

# Proactive Prevention Through Organizational Assessment



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

*Office Of Civil Rights*

ACHIEVING SAFETY  
THROUGH DIVERSITY

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# Purpose and Outcome

## **Purpose:**

To share information about the Federal Aviation Administration (FAA) Office of Civil Rights' MD- 715 Toolkit that may be used to achieve a model workplace.

## **Outcome:**

Participants will learn how various tools can enhance an agency's trend and barrier identification process.

# Equal Employment Opportunity Commission Management Directive 715

## Model Agency Title VII and Rehabilitation Act Programs

(Model EEO Program).....This Directive requires agencies to take appropriate steps to ensure that all employment decisions are free from discrimination. It also sets forth the standards by which EEOC will review the sufficiency of agency Title VII and Rehabilitation Act programs, which include periodic agency self-assessments and the removal of barriers to free and open workplace competition.

# Six Essential Elements

1. Demonstrated commitment from agency leadership
2. Integration of EEO into the agency's strategic mission
3. Management and program accountability
4. Proactive prevention of unlawful discrimination
5. Efficiency
6. Responsiveness and legal compliance

# Model EEO Program: How do you know if you are meeting the requirements?

Organization/facility assessments. You must have:

- **Purpose:** Measure the climate by using the six essentials elements as standards
- **Communicate:** Clarify that this is not a substitute for the complaint process
- **End Result:** Real-time snapshot, identification of best practices
- **Timeliness:** Develop an action plan

# Agency Self-Assessment

- Agencies have an ongoing obligation to eliminate barriers
- Agencies must conduct a self-assessment on at least an annual basis to monitor progress and identify areas where barriers may operate to exclude certain groups
- A "snapshot" can serve as a diagnostic tool to help agencies determine possible areas where barriers may exist and may require closer attention
- View statistics in the context of the totality of the circumstances. Conclusions concerning the existence of workplace barriers cannot be drawn from gross numerical assessments

# The FAA Office of Civil Rights Toolkit

- The identification of workplace barriers requires a thorough examination of all of the circumstances.
- The FAA Office of Civil Rights Toolkit consists of:
  - Leadership Assessment - Desk Audit
  - Defense Equal Opportunity Management Institute Federal Organizational Climate Survey (DEOMI FEOCS)
  - Focus Group Assessment
  - On-site Assessment

# Leadership Assessment - Data Audit

## What it is:

- Data analysis tool/data audit
- Analyze employment practices – where barriers typically arise

## What do you do with it:

Look for triggers that could lead to potential barriers by reviewing records, documentation and processes

- Recruitment, hiring and placement, promotions & other selections
- Awards distribution, discipline, separations
- Reasonable accommodation requests
- EEO complaints or hotlines, grievances, AB reports that allege discrimination or harassment

# Leadership Assessment - Data Audit (cont'd)

## When would you use it:

- Policy & practice issues that arise
- Not necessarily through complaint process (one avenue)
- Any size, have to have a sufficient amount of data to review (not identifying individual data)

# DEOMI FEOCS

## What it is:

- Administered by DEOMI – agency gets results – report, graphs & charts
- Provides a surface picture of the EEO climate (6 elements)
- Is an online survey (voluntary, anonymous process)
- Captures employee perceptions about practices, policies, procedures
- Asks employees for feedback and input (6 elements)

## DEOMI FEOCS (cont'd)

### When would we use this tool:

- When trends have not been identified
- Type of work environment has not been identified
- Larger group (certain amount of surveys to get a report)

### Process:

- Lead assessor + team (size depends on factors)
- Opening sessions (management team, employees, bargaining unit)
- Encourage participation, educate
- Distribute pin codes

# Focus Group

## What it is:

- Facilitated, small group sessions to get input and feedback on specific allegations and issues that have arisen in the work environment
- Climate check, but focused

## When would you use this tool:

- Awareness of very specific problem centered issues through EEO complaints, Accountability Board matters, anonymous letters to Administrator, Congressionals, manager requests, hotlines, etc.
- Any size group (broken into small groups)
- Advance notice needed for planning

# Focus Group (cont'd)

## Process

- Lead Assessor has to formulate process
- Questions for focus group developed (specific to the situation)

# On-site Assessment

## What it is:

- Full scale climate check – 6 elements (affirmative program items, regulatory obligations)

## When would you use this tool:

- Interested in improving the workplace
- Might be underlying issues but have not been identified
- Has to be a large enough group to provide effective analysis
- Ideally for groups greater than 30 in number to protect anonymity

# On-site Assessment (cont'd)

## Process:

- Lead Assessor + Team
- Opening sessions to educate gain participation
- Online launched
- In person interviews with team members
- On-site Environmental Scan
- Information Sharing/Model EEO

# Plan & Follow-up

- Assessment recommendations
- MD-715 Six Essential Elements
- Organization/facility ownership
- Civil Rights guidance and support
- Six-month follow-up

# References

U. S. Equal Employment Opportunity Commission, Instructions to Federal Agencies for EEO MD-715

<http://www.eeoc.gov/federal/directives/715instruct/section1.html>

Defense Equal Opportunity Management Institute, Federal Organizational Climate Survey

<http://www.deomi.org/feocs/public/index.cfm>