

Barrier Analysis From the Ground Up

Part I: Triggers & Tables

What is MD-715?

- Management Directive 715 provides policy guidance and standards for establishing and maintaining effective affirmative employment programs of equal opportunity under section 717 of Title VII and Section 501 of the Rehabilitation Act.

Barrier Analysis Process

- Barrier analysis is an investigation of anomalies found in workplace policies, procedures, practices, and conditions with the goal of identifying the root causes of those anomalies, and if necessary, eliminating them.
- The goal is remove the obstacles to employment opportunities, and not to achieve parity in the workforce.

What is a Barrier?

- A **barrier** is a policy, practice, procedure, or condition that limits employment opportunities for members of a particular race, ethnic background, gender or because of a disability.

Types of Barriers

Will you know one when you see it?

- **Institutional**
Example: Agency primarily recruits from local 4 year colleges/universities or from the military.
- **Attitudinal**
Example: Women will not return to work after having a child.
- **Physical**
Example: Building is not handicap accessible.

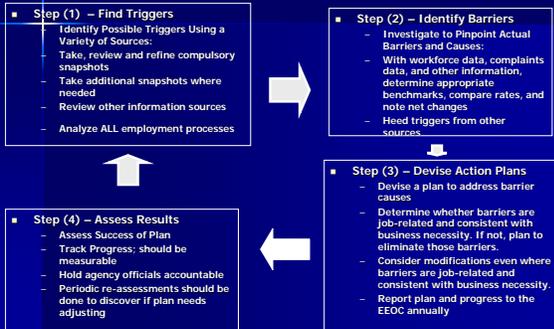
Barrier Analysis Should Be ...

- Focused
- Methodical
- Involve the participation of all relevant agency officials

Steps in Barrier Analysis

- Step 1 - Find triggers by comparing workforce snapshots to benchmarks and noting "irregularities" in other sources of information
- Step 2 - Investigate the causes of the triggers to identify potential barriers
- Step 3 - Develop and implement a plan to remove identified barriers
- Step 4 - Assess success of the plan

Barrier Analysis Process



Step 1: What is a Trigger?

- A **trigger** is a "red flag."
- Triggers are conditions, disparities, or anomalies warranting further inquiry.
- Agencies must investigate triggers to determine whether actual barriers exist.
- Remember, triggers can lead to barriers. Every trigger may not lead to a barrier. Every barrier may not have a trigger.

Take Stock of Initial Symptoms:

- Low participation rates
- High separation rates
- Frequent complaints
- Low morale

Let's Focus on Workforce Data Table Analysis

- Compare target population to baseline population.
- Find the baseline population that is most like the target population.
- If target rate is below baseline rate, then we have a trigger
- Separations – if target rate above baseline rate, then we have a trigger

Comparative Populations in Workforce Data Tables

- A Tables
 - Table A1 - Workforce Snapshots: CLF
 - Tables A3/4 – Senior Positions and Grades: Permanent Workforce (PWF)
 - Table A8 – Hirings: CLF
 - Table A14 - Separations: TWF
 - Table A6 – Major Occupations: RCLF
 - Tables A7/9/11/12 – Selections: Qualified Applicants

Looking for Triggers in the A Tables

- Workforce data from different tables can be grouped in ways that reveal patterns:
 - Overall Workforce
 - Total Participation – Table 1
 - Hiring – Table 8
 - Separations – Table 14
 - Senior and Mid-level Management
 - Permanent Workforce Participation – Table 3
 - Career Development – Table 12
 - Senior Grades
 - Permanent Workforce Participation – Table 4
 - Competitive Promotions – Table 11
 - Major Occupations
 - Participation rate compared to RCLF – Table 6
 - Hiring – Table 7
 - Competitive promotions – Table 9
 - Geographical Locations – Table 2

Workforce Snapshot

- Target Population: Participation rate of Hispanic Males in agency's Work Force in FY 2006 = 3.25%
- Comparative Population: Availability of Hispanic Males in CLF = 6.17%
- Participation Rate of HM in TWF (3.25%) < Availability of HM in CLF (6.17%) → Trigger

Peeling the Onion: Looking for More Clues

- Table A8
 - 1644 new hires during FY 2006, 30/1644 HM
 - $30/1644 = 1.82\% < \text{CLF HM from Table A1 (6.17\%)} \rightarrow \text{Trigger and evidence of barrier with respect to low participation rate of HM in TWF}$
- Table A14
 - Separation rate of HM – 2.80%
 - Availability of HM in TWF – 3.25%
 - → Not a Trigger

Summarizing Workforce Data

	HM
Civilian Labor Force (Table A1)	6.17%
Total Work Force (Table A1)	3.25%
Total New Hires (Table A8)	1.82%
Total Separations (Table A14)	2.80%

Senior Level Officials & Managers Workforce Data Tables A1, A3-1

- Occupational Categories:
 - Target Population – Participation Rate of HM in Senior Level Officials & Managers = 1.93%, from Table A3-1
 - Baseline Population – Participation Rate of HM in Permanent Work Force (PWF) – Table A1 = 3.32%
 - 1.93% < 3.32% → Trigger

Follow Your Lead

- Table A12 – No Hispanic Males applied for the SES Career Development program, notwithstanding that 2.90% of the relevant applicant pool for the SES Career Development program was HM
- Another clue – trigger as well as evidence of a possible barrier

Group the Data Together

	HM
Permanent Work Force (Table A1)	3.32%
Senior Level Officials & Managers (Table A3-1)	1.93%
Relevant Pool for SES Program (Table A12)	2.90%
Applied for SES Program (Table A12)	0.00%

Senior Grades (GS13-SES) Tables A1, A4-1

- **Target: Participation Rate of HM in GS-13 through SES (Table A4-1)**
 - To calculate:
 - Add GS-13 through SES for HM
 - Divide by permanent GS-13 through SES workforce
- **Baseline: Participation Rate of HM in Permanent Work Force (Table A1)**

Senior Grades – Table A4-1

		HM
GS-13	#	84/2808
	%	2.99%
GS-14	#	54/1516
	%	3.56%
GS-15	#	13/823
	%	1.58%
SES	#	6/243
	%	2.47%
Total Senior Grades	#	157/5390
	%	2.91%
PWF (Table A1)	#	495/15269
	%	3.25%

Promotions to Senior Grades – HM Table A11

Promotion	Qualified	Selected
To GS-13	5.88%	2.56%
To GS-14	4.22%	5.00%
To GS-15	2.20%	14.29%

Composite Table – HM in the Senior Grades

HM	Qualified	Selected	Participation
PWF			3.25%
GS-13	5.88%	2.56%	2.99%
GS-14	4.22%	5.00%	3.56%
GS-15	2.20%	14.29%	1.58%

Persons with Targeted Disabilities

- Comparison is always as follows:
 - Target: Participation rate of persons with targeted disabilities (PWTD)
 - Baseline: Participation rate of persons without targeted disabilities (PWOTD)
 - PWOTD includes:
 - Persons without disabilities (PWOD)
 - Persons with unidentified disabilities (PWUD)
 - Persons with reported disabilities less targeted disabilities PW(RD-TD) because TD are included in RD
 - PWOTD = PWF – PWTD = Everybody Else

Persons with Targeted Disabilities

- If PWTB Participation Rate < PWOTD Participation Rate → Trigger
- Participation rate of PWTB in Part J = PWTB Participation rate in Table B1, but it may not be if Part J and Table B1 were prepared at different times
- Net change of PWTB in Part J = Net Change of PWTB in Table B1 = difference between New Hires of PWTB in Table B8 and Separations of PWTB in Table B14, but may not be for same reason

Comparative Populations: PWTB compared to PWOTD

- B Tables
 - Snapshots - The comparative population to persons with PWTB is always PWOTD (Tables 1,3,5,6,8,14)
 - Mobility – Tables 7,9,11,12 – Applicant Pools
 - Table 7 - [PWTB Hired / PWTB Applied] compared to [PWOTD Hired / PWOTD Applied]
 - Table 9 - [PWTB Hired / PWTB Qualified] compared to [PWOTD Hired / PWOTD Qualified]
 - Table 11 - [PWTB Hired / PWTB Qualified] compared to [PWOTD Hired / PWOTD Qualified]
 - Table 12 - [PWTB Participants / PWTB Applied] compared to [PWOTD Participants / PWOTD Applied]

Composite of B Tables

Participation of Persons with Targeted Disabilities		Total	Total by Disability Status			
			No Disability	Not Identified	Reported Disability	Targeted Disability
Perm Work Force Table B1	#	15,396	13,657	596	1,143	185
	%	100.00%	88.70%	3.88%	7.42%	1.20%
Federal High	%					2.37%
Senior O/M Table B3-1	#	1,356	1,191	76	89	8
	%	100%	87.83%	5.60%	6.56%	0.59%
Senior Grades Table B4-1	#	5,390	4,775	277	338	52
	%	100%	88.59%	5.14%	6.27%	0.96%

Finding Triggers in B Tables

- **Snapshot of Total Workforce (Table B1)**
 - Target: Participation Rate of PWTDS in total workforce: $(185/15,396) = 1.20\%$
 - Baseline: Federal High = 2.37% in FY 2006
- **Identifying Comparative Populations (B1):**
 - Denominator for Target: PWTD = 185
 - Denominator for Baseline: PWOTD = PWF (15,396) – PWTD (185) = 15,211

Finding Triggers in B Tables

- **Senior-Level Officials and Managers**
- **Tables B1 and B3-1**
 - Target: Participation Rate of PWTDS = $\#PWTDS \text{ in OC} / \#PWTDS \text{ in PWF} = 8/185 = 4.32\%$
 - Baseline: Participation Rate of PWOTDs = $\#PWOTDs \text{ in OC} / \#PWOTDs \text{ in PWF} = (1356 - 8) / 15,211 = 1,348/15,211 = 8.86\%$

Finding Triggers in B Tables

- **Senior Grade Levels (Tables B1 & B4-1)**
 - Target: Participation Rate of PWTD at senior grades (PWTD SG / PWTD in PWF) = $52/185 = 28.11\%$
 - Baseline: Participation Rate of PWOTD at senior grades (PWOTD SG / PWOTD in PWF) = $(5,390-52)/15,211 = 5,338/15,211 = 35.09\%$

Caveat with Small Numbers

- Small numbers can distort the meaning of the statistics. For example, HM Participation rate of 1.58% at GS-15 remained low notwithstanding relatively high selection rate

GS-15 PR (Table A4-1)	Qualified (Table A11)	Selected (Table A11)
13/823	2/91	1/7
1.58%	2.20%	14.29%

Step 2 – Finding the Barriers

- A **barrier** is the root cause of the trigger; it is the working hypothesis from which action plans will be devised.
- Goal is always to pinpoint that root cause(s).
- Keep drilling down until there is an answer to the question “why.”

More Sources of Information

- EEO complaints data (Form 462 data)
- Grievances, reasonable accommodation requests, and harassment complaints
- EEO and Human Resources offices
- Other agency offices (programmatic & career development)
- Union and advocacy groups
- Surveys, focus groups, & exit interviews
- Case decisions and studies by outside organizations (GAO, EEOC, OPM)

Types of Policies, Procedures, & Practices

- Recruitment plan for new hires and interns
- Selection process for new hires and interns
- Training and career development programs
- Performance incentives/awards programs
- Merit promotion policy and procedures
- Process for selecting staff for managerial details
- Reasonable accommodation procedures

Examples of Barriers

- Single-source or limited-source recruiting.
- Hiring laterally at higher grades, as opposed to hiring at entry level.
- Use of overly narrow selection criteria, e.g., highly specialized / exotic experience requirements that potential applicants not likely to have.
- Biased/hostile attitude of management.

Step 3 – Barrier Elimination

- Establish a plan of action to address the problem identified.
- Treat the root cause of the symptom, not the symptom itself.
- Report action plans to eliminate barriers in Part I of MD-715 report.

What Constitutes A "Good" Plan In Part I?

- Identify all evidence (documents and interviews) that you have considered.
- Assign responsibility to the appropriate management official.
- Specifically state the policy, procedure, and/or practice for each barrier.
- Establish planned activities that will correct the identified barriers, including realistic target dates.

Step 4 – Assess Success of Plan

- Barrier analyses and action plans must be updated each year in Part I of the MD-715 report.
- Set forth accomplishments and revisions to plan, including achieved and/or revised due dates.
- Report if action taken has inadvertently created a new trigger.
- Progress should be measurable and agency officials held accountable.

Is the Plan Successful?

- We usually cannot determine if an action plan was successful over the course of a single reporting cycle.

We usually need several years to gauge the results.

Some Indicators of Success:

- Did participation rates increase?
- Did separation rates decrease?
- Did the number of EEO complaints decrease?
- Do survey results show improving worker morale?
- Did former workers give favorable exit interviews?
- Did productivity improve?
