

***U.S. Army Space and Missile Defense Command
P.O. Box 1500
Huntsville, AL 35807-3801***



ANNUAL EEO PROGRAM STATUS REPORT

FISCAL YEAR 2019

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For period covering October 1, 2017, to September 30, 2018.			
PART A Department or Agency Identifying Information	1. Agency		Department of the Army
	1.a. 2 nd level reporting component		U.S. Army Space and Missile Defense Command
	1.b. 3 rd level reporting component		
	1.c. 4 th level reporting component		
	2. Address		Post Office Box 1500
	3. City, State, Zip Code		Huntsville, AL 35807-3801
	4. Agency Code	5. FIPS Code	ARSC
PART B Total Employment	1. Enter total number of permanent workforce		842
	2. Enter total number of temporary workforce		4
	3. Enter total number employees paid from non-appropriated funds		0
	TOTAL Workforce [add lines]		
PART C.1 Head of Agency and Head of Agency Designee	Agency Leadership		Name & Title
	1. Head of Agency		LTG James H. Dickinson, Commanding General
	2. Head of Agency Designee		
EEO Program Staff		Name, Title, Series, Pay Plan and Grade	
PART C.2 Agency Official(s) Responsible For Oversight of EEO Program(s)	1. Principal EEO Director/Official		Pier R. Poe, NH-0260-03
	2. Affirmative Employment Program Manager		Pier R. Poe, NH-0260-03
	3. Complaint Processing Program Manager		Chanley Pickard, NH-0260-03
	4. Disability Program Manager (SEPM)		Chanley Pickard, NH-0260-03
	5. Other Responsible EEO Staff		
	6.		
	7.		
	8.		

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EEOC FORM 715-01 PART A - D				
For period covering October 1, 2017, to September 30, 2018.				
PART D List of Subordinate Components Covered in This Report	Subordinate Component and Location (City/State)		Agency and FIPS Codes	
	PART D.2 Mandatory and Optional Documents for this Report	Did the agency submit the following documents?		Please respond Yes or No
Organizational Chart		Yes		
462 Report		Yes		
EEO Policy		Yes		
Anti-harassment Policy		Yes		
Disabled Veterans Affirmative Action Plan		Yes		
FEORP		Yes		
Facility Accessibility Surveys		Yes	Copy of survey results submitted in FY2005; no changes since that time.	

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715 - PART E
EXECUTIVE SUMMARY

Organization Information:

The U.S. Army Space and Missile Defense Command (USASMDC) is an Army Service Component Command reporting directly to the Chief of Staff of the Army. The USASMDC conducts space and missile defense operations and provides planning, integration, control, and coordination of Army forces and capabilities, in support of U.S. Strategic Command missions (strategic deterrence and integrated missile defense), as well as U.S. Space Command missions (space operations). USASMDC serves as the Army force modernization proponent for space, high altitude, and global missile defense, serves as the Army operational integrator for global missile defense, and conducts mission-related research and development in support of Army Title 10 responsibilities.

The USASMDC's major elements are located in the U.S. and overseas as follows: Huntsville/Redstone Arsenal, AL; Colorado Springs, CO; and U.S. Army Garrison Kwajalein Atoll/Reagan Test Site, Republic of the Marshall Islands. The Equal Employment Opportunity (EEO) Office is located within the command headquarters at Redstone Arsenal, AL, and is responsible for oversight of the command's overall EEO Program. Under support agreements, host tenants provide EEO operational support for USASMDC employees located at other installations in the U.S. and around the world.

The EEO function supports the command's enduring priority of serving our Soldiers, Civilians, and their Families. To support this priority, EEO assists in the establishment, recruitment, and maintenance of a high quality, diverse workforce, built upon equality of opportunity that reflects the nation's diversity. The USASMDC is committed to ensuring that equality of opportunity is institutionalized as an integral part of its mission. The command makes every effort to prevent any form of discrimination and to remove any barriers to EEO in the workplace. This includes the hiring, advancement, training, and retention of persons with disabilities (PWD), to include providing reasonable accommodations to employees and applicants with disabilities.

This is USASMDC's 13th annual report under EEO Commission (EEOC) Management Directive (MD) 715, as mandated by the EEOC. Within this directive, the EEOC has provided reporting requirements that seek to standardize annual EEO reports and updates. The demographics contained in this report are reflective of USASMDC's mission responsibility involving a workforce dispersed worldwide.

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Statistical information in this report is provided to show the effects of organizational policy on each racial, ethnic, and gender group, including PWD. The generalized comparators are the National Civilian Labor Force (NCLF) statistics and Relevant Civilian Labor Force (RCLF). The report for Fiscal Year (FY) 18 shows NCLF data based on the 2010 Census. As a result of the census, statistical comparators are issued by EEOC, and deviations from their use are prohibited. If an area of underrepresentation is validated, EEOC directives require the development of action items to address the underrepresentation so that it is eliminated. This does not mandate the use of numerical goals and numerical quotas under any circumstance.

Database Information:

Data contained in this report was extracted from the Defense Civilian Personnel Database System (DCPDS) and the Complaints Tracking System (iComplaints). Data reflects all permanent and temporary appropriated funds employees within this command. Due to the broad geographic location of command employees, the NCLF and RCLF statistics are used for comparisons.

Limitations:

Race, ethnicity, and disability information contained within DCPDS is obtained through voluntary employee submissions. Employee perceptions for self-identification on race and ethnicity may not coincide with the standard categories prescribed by the Equal Employment Opportunity Commission (EEOC), the U.S. Census Bureau, or the Office of Personnel Management (OPM). Applicant pool data is not available, Headquarters, Department of the Army is aware of this problem.

Workforce Analyses:

The command's total workforce consisted of 846 full time permanent and temporary employees as of September 30, 2019. This number represents a workforce increase of 1.3 percent in FY19, as compared to FY18. The participation rate of Hispanics, Asians, American Indian females and White females continues to be less than expected compared to their percentage in the NCLF. The participation rates for all other ethnic/racial groups was above or equal to their NCLF participation rate. As shown in Figure 1, there was a negative percent change for White males, Black males, Asians, and Native Hawaiian/Pacific Islander males, while there was no change in the percentage rate of American Indian females and Native Hawaiian/Pacific Islander females.

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Figure 1. Total Workforce by Race/Ethnicity/Gender				
EEO Group	FY18%	FY19 %	% Change	NCLF %
White males	59.6	59.0	-0.6	38.3
White females	13.3	13.7	0.4	34
Black males	6.6	6.3	-0.3	5.4
Black females	7.4	7.9	0.5	6.4
Hispanic males	4.7	4.8	0.1	5.1
Hispanic females	1.3	1.4	0.1	4.8
Asian males	1.4	1.3	-0.1	1.8
Asian females	0.7	0.5	-0.2	1.8
Native Hawaiian or PI males	0.6	0.5	-0.1	0.1
Native Hawaiian or PI females	0.4	0.4	0.0	0.1
American Indian males	0.8	0.9	0.1	0.3
American Indian females	0.1	0.1	0.0	0.3
Two or More Races males	2.0	2.4	0.4	0.8
Two or More Races females	1.0	0.8	-0.2	0.8
Total Population	100.00%	100.00%		100.00%

As of September 30, 2019, PWDs represented 17.8 percent of the total civilian workforce. Of the 151 employees within the command identified with a reportable disability, 16 (1.9 percent) are identified as people with targeted disabilities (PWTD) as shown in Figure 2. Targeted disabled persons are a subset of those who have a reportable disability. There was a 6.7 percent net change of PWTD's in FY19 as compared to a 25 percent net change in FY18.

Figure 2. Total Workforce by Disability						
	FY 18	FY 18 %	FY 19	FY 19 %	Net Change #	Net Change %
Total Civilians	835	100	846	100	11	1.3
Disability Not Identified	51	6.1	75	8.9	24	32.0
Civilians With No Disabilities	624	74.7	620	73.3	-4	0.6
Civilians With Reportable Disabilities	160	19.1	151	17.8	-9	5.6
Civilians With Targeted/Severe Disabilities	15	1.8	16	1.9	1	7.5

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The EEOC disability employment goal is to employ 12 percent of the civilian workforce with individuals with disabilities, and 2 percent with individuals with targeted disabilities. The command has exceeded this goal with 17.8 percent PWD and the command's representation rate of 1.9 percent was slightly below the EEOC and DOD goal of 2 percent. The percent of PWTDs increased by 0.1 percent in FY19. To accomplish meeting the EEOC's goal for PWTD's, the command's plan of action to recruit, hire, and advance PWTDs is found in Part J of this report.

During FY19, seven Reasonable Accommodation (RA) requests were received. Of the seven requested, all were processed within 30 days as required by AR 690-12. The disposition of the requests shows all were granted.

The top five major occupations in FY19 were: Telecommunications Specialist (391), Miscellaneous Administrative and Program (301), General Engineer (801), Information Technology (2210) and Security Administration (080). Over half of the workforce at 523 (61.8 percent) were assigned to the top five major occupations in FY19. There continues to be race/ethnic/gender groups whose participation rate in these major occupations was less than expected, as compared to their percentage in the Relevant Civilian Labor Force (RCLF). The RCLF consists of all U.S. citizens assigned to positions within occupational series only.

During FY19, the most populous pay plan was NH (Business and Technical Management Professional Band) which comprised 720 (85.1 percent) of the workforce. The largest bands were the NH-03 and NH-04 bands with 653 (77.2 percent) employees. Senior Executive Service (SES)/Senior Level (SL)/Scientific and Professional (ST) employees comprised 7 (0.7 percent) of the total civilian workforce.

The benchmark comparison for representation at the grade/pay band level is the group percentage in the permanent workforce per EEO MD 715. As shown in Figure 3, workforce grades GG-13 through GG-15 had a total of 48 employees. Of the 48 employees, Hispanic females, White females, Black females, Native Hawaiian males, American Indians and Two or More Races females fell below their workforce participation rate. At the NH-03 pay band level, with exception of Blacks, Hispanic males, Native Hawaiian males, American Indian males, and Two or More Races females, all ethnic groups were below their workforce participation rate. At the NH-04 pay band level, with the exception of White males, all other ethnic/gender groups were below their workforce participation rate. In the SES/ST/SL positions, with the exception of White males, Asian males, and Two or More Races males no other ethnic/gender groups show participation rates.

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Figure 3. Workforce Grades GG 13 and Above by Race/Ethnicity/Gender							
EEO Group	GG-13	GG-14	GG-15	NH-03	NH-04	SES/SL/ST	SMDC PWF %
White males	51.4	80.0	33.3	58.5	69.0	66.6	58.8
White females	17.1	0	33.3	12.1	12.1	0	13.7
Black males	11.4	0	0	8.2	3.7	0	6.4
Black females	0.0	0	0	7.5	7.4	0	8.0
Hispanic males	11.4	0	0	5.4	3.7	0	4.8
Hispanic females	0.0	0	0	1.1	0.5	0	1.4
Asian males	2.9	0	0	0.9	1.1	16.7	1.2
Asian females	2.9	0	0	0.4	0	0	0.5
Native Hawaiian or PI males	0.0	0	0	0.9	0	0	0.5
Native Hawaiian or PI females	0.0	10.0	0	0	0.5	0	0.4
American Indian males	0.0	0	0	1.5	0.5	0	1.0
American Indian females	0.0	0	0	0	0	0	0.1
Two or More Races males	2.9	10.0	33.3	2.4	0.5	16.7	2.4
Two or More Races females	0	0	0	1.1	1.1	0	0.8
Totals	35	10	3	463	190	6	842

Management

Management positions are occupied by employees who plan, organize, lead/direct or control an organization. Employees assigned in management positions are represented in GG-13 and above grades or equivalent pay bands and executive level positions. Groups in management positions above their workforce participation rates in grade/pay band levels are White males at 100 percent and Two or More Races males at 50 percent. The participation rate of all other race/ethnic/gender groups in management grades/pay band levels was below their permanent workforce percent. (See Figure 4).

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Figure 4. Management Grades/Pay band levels GG13 and Above by Race/Ethnicity/Gender							
EEO Group	GG-13	GG-14	GG-15	NH-03	NH-04	SES/SL/ST	SMDC PWF %
White males	100	80.0	33.3	57.1	71.6	50.0	59.4
White females	0	0	33.3	8.6	12.5	0	13.4
Black males	0	0	0	5.7	4.5	0	6.6
Black females	0	0	0	14.3	5.7	0	7.5
Hispanic males	0	0	0	5.7	3.4	0	4.7
Hispanic females	0	0	0	0	0	0	1.3
Asian males	0	0	0	0	0	20.0	1.4
Asian females	0	0	0	0	0	0	0.7
Native Hawaiian or PI males	0	0	0	0	0	0	0.6
Native Hawaiian or PI females	0	10.0	0	0	0	0	0.4
American Indian males	0	0	0	2.8	0	0	0.8
American Indian females	0	0	0	0	0	0	0.1
Two or More Races males	0	10.0	33.3	2.8	1.1	20.0	2
Two or More Races females	0	0	0	2.8	1.1	0	1
Totals	1	10	2	35	88	5	831

Employee Recognition Awards Program

When analyzing awards data, discrepancies in the ratio of awards to the percent of race/ethnic/gender groups in the permanent workforce are considered triggers. An analysis of FY19 awards distributed revealed the following: Both minority and non-minority group employees received monetary awards equal to or above their permanent workforce percent. Honorary award data reveals some minority and non-minority ratio of awards were below their permanent workforce percent for honorary awards. This data will be monitored to determine if there may be a barrier to equal opportunity for any group.

Gains/Losses

In FY19, a total of 67 new employees were hired into the command. Gains refer to employees who may be internal or external to Army and new to USASMD. These gains helped to improve the participation rate of some race/ethnicity and gender groups within the command. In FY19 there was a decrease in gains for all groups except White males, Black females and Two or More Races females. To address the less than expected participation rate of White females, Hispanics, and Asians in the overall workforce, hiring efforts did not produce results toward these groups achieving parity with their NCLF rate. There were no gains for Hispanic females, yet they represented 1.3 percent of losses which did not improve their rate of participation in FY19. Asian males comprised 1.5 percent of total gains, with 1.3 percent of losses, therefore there was a slight decrease in their workforce percent towards achieving parity with their NCLF percent.

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Figure 5. Gains vs Losses by Race/Ethnicity/Gender					
EEO Group	FY18 Gains	FY18% Gains	FY18 Losses	FY18% Losses	NCLF%
White males	40	59.7	47	62.7	38.3
White females	10	14.9	9	12.0	34
Black males	5	7.5	4	5.3	5.4
Black females	5	7.5	3	4.0	6.4
Hispanic males	2	2.9	5	6.7	5.1
Hispanic females	1	1.5	1	1.3	4.8
Asian males	1	1.5	1	1.3	1.8
Asian females	0	0.0	1	1.3	1.8
Native Hawaiian or PI males	0	0.0	2	2.7	0.1
Native Hawaiian or PI females	0	0.0	0	0.0	0.1
American Indian males	0	0.0	0	0.0	0.3
American Indian females	0	0.0	0	0.0	0.3
Two or More Races males	3	4.5	1	1.3	0.7
Two or More Races females	0	0.0	1	1.3	0.8
Totals	67	100	75	100.0	100.0

Accomplishments (Barrier elimination for women, minorities and PWDs)

In FY18 triggers and potential barriers identified were the less than expected participation rate in the overall workforce of Hispanics, White females and Asians, and American Indian females also the participation rate of these groups in major occupations and FED 9 occupational categories. Due to hiring of Hispanics, there was some net gain in the rate of participation of these groups in the overall workforce and in certain occupations.

To address the barrier to the hiring and retention of PWTs as identified in the prior fiscal year, during FY19 there was improvement in the percent rate of PWTs and PWTs in the command workforce. Further, the net gain of PWTs increased in FY19. In FY20 we will re-survey the workforce.

Command Accomplishments/Noteworthy Activities in FY19

The EEO staff reviewed and analyzed EEO accomplishments of civilian and military supervisors under their appropriate appraisal system. The EEO Office provided feedback to rating officials as needed to assist in improving EEO performance and to support implementation of the command's affirmative employment efforts.

EEO Training. During FY19, the mandatory EEO, Anti-Harassment/No FEAR online training was provided to command civilian employees and military supervisors of

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civilians. As of September 30, 2019, completion data indicates the following: 85 percent completion for non-supervisors and 90 percent completion rate for all supervisors. SMDC EEO Office continues to educate the workforce about the Army Anti-Harassment Implementation Procedures, in Appendix D of AR 690-12, which outlines what steps management should take when harassment is reported.

Workforce Recruitment Program (WRP) Participation. The WRP is a DOD-sponsored recruitment and referral program that connects federal sector employers nationwide with highly motivated college students and recent graduates with disabilities. During FY19, the command participated in the WRP for the 6th year and recruited six students; however due to security clearance delays, only four were hired at the Huntsville location.

Staff Assistance Visits (SAVs). The EEO Office conducted four SAVs during FY19. During the SAVs, demographic information was presented and detailed discussions about recruitment, hiring practices and reasonable accommodations.

SMDC EEO office maintains high visibility and receive support from top leadership. Acting, EEO Director met with Commanding General quarterly and monthly with the Deputy, Chief of Staff providing regular EEO related updates.

Essential Elements A - F:

Form G Summary

<u>Form G Element</u>	<u>Number of Deficiencies FY19</u>	<u>Number of deficiencies FY18</u>	<u>Number increase/decrease</u>
A	0	0	0
B	1	5	-4
C	4	8	-4
D	1	6	-5
E	3	4	-1
F	0	0	0

The USASMD C directors, managers, supervisors, and EEO officials involved in the personnel management process share responsibility for the successful implementation of the command's EEO Program. The six essential elements designated by the EEOC for a Model EEO Program have been communicated through the management chain during briefings, implementation of senior leader EEO action plans, other administrative actions, and discussions.

Per EEOC guidance, the office completed a self-assessment checklist to ascertain the command's compliance with the essential elements of an agency Model EEO Program.

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The USASMDC met 95 percent of the 156 measures for compliance with these essential elements in FY19. This represents an increase of 10 percent from the FY18 rating.

The command showed strengths in all six elements measured, to include some new measures, which support maintaining a Model EEO Program. No deficiencies were identified in two elements - Demonstrated Commitment from Senior Leadership, and Responsiveness and Legal Compliance.

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Essential Element A: Demonstrated Commitment from Senior Leadership

Strengths:

1. All EEO policy statements are posted on the command's intranet (CMDNet) and public website. The following policies affirm the Commanding General's commitment to EEO and affirmative employment programs for everyone regardless of their status: 1) EEO Policy, dated June 20, 2018; 2) Anti-Harassment Policy, dated May 22, 2017; and 3) EEO/Affirmative Action, dated August 10, 2017. The policies demonstrate a firm commitment to EEO principles that govern all aspects of personnel/employment programs and management practices, which is ingrained in USASMDC's culture.
2. Senior leaders of major subordinate elements have their personal EEO policy statement that is provided to their employees and posted on organization bulletin boards and on their internal web page.

Deficiencies:

None

Essential Element B: Integration of EEO into the Agency's Strategic Mission

Strengths:

1. The USASMDC Commanding General met quarterly to discuss issues of importance in the EEO program.
2. EEO officials received the required 8 hours of refresher training in complaint processing EEO counselor's training and Reasonable Accommodation training for FY19.
3. The command's organizational chart defined the reporting structure of the EEO office as required by 29 CFR 1614.

Deficiencies (See Part H):

The Command's Strategic Plan does not reference EEO/Diversity and Inclusion principles. This is a new measure.

Essential Element C: Management and Program Accountability

Strengths:

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1. The command has established disability reasonable accommodation procedures that comply with EEOC'S guidance.
2. The command processed all reasonable accommodation requests within the thirty-day time frame set forth in its policy and IAW AR 690-12, Appendix C.
3. The EEO office participates in command Staff Assistance Visits (SAVs) to ensure unit compliance with EEO directives/regulations and identification of EEO program deficiencies.

Deficiencies (See Part H):

1. Training materials on the command's anti-harassment policy do not include examples of disability-based harassment.
2. The command does not post its procedures for processing request for Personal Assistance Services (PAS). Waiting on HQDA to issue there PAS procedures.

Essential Element D: Proactive Prevention of Unlawful Discrimination

Strengths:

1. Timetables have been established for the command to review its Merit Promotion Program Policy and Procedures, Employee Recognition Awards Program and its Employee Development/Training Programs.
2. The command has taken specific steps to help increase the number of persons with disabilities or targeted disabilities employed by recruiting through the Workforce Recruitment Program (WRP).

Deficiencies (See Part H):

The command's affirmative action plan for persons with disabilities/targeted disabilities is not posted on its public website.

Essential Element E: Efficiency

Strengths:

1. The command has an effective system in place to track recruitment efforts to assist in analysis of potential barriers IAW MD 715 standards.
2. EEO officials timely issue complaint acknowledgment letters and

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acceptance/ dismissal letters according to AR 690-600.

3. The command has a system in place for the processing and tracking requests for reasonable accommodations.

Deficiencies (See Part H):

1. There is no system in place to accurately collect, monitor, and analyze external/internal applicant flow data concerning the applicant's race, national origin, sex, and disability status. This deficiency is a DA-wide issue. DA measurement mechanism for accurate applicant flow data capture is being developed, Army will address this deficiency in their plan. EEO will monitor for progress.

2. The command does not compare its performance in the EEO process to other federal agencies of similar size or share best practices.

Essential Element F: Responsiveness and Legal Compliance

Strengths:

1. The command has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.

2. The command complies with the law, including EEOC regulations, management directives, orders, and other written instructions.

3. The command reports to EEOC, through HQDA, its program efforts and accomplishments.

Deficiencies: None.

Complaints processing summary:

<u>Total inventory (462)</u>	<u>Median informal days *</u>	<u>Median Formal days</u>	<u>Number of formals beyond 180 days</u>	<u>Number formals accepted or dismissed</u>	<u>Number of formals remanded</u>	<u>Number of ADR offered</u>	<u>Number of ADR conducted</u>
11	44	173	0	11	0	1	1

The number of formal complaints filed against USASMDC increased to eleven in FY19, compared to nine in FY18. The issues included terminations, terms and conditions of employment, non-selection, evaluations, assignment of duties and harassment (non-sexual). The bases for these complaints were

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disability, reprisal, sex, race, and age.

During FY19, eleven informal complaints were filed against USASMDC, as compared to five filed in FY18. The issues included terminations, terms and conditions of employment, non-selection, evaluations, assignment of duties, harassment (non-sexual) and hostile work environment. The bases of these complaints were race, color, gender, reprisal, and disability (physical). EEO will continue to track pre-complaint and formal filings for trends and potential triggers.

Strategy for FY20

The command's strategy for FY20 is to ensure that EEO is integrated into the command's strategic mission through continuing efforts to raise awareness and educate managers/supervisors on EEO laws/regulations/policies and directives. Six initiatives were identified for continued progress in maintaining a Model EEO Program:

- Assist command organizations with developing and implementing their senior leader EEO action plan. This plan is aligned with essential elements of a Model EEO Program and addresses barrier elimination as identified in the EEO Program Status Report.
- Increase management participation in the WRP for students with disabilities and work with management to develop strategies to convert high performing students to permanent positions.
- The EEO and G1 will develop a process for command outreach visits to universities and special emphasis conferences. Focus will be on recruiting women and minority groups to improve their workforce participation rates and the command's overall diversity profile.
- Managers/supervisors will be trained on the importance of using appointing authorities to hire PWTs.
- Training management on the importance of the Anti-harassment program and procedures according to AR690-12, appendix D.

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Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	
Complaint Data (Trends)	Yes	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	
Exit Interview Data	Yes	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	n/a	

Status of Barrier Analysis Process

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

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EEO Plan to Eliminate Identified Barrier

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

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Representation Data; Participation rate in FED 9 Categories; the Participation Rate in Command Major Occupations	A1 A6-1 A3-1-1	The participation rate of Hispanics, Asians and White females in the overall workforce, in certain FED 9 job categories and in some major occupations are below their participation rates in the NCLF and the RCLF.

EEO Group(s) Affected by Trigger (Check)

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

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)		

Status of Barrier Analysis Process

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

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Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
<p>Due to the nature of the command's mission, most vacancies are announced at the mid to senior grade level or equivalent, therefore, decreasing the opportunity to recruit at a lower level where you may get a more diverse pool of applicants to fill permanent positions for departing employees.</p>

Objective(s) and Dates for EEO Plan

Objectives	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)
<p>1. Increase the representation of, Hispanics, Asians, Native American females, and White females in the overall workforce, in the FED 9 job categories, and major occupations where their participation rate is less than expected versus the NCLF and RCLF.</p> <p>2. Identify recruitment strategies/initiatives to assist in accomplishing this objective</p>	11/17/2017	12/30/2022	Yes	10/1/2018	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
	Mary Peoples	Yes

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Title	Name	Performance Standards Address the Plan? (Yes or No)
Deputy Chief of Staff, G-1	LTC Warren	Yes
MSE Senior Leaders	All	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
12/30/2020	1. Develop a command recruitment plan to address employment initiatives and recruitment strategies to improve the participation rate of Hispanics, Asians, Native American females, and White females in the workforce and include such initiatives in the command's Human Capital Plan and Operation Plan. Utilize direct hiring authority to perform targeted recruitment during special emphasis conferences, meetings, job fairs.		
12/30/2021	2. Include action items in the command's Human Capital Plan and Operation Plan to ensure emphasis is placed on a command intern program for targeted recruitment of Hispanics, Asians and White females whose participation rate is below that which is expected based on the NCLF and RCLF as appropriate.		
12/30/2021	3. Maintain trend data on overall workforce representation of Hispanics, Asians and White females and their participation rate by FED 9 job categories, and major occupations and analyze to determine if there are improvements from year to year.		

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Report of Accomplishments

Fiscal Year	Accomplishments
FY19	<ol style="list-style-type: none">1. There was a slight increase in White females in the overall workforce for FY19. Analysis of gains during FY19 shows that while White females represented 10 (14.9 percent) of hires, and remain below their expected percentage in the overall workforce. The participation rate for White females in the FED 9 categories and in major occupations (301, 343, 391, and 2210) did not show any improvement during FY19 and their participation rate remains lower than that is expected.2. Hispanics were not represented in the gains for FY19. Trend data shows that although the Hispanic participation rate increased over the last five years, Hispanics still remain below their workforce participation rate compared to the NCLF. The participation rate for Hispanics in all five FED 9 job categories and in all five major occupations continues below their RCLF percent.3. A command recruitment plan, with emphasis on an intern recruitment initiative, was developed and approved by the Deputy to the Commanding General for implementation in FY19.

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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 persons with targeted disabilities (PWTD), Equal Employment Opportunity Commission (EEOC) regulations (29 C.F.R. § 1614.203(e)) and Management Directive (MD) 715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention 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 C.F.R. § 1614.203(d) (7)) require agencies to establish specific numerical goals for increasing the participation of persons with reportable and targeted disabilities in the federal government.

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

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

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

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

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

The command provided all managers and supervisors a copy of the annual EEO Program Status Report that reflects a data chart that shows the benchmark/goal of PWDs and PWTDs and their accompanying percent in the workforce. The report also provides accomplishments towards reaching the goals for PWTDs since the command is above the goal percent for PWDs in the workforce.

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Section II: Model Disability Program

Pursuant to 29 C.F.R. §1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

A. Plan to Provide Sufficient and Competent Staffing for the Disability Program.

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

	Yes	X	No	

2. Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	X			Chanley Pickard, Disability Program Manager (DPM) EEO Office
Answering questions from the public about hiring authorities that take disability into account	X			Chanley Pickard, DPM EEO Office
Processing reasonable accommodation requests from applicants and employees	X			Chanley Pickard, DPM EEO Office
Section 508 Compliance	X			Chanley Pickard, DPM EEO Office
Architectural Barriers Act (ABA) Compliance	X			Chanley Pickard, DPM EEO Office
Special Emphasis Program for PWD and PWTD	X			Chanley Pickard, DPM EEO Office

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

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	Yes	X	No	
The command acting, disability program manager and affirmative employment manager attended a webinar course sponsored for a local command on Reasonable Accommodation updates by the EEOC. During the upcoming year, EEO staff will attend the EEOC EXCEL Training Conference and disability training at the Defense Equal Opportunity Management Institute.				

B. Plan to Ensure Sufficient Funding for the Disability Program.

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If "no", describe the agency's plan to ensure all aspects of the disability program have sufficient *funding* and other *resources*.

	Yes	X	No	

Section III: Plan to Recruit and Hire Persons with disabilities

Pursuant to 29 C.F.R. § 1614.203(d) (1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of persons with disabilities. The questions below are designed to identify outcomes of the agency's recruitment program plan for PWD and PWTD.

A. Plan to Identify Job Applicants with Disabilities.

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

The command uses the Workforce Recruitment Program (WRP), a DoD and Department of Labor recruitment program to hire summer interns who are disabled. The DPM has access to a WRP database that houses resumes for review of persons with disabilities and targeted disabilities eligible for hire. The following resources are used in identifying and hiring PWDs/PWTDs: Schedule A appointing authority and Veteran Appointment Authorities for recruiting disabled veterans.

2. Pursuant to 29 C.F.R. § 1614.203(a) (3), describe the 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.

Schedule A hiring authorities are used to recruit summer intern positions under the WRP and PWTDs or PWDs recruited at job fairs; or from resumes obtained through the Wounded Warrior Program for CHRA referral process. Other authorities such as a VEOA and Veteran authorities are used to recruit disabled veterans with a 30 percent compensable disability for permanent positions. The command hired two students with disabilities in FY19 under Schedule A.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority and (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed. The command DPM forwards resumes of summer interns to hiring managers for review/interest in recruiting. Once interest is determined in recruiting, resume is sent to the Human Resources specialist who forwards information to the servicing Civilian Personnel Advisory Center (CPAC).

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The CPAC contacts the applicant and requests more information to certify nature of disability endorsed by a vocational rehabilitation or medical provider and then completes appointment documents to make a job offer.

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

	Yes	X	No	
Training on the use of hiring authorities by hiring managers was completed in FY19 during Supervisory mandatory training.				

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.

The command maintains relationships with DoD and Department of Labor that assist PWD and PWTDs in securing employment through the WRP each year. These agencies sponsor this program each year.

C. Progression Towards Goals (Recruitment and Hiring)

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

a. New Hires for Permanent Workforce (PWD)	Yes		No	X
b. New Hires for Permanent Workforce (PWTD)	Yes	X	No	
During FY19, 67 new employees were hired in various occupations/grades. The percent of PWDs hired was above the benchmark of 12% with hiring 9 (13.4%) PWDs. During this FY we did not hire any PWTDs. SMDC has a total of 1.9% of PWTDs; which slightly below the 2% benchmark.				

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	X
b. New Hires for MCO (PWTD)	Yes		No	X
The command does not have access to an accurate qualified applicant pool data for MCOs to determine triggers.				

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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	
b. Qualified Applicants for MCO (PWTD)	Yes		No	

The command does not have access to an accurate relevant applicant pool to determine if triggers exist for PWD and or PWTD among qualified internal applicants of MCOs. This is a DA wide issue.

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 (MCO)? If "yes", please describe the triggers below.

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

The qualified accurate applicant pool data is not available for PWDs and PWTDs to determine the presence of triggers among employees promoted to MCOs. This is a DA-wide issue.

Section IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R §1614.203(d) (1) (iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address 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.

The command ensures that all employees are aware of competitive promotion opportunities and also initiatives for career development that can improve employee's competitive edge.

B. Career Development Opportunities

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

The following were available career development opportunities provided to command employees in FY19: Civilian Education System Courses, Army Acquisition Workforce Training courses, Acquisition Leadership Challenge Program training, competitive career development assignments and Senior Service College attendance.

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2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate. [Collection begins with the FY19 MD 715 report, which is due on January 31, 2019.]

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs (DA and SMART Program)	Unknown for DA Intern. Smart - 2,068.	6	Unknown for both programs, DA and DoD referrals.	0	Unknown for both programs, DA and DoD referrals.	0
Fellowship Programs	4	4	Unknown	0	Unknown	0
Mentoring Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0
Training Programs	14	14	Unknown	2	Unknown	0
Detail Programs (Developmental Assignments)	Unknown	1	Unknown	0	Unknown	0
Other Career Development Programs	0	0	0	0	0	0

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

a. Applicants (PWD)	Yes		No	X
b. Selections (PWD)	Yes		No	X
The relevant applicant pool is not tracked or available for those who are applicants for career development programs indicated in item above.				

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

a. Applicants (PWTD)	Yes		No	X
b. Selections (PWTD)	Yes		No	X
Accurate relevant applicant pool data not known for programs identified.				

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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, and Incentives (PWD)	Yes		No	X
b. Awards, Bonuses, and Incentives (PWTD)	Yes		No	X

Data to track time off-awards, bonuses, or other incentives was not available during FY19 to determine if any triggers exist.

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

Command employees are assigned under pay banding system that does not utilize quality step increases for performance-based pay increases. Data not available for tracking performance-based pay increases under the existing pay performance system.

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		No	X
b. Other Types of Recognition (PWTD)	Yes		No	X

The command provides recognition in the form of various forms of Honorary Awards, i.e., Achievement Medal for Civilian Service, Superior Civilian Service Award, Commander's Civilian Service Award, Meritorious Civilian Service Award, and Certificate of Achievement). Relevant data reviewed during FY19 of honorary awards reveals that 110 honorary awards were provided to command employees. Of this number 21 (19.1%) were PWDs and 2 (1.8%) were PWTDs. The percent for PWDs is above their inclusion rate of 17.8%. The percent for PWTDs is below their inclusion rate of 1.9%.

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	
	ii. Internal Selections (PWD)	Yes		No	

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b. Grade GS-15	i. Qualified Internal Applicants (PWD)	Yes		No	
	ii. Internal Selections (PWD)	Yes		No	
c. Grade GS-14	i. Qualified Internal Applicants (PWD)	Yes		No	
	ii. Internal Selections (PWD)	Yes		No	
d. Grade GS-13	i. Qualified Internal Applicants (PWD)	Yes		No	
	ii. Internal Selections (PWD)	Yes		No	
Unable to describe, there is no accurate relevant applicant pool data on qualified internal applicants to the senior grade levels.					

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	
	ii. Internal Selections (PWTD)	Yes		No	
b. Grade GS-15	i. Qualified Internal Applicants (PWTD)	Yes		No	
	ii. Internal Selections (PWTD)	Yes		No	
c. Grade GS-14	i. Qualified Internal Applicants (PWTD)	Yes		No	
	ii. Internal Selections (PWTD)	Yes		No	
d. Grade GS-13	i. Qualified Internal Applicants (PWTD)	Yes		No	
	ii. Internal Selections (PWTD)	Yes		No	
Unable to provide response due to absence of accurate qualified internal applicants for senior grade level promotions.					

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	
b. New Hires to GS-15 (PWD)	Yes		No	
c. New Hires to GS-14 (PWD)	Yes		No	
d. New Hires to GS-13 (PWD)	Yes		No	
Unable to respond due to unavailability of accurate qualified applicant pool data for new hires to senior grade levels, therefore cannot determine if trigger exist for PWD.				

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	
b. New Hires to GS-15 (PWTD)	Yes		No	
c. New Hires to GS-14 (PWTD)	Yes		No	
d. New Hires to GS-13 (PWTD)	Yes		No	
Unable to respond due to unavailability of accurate qualified applicant pool data for new hires to senior grade levels to determine if trigger exist for PWTDs.				

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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	
	ii. Internal Selections (PWD)	Yes		No	
b. Managers	i. Qualified Internal Applicants (PWD)	Yes		No	
	ii. Internal Selections (PWD)	Yes		No	
c. Supervisors	i. Qualified Internal Applicants (PWD)	Yes		No	
	ii. Internal Selections (PWD)	Yes		No	
No availability of accurate qualified applicant pool data for internal applicants for promotions so supervisory positions for PWDs.					

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	
	ii. Internal Selections (PWTD)	Yes		No	
b. Managers	i. Qualified Internal Applicants (PWTD)	Yes		No	
	ii. Internal Selections (PWTD)	Yes		No	
c. Supervisors	i. Qualified Internal Applicants (PWTD)	Yes		No	
	ii. Internal Selections (PWTD)	Yes		No	
Unable to respond due to unavailability of accurate qualified applicant pool data for internal applicants for promotions to supervisory positions for PWTDs.					

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		No	
b. New Hires for Managers (PWD)	Yes		No	
c. New Hires for Supervisors (PWD)	Yes		No	
Unable to respond due to unavailability of accurate qualified applicant pool data for new hires to supervisory positions for PWDs				

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	
b. New Hires for Managers (PWTD)	Yes		No	X
c. New Hires for Supervisors (PWTD)	Yes		No	X
Unable to respond due to unavailability of accurate qualified applicant pool data for new hires to supervisory positions for PWTDs.				

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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 this section, 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 convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If "no", please explain why the agency did not convert all eligible Schedule A employees.

	Yes	X	No	

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		No	X
b. Involuntary Separations (PWD)	Yes		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		No	X
b. Involuntary Separations (PWTD)	Yes		No	X

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

No trigger exists regarding separation rates of PWD and PTWDs.
--

B. Accessibility of Technology and Facilities

Pursuant to 29 C.F.R. § 1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

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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, including a description of how to file a complaint.

<https://www.smdc.army.mil/2008/Accessibility.asp>

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, including a description of how to file a complaint.

<https://www.smdc.army.mil/2008/Accessibility.asp>

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.

During FY19, the command improved egress for accessibility of PWDs/PWTDs from reserved parking spaces to the building entrance. New ramps were installed to optimize accessibility for those using handicap parking.

C. Reasonable Accommodation Program

Pursuant to 29 C.F.R. § 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 interpreting services.)

Ninety-five percent of all Reasonable Accommodation (RA) Request are processed within 30 days.

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

Command utilizes the following practices to implement its RA program. (1) Timely process RA request. (2) Provide approved accommodation in timely manner and as needed provide a temporary accommodation pending receipt of final accommodation. (3) Conduct briefings/refresher training for managers/supervisors annually.

D. Personal Assistance Services Allowing Employees to Participate in the Workplace

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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 (PAS) 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 for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

Currently the command has not developed a PAS policy pending guidance/direction from HQDA; however, the DPM and supervisors have written procedures giving some guidance on handling requests. In FY19, no PAS requests were received for action.

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	No	x
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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	No	X
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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.

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	No	X
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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	No	X
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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.

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.

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

	Yes	X	No	
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2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?

	Yes	X	No	
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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	Persons with Targeted Disabilities			
Barrier(s)	Attitudinal barriers due to lack of awareness; underutilization of Schedule A Hiring Authority to recruit PWTD and a low rate of authorizations to recruit for PWTD.			
Objective(s)	Increase the rate of PWTD to 2 percent to support the DoD and EEOC employment goals and objectives through utilization of targeted recruitment sources/initiatives and direct hiring authority.			
Responsible Official(s)		Performance Standards Address the Plan?		
Senior Leaders, EEO/G-1				
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)

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12/30/2020	1. Collaborate with G-1 on various avenues to recruit, hire, and retain targeted disabled persons in order to increase employment of PWTD using special hiring authorities as hiring opportunities occur, i.e. Wounded Warrior Program, Expedited Referrals from DA Civilian Human Resources Agency and VRA.			
12/30/2020	2. Continue utilizing the WRP to attract college students or recent graduates for internships, which may lead to permanent employment.			
12/30/2020	3. Utilize direct hiring authority to recruit PWDs/PWTDs under approved command intern recruitment program.			
Fiscal Year	Accomplishments			
FY19	USASMDC participation rate of PWTD increased by 0.1 percent in FY19. This represented a 7.5 percent net change in the representation rate as compared to the net change in FY18.			
FY19	Two summer interns with disabilities were hired under the WRP program at the command's Huntsville location. During FY19, six interns with disabilities were recruited successfully for employment under the WRP; however, only four were successfully on-boarded due to delays in granting a mandatory interim secret clearance. Of the four students recruited, three were extended for one year.			

4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

Delayed completion and granting of an interim security clearance from OPM prevented all six recruited PWDs from being hired in FY19.

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

Command utilized the WRP to recruit and hire two interns with a disability improving the command's applicant pool from which to offer permanent employment with a Schedule A conversion as vacancies materialized.

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.

During FY20, the command intends to improve the plan by implementing its intern recruitment program with 12 approved authorizations to actively recruit interns that include PWDs and PWTDs.