion was delayed until October 2019.

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 PWDs and PWTDs in FY 2019.

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 headquarters and regional offices are located in privately owned buildings which are governed by ADA. Accordingly, no ABA notice is posted on the 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.

HRSA, through the work of OCRDI, will continue to:

- include Section 508 requirements in its RA Trainings for Managers and Supervisors, RA Training for Employees, and New Employee Orientation.
- work collaboratively with HRSA's 508 Team in OIT to track Section 508 complaints and work to provide immediate, alternative options in circumstances where a system is not fully accessible.
- provide technical assistance to HRSA Bureaus and Offices to ensure equal access for persons with disabilities.
- review building plans for compliance with 2010 DOJ ADA Standards on an as-needed basis. In FY 2019, OCRDI consulted on plans for a regional office that is under construction where patients would be regularly seen and treated by Agency medical providers. Additionally, OCRDI staff completed four in-person physical accessibility reviews of regional offices.

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.)

Processing Standard	Internal Benchmark	2018 Outcome	2019 Outcome
Total cases processed.	None	238	235
Total cases approved.	None	63.9% (152)	77.0% (181)
Days to issue a decision to the client (measured from date of request).	15 business days. No specific EEOC mandate. Determined by HRSA policy.	19.0 days on average; 58.4% (139) issued within timelines.	29.2 days on average; 40.9% (96) issued within timelines.
Days to provide approved RAs (measured from date of issued decision).	30 business days. No specific EEOC mandate. Determined by HRSA policy.	12.6 days on average; 83.6% (127) provided within timelines.	6.3 days on average; 58.6% (106) provided within timelines.
Total case processing time (measured from date of request to the date of the final action for the case – e.g., denial or RA provision).	45 business days. No specific EEOC mandate. Determined by HRSA policy. The former EEOC requirement was that 90% of cases must be processed within the Agency timeframes.	27.0 days on average; 80.7% (192) provided within timelines.	32.7 days on average; 63.8% (150) provided within timelines.

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. Over the years, HRSA has focused on accommodation solution effectiveness during the interactive process. Multiple employees continue to comment that their accommodations have improved their work environments and allowed them to engage successfully in their work. However, timeliness remains a critical goal for the program. Case analysis shows that HRSA supervisors remain slow to respond to RA requests, require reminders to respond, or request extensions to respond. As an example, markers built into the RAPTS system and used by the Accessibility Specialists when a reminder is issued, show that 30 cases required multiple formal (i.e., email) reminders with 11 of those requiring further escalation to include an up-line manager. The reminder rate for informal reminders (i.e., phone calls which are also tracked) is higher. Benchmarking this (and similar) data within the process has proved the most effective way to track processing times for improvement.

Such data is also able to be used to make a business case for supervisory training which remains the key strategy for creating a responsive RA process. HRSA has a multifaceted RA training program with two new employee orientation trainings (one live for all new employees and one pre-recorded online video), two supervisory trainings, one employee training, and specialized trainings which are available upon request. When all parties within the RA process have been trained, Accessibility Specialists report greater success facilitating the interactive process and bringing cases to successful closure.

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.

HRSA has one employee who is eligible for PAS services. The employee used the service in FY 2019 and reported no problems. As with other disability services, the program is monitored through quarterly reviews, which include client check-ins and data analysis on request processing and service provision. Based on the data collected, the program is fully effective as all request processing and service provision was 100 percent timely. Further, the client reports being fully satisfied with the services received.

Regarding 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.

Section VI: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the government-wide average?
Yes **X** No N/A
2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?
Yes **X** No N/A
3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

There were no findings of discrimination alleging harassment based on disability during the last fiscal year.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?
Yes **X** No N/A
2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?
Yes **X** No 0 N/A 0
3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

There were no findings of discrimination involving failure to provide reasonable accommodation during the last fiscal year.

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 No **X**
2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?
Yes No N/A **X**
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				
Barrier(s)	N/A			
Objective(s)				
Responsible Official(s)				
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
Fiscal Year	Accomplishments			
2019	The Agency recognizes that a thorough barrier analysis has not been performed on the Disability Employment Program in a number of years. As a result, the Agency is exploring the feasibility of conducting barrier analysis in FY 2021 to determine whether the barriers that were identified in previous MD-715 reports remain relevant and/or whether new barriers should be noted and eliminated. Outcomes will be highlighted in subsequent MD-715 reports.			

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 0 No 0 N/A 0

N/A

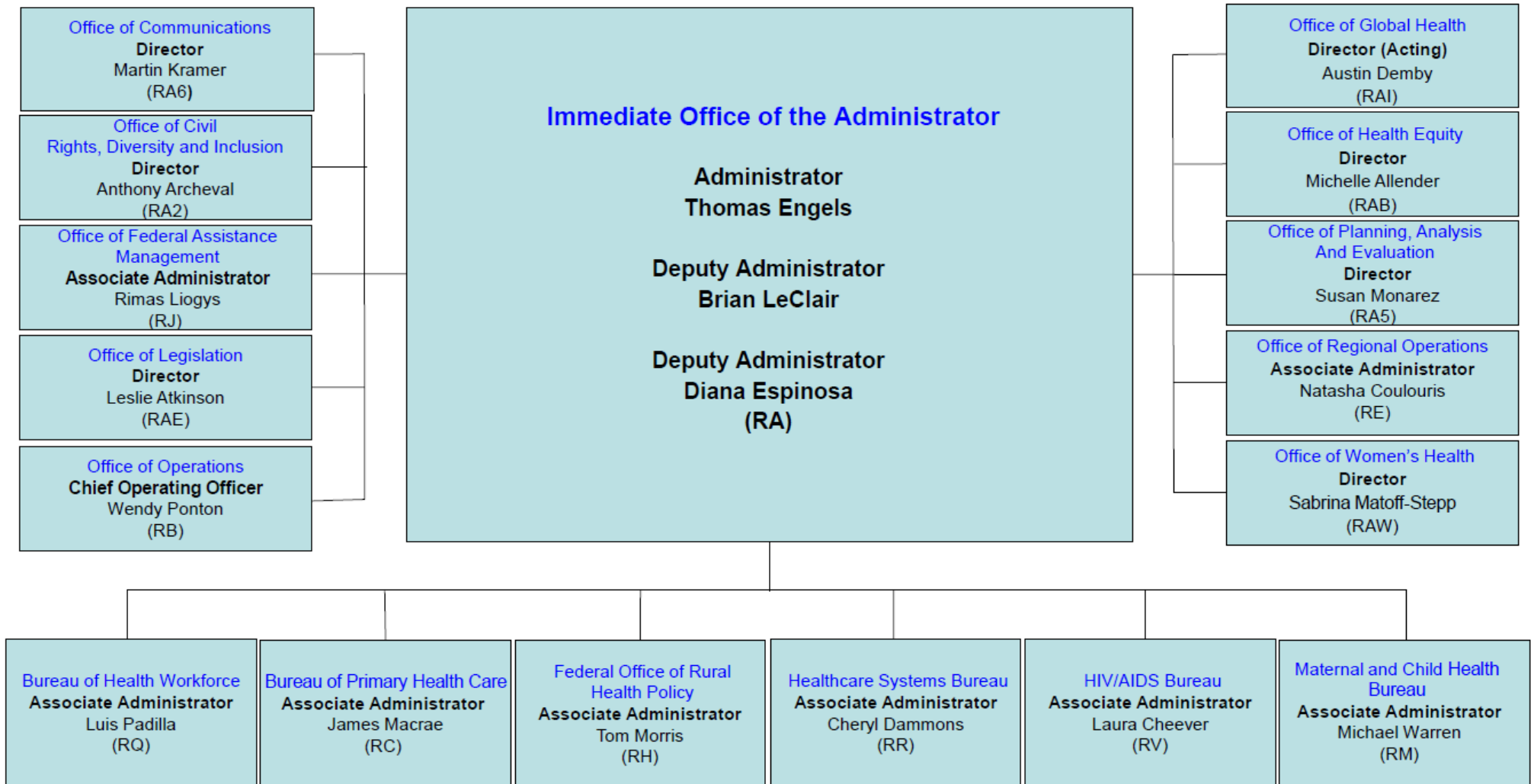
5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

N/A

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.

N/A

Health Resources and Services Administration



Last Updated: 11/26/2019



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's 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 accommodations 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 [EEO Complaint Process Program](#) 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, (301) 443-5636, or eeocomplaints@hrsa.gov. The regulations governing the Federal Sector 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, 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.

HRSA's 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.

APPENDIX B: HRSA EEO AND ANTI-HARASSMENT POLICY STATEMENTS

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

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 for employment, contract employees, clients, customers, and anyone conducting 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 who will investigate the matter and take immediate and appropriate 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, OHR staff, or the Office of the General Counsel when addressing issues of discrimination, retaliation, or harassment.

10/10/2019
Date

/Thomas J. Engels/
Tom Engels, Acting Administrator

APPENDIX

Related Laws, Executive Orders, and Resources:

Title VII of the Civil Rights Act of 1964: <https://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>

Processing Complaints of Discrimination by Lesbian, Gay, Bisexual, and Transgender (LGBT)
Federal Employees: https://www.eeoc.gov/federal/directives/lgbt_complaint_processing.cfm

HRSA's Handling Workplace Harassment Policy:
<https://sharepoint.hrsa.gov/oo/ohr/SitePages/Work%20Place%20Issues.aspx>

**APPENDIX C: HRSA POLICY STATEMENTS ON NOTIFICATION AND FEDERAL EMPLOYEE
ANTIDISCRIMINATION AND RETALIATION ACT OF 2002,
AND ON WORKFORCE DIVERSITY AND INCLUSION**



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 provide 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 C: HRSA POLICY STATEMENTS ON NOTIFICATION AND FEDERAL EMPLOYEE
ANTIDISCRIMINATION AND RETALIATION ACT OF 2002,
AND ON WORKFORCE DIVERSITY AND INCLUSION**

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 employment 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 C: HRSA POLICY STATEMENTS ON NOTIFICATION AND FEDERAL EMPLOYEE
ANTIDISCRIMINATION AND RETALIATION ACT OF 2002,
AND ON WORKFORCE DIVERSITY AND INCLUSION**

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 (OCRDI), or the Office of Human Resources (OHR). 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 for employment under the laws of the United States, including the provisions of law specified in 5 U.S.C. 2302(d).

10/10/2019
Date

/Thomas J. Engels/
Tom Engels, Acting Administrator

**APPENDIX C: HRSA POLICY STATEMENTS ON NOTIFICATION AND FEDERAL EMPLOYEE
ANTIDISCRIMINATION AND RETALIATION ACT OF 2002,
AND ON WORKFORCE DIVERSITY AND INCLUSION**



DEPARTMENT OF HEALTH & HUMAN SERVICES

Health Resources and Services
Administration

Rockville MD 20857

**HEALTH RESOURCES AND SERVICES ADMINISTRATION
POLICY STATEMENT
ON
WORKFORCE DIVERSITY AND INCLUSION**

The Health Resources and Services Administration (HRSA) is committed to promoting diversity and inclusion in the workplace as it accomplishes its mission to improve health outcomes and address health disparities through access to quality services, a skilled health workforce, and innovative, high-value programs.

We define diversity as all the ways in which people differ, including but not limited to age, race, ethnicity, national origin, gender, gender identity, sex, sexual orientation, mental or physical abilities, primary language, education, socioeconomic status, religion, work experience, cultural values, geographic location, family status, organizational level, work style, philosophical views, veteran status, and intellectual perspectives.

Inclusion is the process of enabling the full participation and contribution of all human resources in support of the mission of the organization by eliminating implicit and explicit barriers to engagement in every aspect of work-life and operations. Leveraging the diverse talents and attributes of the entire workforce will empower the full potential of all employees and contribute significantly to achieving the HRSA mission. This can be accomplished by ensuring fairness when configuring work opportunities, business processes, functional operations, rewards systems, work-life balance options, professional interactions, communications, information sharing, and decision-making.

We strive to attract, recruit, retain and develop a workforce that is expansive along many dimensions, and to leverage the diverse knowledge and experiences of all our employees. Managers, supervisors, and employees share HRSA's commitment to diversity and inclusion throughout the Agency. This includes increasing employment and advancement opportunities for groups that are underrepresented in the workforce by (1) actively incorporating innovative methods to improve our outreach efforts and (2) creating a workplace culture that ensures fairness in the selection of individuals for career development programs and promotional opportunities.

This policy statement aims to leverage a well-managed, diverse and inclusive workforce. Embracing this policy statement will improve our organizational efficiency and effectiveness and create a culture of innovation, opportunity, and success within HRSA that capitalizes on our diverse workforce, ultimately delivering value to our stakeholders.

10/10/2019

Date

/Thomas J. Engels/

Tom Engels, Acting Administrator

APPENDIX D: HHS PART H ACTION PLAN OUTLINE

Type of Program Divisions: **A.3**

Brief description of Program Deficiency: **Agency assesses and ensures EEO principles are part of its culture**

Objectives and Dates for EEO Plans

Date Initiated	Target Date	Modify Date	Completion Date	Objective Description	Actions
8/2019	9/2019		9/2019	Draft EEO Policy Statement	- Draft EEO Policy Statement
9/2019	10/2019		9/2019	Initiate HHS leadership approval	- Submit to ASA through correspondence process
10/2019	Present	Continuous	10/2020	Obtain approval and revise, if necessary	- Move EEO Policy Statement through correspondence process - Modification: Regularly inquiry about status
TBD				Issue EEO Policy Statement	

APPENDIX D: HHS PART H ACTION PLAN OUTLINE

Type of Program Divisions: **B.2/B.4**

Brief description of Program Deficiency: **The EEO Director controls all aspects of the EEO program.**

The agency has sufficient budget and staffing to support the success of its EEO program.

Objectives and Dates for EEO Plans

Date Initiated	Target Date	Modify Date	Completion Date	Objective Description	Actions
8/2019	10/2019		9/2019	Assess Final Agency Decision process	<ul style="list-style-type: none"> - Consult with OpDivs - Consult with Crossroads - Consult with OGC
10/2019	11/2019		11/2019	Develop plan for improved processing	<ul style="list-style-type: none"> - Develop plan
11/2019	12/2019		12/2019	Obtain approval and funding	<ul style="list-style-type: none"> - Develop business case justification - Brief ASA - Brief SSF Board
1/2020	6/2020	9/2020		Hire Complaints Adjudication Division Director	<ul style="list-style-type: none"> - Begin and complete recruitment process
9/2020	12/2020			Transition plan	<ul style="list-style-type: none"> - Develop internal processes and templates - Create timeline for additional hires - Create timeline for transition - Develop communications strategy
9/2020	12/2020			Hire additional staff	<ul style="list-style-type: none"> - Begin and complete recruitment process
10/2020	12/2020			Begin transition	<ul style="list-style-type: none"> - Begin drafting some final agency decisions in-house - Announce to OpDivs and customers -
1/2021	1/2021			Implement transition	<ul style="list-style-type: none"> - Transition final agency decision writing completely in-house staff

APPENDIX D: HHS PART H ACTION PLAN OUTLINE

Type of Program Divisions: **C.1**

Brief description of Program Deficiency: **Agency conducts regular internal audits of its component and field offices.**

Objectives and Dates for EEO Plans

Date Initiated	Target Date	Objective Description	Actions
8/2020	10/2020	Hire additional staff	- Initiate/complete recruitment
11/2020	6/2021	Develop auditing program	- Benchmark agencies - Engage OpDivs - Identify elements, methods, create tools, etc. - Begin communication plan/strategy
7/2021	9/2021	HHS leadership approval	- Implement communication strategy - Develop presentation materials - Brief ASA - Brief Deputy Secretary (possibly OpDiv heads) - Brief Executive Officers
10/2021	10/2021	Implement program	- Begin auditing of OpDiv EEO Offices

APPENDIX D: HHS PART H ACTION PLAN OUTLINE

Type of Program Divisions: **C.3**

Brief description of Program Deficiency: **Agency evaluates managers and supervisors on their efforts to ensure equal opportunity.**

Objectives and Dates for EEO Plans

Date Initiated	Target Date	Completion Date	Objective Description	Actions
12/2019	2/2020	2/2020	Improved performance plan accountability for supervisors	- Drafted new performance plan standards for inclusion in all supervisory performance plans
3/2020	12/2020		Coordination with OHR/OCIO to implement new performance plan standards	- Brief ASA on new standards - Collaborate with OHR to include in new performance plan form - Update performance plan systems to incorporate new standards
7/2020	12/2020		Communications strategy	- Develop communications strategy to announce new standards (in coordination with OHR)
1/2021	1/2021		Implement new performance plan standards	- OHR to unveil new performance plan program including, new EEO/D&I related performance standards - EEODI issues compendium
12/2020	5/2021		Supervisory support	- Develop compendium to provide context and meaning to new performance standards
1/2021	Continuous		Supervisory training	- OpDiv EEO Offices train supervisors - Issue compendium

APPENDIX D: HHS PART H ACTION PLAN OUTLINE

Type of Program Divisions: **D.1**

Brief description of Program Deficiency: **Agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.**

Objectives and Dates for EEO Plans

Date Initiated	Target Date	Completion Date	Objective Description	Actions
10/2019	6/2020	6/2020	Coordinated MD-715	- EEO Directors review MD-715 as a group to level set understanding of each requirement and to identify OpDivs that require assistance
10/2019	Continuous		EEO Strategy Council	- Monthly meetings with EEO Directors to discuss EEO and D&I programs and work to resolve as a team - Leverages best practices and coordinated support
10/2019	1/2020	12/2020	EEO and D&I Department Assessment	- Initiate Department wide assessment of the EEO and D&I programs in all OpDivs and Headquarters - Identify themes/trends and recommendations
3/2020	12/2020		Hire Policy/Compliance Specialist, Management Analyst, Recruitment Specialist	- Begun hiring process – delays with COVID; - Requires FY21 funds for Recruitment Specialist
1/2020	3/2020	6/2020	EEO Strategy Council SharePoint	- Develop SharePoint for EEO Directors to easily share best practices and have a secure holding site for them
3/2020	Continuous		EEO and D&I Community of Practice	- Establish EEO and D&I Community of Practice for all Department EEO and D&I staffs - Improve collaboration – break down silos to share best practices and address common concerns, etc.
10/2020	Continuous		Quarterly MD-715 Reviews	- Continue coordinated review of MD-715 on a quarterly basis - Will include discussion on progression of Part H plans and identification of any new barriers/obstacles
12/2021	3/2022		In-Depth MD-715 Analysis	- Based on updated ERI data and resurvey of the workforce, perform an in-depth analysis of barriers/obstacles - Revise Strategic Plan and other activities as necessary
1/2021	12/2021		Policy Assessment	- Create matrix of EEO and D&I policies throughout Department and OpDivs

APPENDIX D: HHS PART H ACTION PLAN OUTLINE

Date Initiated	Target Date	Completion Date	Objective Description	Actions
				<ul style="list-style-type: none"> - Review and identify best practices to share with OpDivs - Develop and update policies and job aids, as needed
10/2021	10/2021		Implement Audit Program	<ul style="list-style-type: none"> - See Part H plan for C.1

APPENDIX D: HHS PART H ACTION PLAN OUTLINE

Type of Program Divisions: **D.2/D.3/D.4**

Brief description of Program Deficiency: **Agency identifies areas where barriers may exclude EEO groups.**

Agency established appropriate actions plans to remove identified barriers.

Agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.

Objectives and Dates for EEO Plans

Date Initiated	Target Date	Completion Date	Objective Description	Actions
1/2020	1/2020	1/2020	Develop Department wide competency in Barrier Analysis	<ul style="list-style-type: none"> - Identify Barrier Analysis points of contact - Coordinate and implement BA training (from EEOC)
04/2020	11/2020		Collect Barrier Analysis Information	<ul style="list-style-type: none"> - Collaborate with OBM&T to Identify best practices used by internal and external agencies - Identify sources of information (such as, grievances, EEO complaints, leadership training programs) and establish contacts - Identify Department-wide POCs in OHR and OCIO to support - Collect and organize internal tools, processes, job aids, checklists, etc.
9/2020	12/2020		Data Analytics Function	<ul style="list-style-type: none"> - Requires FY21 funds: Hire data analytics staff member
12/2020	10/2021		Barrier Analysis Community of Practice (CoP)	<ul style="list-style-type: none"> - Meets and assesses collected information - Develops Barrier Analysis Tool Kit to improve lower performing Operating Divisions capability
10/2021	4/2022		Launch Barrier Analysis Assessment	<ul style="list-style-type: none"> - Perform in-depth review of MD-715 information - Collect new data from re-survey of the workforce with ERI options
4/2022	9/2022		Develop D&I Strategic Plan	<ul style="list-style-type: none"> - Draft D&I Strategic Plan (including plan to educate HHS workforce) - Begin communications strategy development

APPENDIX D: HHS PART H ACTION PLAN OUTLINE

Date Initiated	Target Date	Completion Date	Objective Description	Actions
9/2022	11/2022		HHS Leadership Approval	<ul style="list-style-type: none"> - Develop presentation materials - Brief ASA - Brief Deputy Secretary (possibly OpDiv heads) - Brief Executive Officers
11/2022	12/2022		Implement Communications Strategy	<ul style="list-style-type: none"> - Publish D&I Strategic Plan
1/2023	12/2023		Implement D&I Strategic Plan	<ul style="list-style-type: none"> - Initiate D&I Strategic Plan and begin education program

APPENDIX D: HHS PART H ACTION PLAN OUTLINE

Type of Program Divisions: **E.4**

Brief description of Program Deficiency: **Agency has effective and accurate data collection systems in place to evaluate its EEO program.**

Objectives and Dates for EEO Plans

Date Initiated	Target Date	Completion Date	Objective Description	Actions
5/2020	5/2020	5/2020	Engage OHR and OCIO	- Briefed OHR and OCIO on high-level issues
6/2020	6/2020	6/2020	Plan of Action	- Met with OHR/OCIO and developed plan of action to address changeover in EHCM
7/2020	11/2020		Correction period	- Individual OpDivs work with OHR/OCIO to correct migration errors
7/2020	12/2020		Prepare for Re-Survey of the Workforce	- EEODI work with OHR/OCIO to develop platform for resurvey - EEODI/EEO OpDiv EEO Offices develop communications strategy to encourage employee participation in resurvey - Test platform
9/2020	2/2021		Communications Plan	- Implement communications plan
3/2021	9/2021		Re-Survey of the Workforce	- Initiate Re-Survey of the Workforce

APPENDIX D: HHS PART H ACTION PLAN OUTLINE

Type of Program Divisions: **E.5**

Brief description of Program Deficiency: **Agency identifies and disseminates significant trends and best practices in its EEO program.**

Objectives and Dates for EEO Plans

Date Initiated	Target Date	Objective Description	Actions
3/2020	12/2020	Improve online presence	- Provide various trainings to employee to develop capability
8/2020	9/2020	Benchmark other Federal agencies	- Identify areas - Develop questions - Identify willing Federal agencies to benchmark - Engage and meet with Federal agencies
10/2020	11/2020	Develop method and products	- Compile information - Develop mock up newsletter
12/2020	1/2021	Issue Newsletter	- Develop blast email - Announce to EEO Directors and staff - Meet with XOs
3/2021	12/2021	Develop other methods to improve capability	- TBD