
Management Directive 715

FY 2011

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What Does MD-715 Require?

- Develop and maintain model EEO program
- Ensure all employment decisions are free from discrimination
- Examine employment policies, procedures and practices to identify and remove barriers to equal opportunity
- Develop plans to correct identified barriers
- Report plans and progress to EEOC

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Essential Elements of a Model EEO Program

- Demonstrated commitment from agency leadership
- Integration of EEO into the agency's strategic mission
- Management and program accountability
- Proactive prevention of unlawful discrimination
- Efficiency
- Responsiveness and legal compliance

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Element One: Demonstrated Commitment From Agency Leadership

- Equal employment opportunity must be:
 - Embraced by agency leadership
 - Communicated through the ranks from the top down
- EEO principles must be made a fundamental part of the agency's culture
- Agency head must issue annual EEO and anti-harassment policy statements

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Element One

- Senior leadership participating in the barrier analysis process
- Senior leadership utilizing EEO staff as consultants in their decision-making process
- Providing analytical support to EEO efforts
- Providing centralized funds for reasonable accommodations
- Requirement that components pay their share for the processing complaints that result in settlement or findings
- Ensuring appropriate reporting structure for EEO program

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Element Two: Integration of EEO Into the Agency's Strategic Mission

- EEO Director has regular access to agency head and senior management
- EEO professionals are involved in all major human resources decisions
- EEO programs have sufficient resources
- Managers and employees are involved in the implementation of the agency's Title VII and Rehabilitation Act programs

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Element Two

- EEO Director serving as a part of senior agency staff
- Cross functional teams to work on barrier analysis (include all major players of the organization)
- Action plans (barriers analysis) with meaningful timelines and measures
- Clear business case and strategic plan for EEO/diversity programs

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Element Three: Management and Program Accountability

- Conduct regular internal EEO program audits
- Ensure effective coordination between the agency's EEO office and related agency human resource programs and other management programs
- Evaluate managers and supervisors on efforts to ensure equality of employment opportunity
- Maintain effective reasonable accommodation procedures
- Maintain clearly defined and fair personnel policies, selection and promotion procedures, evaluation procedures, rules of conduct and training systems

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Element Three

- Conducting self-audit of sub/regional components of organization
- Effective coordination between EEO, HR and Legal with emphasis on process improvement
- Leadership development programs that provide effective managerial, communication, and interpersonal skills
- Managers are provided with a clear understanding of their EEO responsibilities

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Element Four: Proactive Prevention of Unlawful Discrimination

- Conduct a self-assessment on at least an annual basis to monitor progress and identify areas where barriers may operate to exclude certain groups
- Develop strategic plans to eliminate identified barriers

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Element Four

- Cultural diversity training for all staff that addresses workplace issues
- Strategic use of Special Emphasis Programs
- Involving all key agency players in the barrier analysis process
- Establishing meaningful and realistic action plans with appropriate official assigned responsibility

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Element Five: Efficiency

- Maintain an efficient, fair and impartial complaint resolution process
- Separate investigation and adjudication functions from the legal defense arm of the agency
- Establish and encourage the widespread use of alternative dispute resolution (ADR)
- Maintain effective data collection systems on workforce, applicant flow and complaint tracking

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Element Five

- Investigation timeframes below 180 days
- Placement of timeliness and quality measures in EEO staff performance plans
- Implementation and use of applicant tracking form to measure effectiveness of recruitment

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Element Six: Responsiveness and Legal Compliance

- Ensure full compliance with Title VII and Rehabilitation Act, including EEOC regulations, orders and other written instructions
- Timely report agency program efforts and accomplishments to EEOC
- Comply with final EEOC orders for corrective action and relief

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Leading the Way

Hispanic Representation FY 2009

Agency	Participation Rate
DHS	19.5
EEOC	14.0
SSA	13.7
DOJ	9.1
Treasury	9.1
HUD	7.2
Air Force	7.1
Army	7.1
DOL	7.1
VA	6.9

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