

DOD DNGB Vermont National Guard

For period covering October 1, 2019 to September 30, 2020

PART A Department or Agency Identifying Information	1. Agency	1. DOD DNGB Vermont National Guard		
	1.a 2nd level reporting component			
	2. Address	2. 789 Vermont National Guard Road		
	3. City, State, Zip Code	3. Colchester, VT 05446		
	4. Agency Code 5. FIPS code(s)	4. NGVT	5. 50007	

PART B Total Employment	1. Enter total number of permanent full-time and part-time employees	1. 404
	2. Enter total number of temporary employees	2. 47
	3. TOTAL EMPLOYMENT [add lines B 1 through 2]	4. 451

PART C Agency Official(s) Responsible For Oversight of EEO Program(s)	Title Type	Name	Title
		Head of Agency	MG Gregory C. Knight
	Head of Agency Designee	COL Paul Rowe	Human Resources Officer
	Principal EEO Director/Official	Duffy Jamieson	State Equal Employment Manager
	Affirmative Employment Program Manager	Duffy Jamieson	State Equal Employment Manager
	Complaint Processing Program Manager	Duffy Jamieson	State Equal Employment Manager
	Diversity & Inclusion Officer	Col Diane Roberts	Diversity & Inclusion Officer
	Hispanic Program Manager (SEPM)	SGT Alejandra Caballero	Human Resource Specialist
	Women's Program Manager (SEPM)	MAJ Sarah Palhete	Executive Officer
	Women's Program Manager (SEPM)	SSG Trisha Emmons	Human Resources NCO
	Women's Program Manager (SEPM)	CW2 Megan Passamoni	HR Tech
	Disability Program Manager (SEPM)	Lauren Hanehan	Human Resource Specialist
	Special Placement Program Coordinator (Individuals with Disabilities)	Duffy Jamieson	State Equal Employment Manager
	Reasonable Accommodation Program Manager	Lauren Hanehan	Human Resource Specialist
	Anti-Harassment Program Manager	Rick Brehm	HR Labor Relations Manager
	ADR Program Manager	Duffy Jamieson	State Equal Employment Manager
	Compliance Manager	Duffy Jamieson	State Equal Employment Manager
	Principal MD-715 Preparer	Duffy Jamieson	State Equal Employment Manager

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PART D List of Subordinate Components Covered in This Report	Subordinate Component and Location (City/State)	Country	Agency Code
EEOC FORMS and Documents	Required	Uploaded	
Alternative Dispute Resolution Procedures	Y	Y	
Anti-Harassment Policy and Procedures	Y	Y	
EEO Policy Statement	Y	Y	
Agency Strategic Plan	Y	Y	
Organization Chart	Y	Y	
Reasonable Accommodation Procedure	Y	Y	
Personal Assistance Services Procedures	Y	Y	
Human Capital Strategic Plan	N	N	
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	N	N	
Disabled Veterans Affirmative Action Program (DVAAP) Report	N	N	
Diversity Policy Statement	N	N	
EEO Strategic Plan	N	N	
Federal Equal Opportunity Recruitment Program (FEORP) Report	N	N	

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EXECUTIVE SUMMARY: MISSION

The Vermont National Guard (VTNG) provides the State and Federal authorities a reliable military force ready to respond to a wide range of foreign and domestic operations. We are an organization committed to building and maintaining a diverse workforce because those principles are critical for executing our missions and integral to our values. To that end, we welcome people from all backgrounds and embrace their differences. We are steadfast in our belief that creating, promoting, and maintaining understanding and tolerance will increase our effectiveness. To foster an atmosphere of inclusiveness, we continue to develop and communicate policies, workshops, and other activities that promote understanding, and discourage intolerance and discrimination.

The VTNG is made up of the Air National Guard (The 158th Fighter Wing) and the Army National Guard. The 158th Fighter Wing has a total strength of approximately 1000 total Members, of which approximately 555 are Drill Status Members, who drill on the weekends. The Army National Guard consists of three Brigade level Commands and one State Headquarters Command. The four commands are the 86th Infantry Brigade Combat Team (Mountain), the Garrison Support Command, 124th Regional Training Institute, and the Joint Force Headquarters. The Army National Guard has a total strength of approximately 2,193 members. Approximately, 1,926 of those members are Traditional Soldiers who drill on the weekends. For the military Air and Army Guard Members, equal opportunity is promoted and enforced through three Military Equal Opportunity (MEO) professionals at the Wing, and four Equal Opportunity Advisors (EOAs) and over 40 Equal Opportunity Leaders (EOLs) in the Army.

Although a military organization, the VTNG has employees. As of September 30, 2020, its full-time staff consisted of 404 permanent and 47 temporary federal employees. Recently, 12% of its full-time Title 32 positions were transitioned into Title 5 positions, which do not require military membership. There are currently 91 Title 5 employees, with approximately 12% of those employees identifying themselves as being disabled. The remainder of the full-time force is predominantly made up of dual-status technicians (Title 32 Technicians) and Active Guard Reserve (AGR) personnel.

The State Equal Employment Manager (SEEM) is responsible for all EO/EEO matters. The SEEM has direct access to the head of the agency, which is the Adjutant General (TAG), at all times. As the director of all equal opportunity operations, the SEEM creates EO policies that are issued by TAG. The SEEM also manages all the equal opportunity programs, including the complaint process and seven Special Emphasis Programs. The seven programs are led by Guard Members and include: the LGBTQ program, the Asian-American & Pacific Islanders Program, the Black Employment Program, the Federal Women's Program, the Hispanic Employee Program, the Individuals with Disability Program, and the Days of Remembrance Program. The SEEM collaborates with the Air Guard's MEOs and Army Guard's EOAs.

An important aspect of VTNG's EO program is the Joint Diversity Executive Council (JDEC). JDEC is chaired by TAG and managed by the Director of the Joint Staff. VTNG has a published State Diversity Strategic Plan that JDEC oversees to ensure that strategic objectives are met. The strategic objectives of the military force are connected with the diversity objectives of the full-time force with the goal to include a diversified civilian representation. JDEC issues a Bi-Annual Newsletter that includes articles on diversity and information about the organization's EO policies.

In addition to JDEC, updates on the EO/EEO program are provided to Senior Officials on the effectiveness, efficiency, and legal compliance of the agency's EEO program. A "State of the Agency" brief is scheduled annually with the agency head to provide information on the annual reports and recommendations to eliminate any barriers identified. The Joint Senior Leader Council consults with HRO to ensure policies, procedures, and practices are supporting equality of opportunity for all groups of employees or applicants.

The SEEM communicates regularly with HRO Benefits and Labor Relations specialist to monitor trends in the areas of the Employee Awards, Development and Training Program, as well as the compliance of the Merit Systems Protection Board and Labor Relations findings.

All federal employees are required to complete the Anti-Discrimination On-Line Training within the first 30 days of employment and refresher training as required. This is monitored in Military & Civilian Automated Personnel Systems. The VTNG is compliant in reporting all substantiated incidents of sexual harassment involving members of the Armed Forces for the preceding fiscal year in accordance with Public Law 112-239, 126 STAT. 1764, Section 579(b). Vermont also reports the same data as well as Sexual Assault Program data to the Vermont Legislature in accordance with the Vermont Statutes Annotated title 20, §427, "Sexual Assault and Sexual Harassment Report."

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VTNG uses EEO Counselors to help ensure compliance with employment discrimination laws. The EEO Counselors must receive their initial certification training and annual eight hour refresher training. Our SEPM for the disability program receives, addresses, and monitors requests for reasonable accommodations and requests for personal assistance services. No EEO complaints and no requests for accommodations were made in FY 2020.

The SEEM partners with the Judge Advocate General Corps (JAG) when processing formal complaints to ensure compliance with time frames set by EEOC. The JAG assists the SEEM when coordinating EEO Investigators and ensure that the adjudication function of its complaint resolution process are separate from its legal defense arm of the agency. The SEEM maintains a tracking system for all complaints. All Managers/Supervisors receive alternative dispute resolution training as part of the Anti-Discrimination Training content and when they receive their Supervisor Training. The Agency ADR Policy is posted on internal web sites.

Policies pertaining to the prevention of sexual harassment, equal opportunity/equal employment opportunity, and the complaint procedures are maintained on VTNG web sites and on bulletin boards throughout the organization. Employees are provided a copy of the complaint policy which also provides contact information for the SEEM and EEO counselor. Supervisory training is conducted within the first year of appointment. The training covers polices and provides practical exercises to assist supervisors and managers on how to resolve conflicts.

With respect to our military force, except for women, the VTNG's demographics reflect Vermont's labor pool. Vermont's census data indicates that more than 90% of its population is Caucasian. Due to the low number of racial minorities in the state, it is difficult to assess any trends.

With respect to our technician workforce, the average number of women in those positions is higher than compared to the military components of the Air and Army National Guard. Women make up close to 20% of the total workforce, with about 22% holding positions as officials and managers. More growth is needed in the highest senior military grades (GS-13 to 15). The Vermont National Guard Military Women's Program, continues to develop barrier analysis and recommend initiatives for improved representation. This past fiscal year, the VTNG has been examining child care issues, made an affinity group available for women in combat, participated in study on pregnancy and promotion, and issued a revised policy on milk expression.

The SEEM preparing this report is still relatively new to the position, having started in April 2020. The prior SEEM held the position for a little more than a year, replacing someone who had been in the position for more than a decade. The SEEM has used the 2020 EEOC Form 715-01 Parts A-J as required by the MD 715 for a workforce population of less than 500 employees. It will post the FedSEP automatically generated Affirmative Action Plan on the agencies external website as required.

The VTNG appreciates the opportunity to provide this report as one way to demonstrate its commitment to diversity, the EEO laws, and the promotion of equal opportunity in its workforce.

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**CERTIFICATION of ESTABLISHMENT of CONTINUING
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS**

[Redacted] am the
(Insert Name Above) (Insert official title/series/grade above)

Principal EEO Director/Official for

[Redacted]
(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.

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

Date

Signature of Agency Head or Agency Head Designee



Date

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Agency Self-Assessment Checklist



Essential Element: A Demonstrated Commitment From agency Leadership

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	A.1. The agency issues an effective, up-to-date EEO policy statement.				
A.1.a. 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)]		X			While the last policy was issued on letterhead on September 15, 2019, a revised policy was drafted in August 2020. The annual issuance date was missed due to staffing issues and other projects. The policy is currently being staffed (reviewed by leadership) for agency approval. It is expected to be released in April 2020. 9/15/2019
A.1.b. Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)] If the EEO policy statement covers any additional bases (e.g., marital status, veteran status and political affiliation), please list them in the comments column.		X			

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	A.2. The agency has communicated EEO policies and procedures to all employees.				
A.2.a. Does the agency disseminate the following policies and procedures to all employees:					
A.2.a.1. Anti-harassment policy? [see MD 715, II(A)]		X			Issued on February 1, 2021.
A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]		X			The policy is currently being staffed (reviewed by leadership).
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)]		X			Certain contacts are posted prominently (e.g. contact information for the SEEM and the HREO). Other contact information needs to be updated (e.g. EEO counselor contact information).
A.2.b.2. Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 CFR §1614.102(b)(5)]		X			These items are on bulletin boards and the VTNG's website.
A.2.b.3. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.			X		We are waiting approval of our policy. Once approved, it will be posted on the VTNG's website.
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 and the means by which such training is delivered.		X			This information is on bulletin boards and the internet.
A.2.c.2. ADR process? [see MD-110, Ch. 3(II)(C)] If "yes", please provide how often.		X			This information is on the internet.
A.2.c.3. Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If "yes", please provide how often.			X		A new policy and procedure is just about to be issued. When it does, it will be posted on the internet.

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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.	X			The policy is posted on the internet.			
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.	X			The policy is posted on the internet.			
 Compliance Indicator	A.3. The agency assesses and ensures EEO principles are part of its culture.			Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures							
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. .	X			External EO award nominations and awards, military coins, newsletters, Facebook, and website.			
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]	X			Inspector General Survey for all VTNG to include full time employees, Military service members utilize assessment tool annually. These reports are used to identify job satisfaction and trust in the organization holistically.			

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

 Compliance Indicator	 Measures	Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
	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.		X		The SEEM is administratively managed by HR, but has direct access to TAG, who is the Head of Agency. Discussions have been held to formalize the reporting structure.
	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)]		X		Human Resources Officer
	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.	X			
	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)]	X			
	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]	X			
	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.	X			Starting on November 18, 2020, and once a month thereafter, the Joint Diversity Executive Council (which included leadership) began meeting to discuss revisions to VTNG strategic plan which included a discussion of the "State of the agency" and the six essential elements of the model EEO program.
	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)]	X			

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	B.2. The EEO Director controls all aspects of the EEO program.				
	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)] If not, identify the office with this authority in the comments column.	X			
	B.2.b. Is the EEO Director responsible for overseeing the completion of EEO counseling? [see 29 CFR §1614.102(c)(4)]	X			
	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.]	X			
	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.]	X			
	B.2.e. Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	X			
	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)]	X			
	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); (c)(3)]			X	The agency does not have subordinate level components staffed with federal employees.

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		Yes	No	N/A	
 Measures	B.3. The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.				
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)]		X			
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.		X			Goal #3 of the Strategic Plan for FY20-20 is to foster a values based culture. The intent is: An organization of values based professionals that creates an environment of transparency, mutual trust, inclusion, and empowerment.

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		Yes	No	N/A	
	B.4. The agency has sufficient budget and staffing to support the success of its EEO program.				
	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)]	X			
	B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]	X			
	B.4.a.11. to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	X			
	B.4.a.2. to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	X			
	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)]	X			
	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.	X			
	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)]	X			
	B.4.a.6. to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	X			
	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.	X			
	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]	X			
	B.4.a.9. to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I; EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C. 1]	X			
	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)]	X			ARNG provides 2065 O&M Funds, SAG 131
	B.4.c. Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	X			
	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?	X			
	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?	X			

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	B.5. The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills				
B.5.a. Pursuant to 29 CFR §1614.102(a)(5), have all managers and supervisors received orientation, training, and advice on their responsibilities under the following areas under the agency EEO program:					
B.5.a.1. EEO complaint process? [see MD-715(II)(B)]			X		Military supervisors receive annual training covering these topics. Civilian managers will be trained in 2021.
B.5.a.2. Reasonable Accommodation Procedures? [see 29 CFR § 1614.102(d)(3)]			X		Military supervisors receive annual training covering these topics. Civilian managers will be trained in 2021.
B.5.a.3. Anti-harassment policy? [see MD-715(II)(B)]			X		Military supervisors receive annual training covering these topics. Civilian managers will be trained in 2021.
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)]			X		Military supervisors receive annual training covering these topics. Civilian managers will be trained in 2021.
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)]			X		Military supervisors receive annual training covering these topics. Civilian managers will be trained in 2021.

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	B.6. The agency involves managers in the implementation of its EEO program.				
	B.6.a. Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	X			
	B.6.b. Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	X			
	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]	X			
	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)]	X			

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Essential Element: C Management and Program Accountability

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	C.1. The agency conducts regular internal audits of its component and field offices.				
	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.	X			The VTNG conducts an Annual Organization Inspection Program in September.
	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.	X			The VTNG conducts an Annual Organization Inspection Program in September.
	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)]	X			

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		Yes	No	N/A	
	C.2. The agency has established procedures to prevent all forms of EEO discrimination.				
	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)]	X			
	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]	X			
	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)]	X			
	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)]	X			
	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.]	X			
	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 Complainant v. Dep't of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dep't of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.	X			
	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)]	X			
	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)]	X			
	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)]	X			
	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)]	X			
	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)]	X			
	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)]	X			
	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, 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, excluding ongoing interpretative services, in the comments column.	X			
	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)]	X			

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C.2.c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.



X

The policy is currently under review. It will be published on the VTNG's website at: <https://vt.public.ng.mil/Resources/Equal-Employment-Opportunity/>

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	C.3. The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.				
	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?		X		A new evaluation policy will need to be developed and analyzed. The current evaluation system is based on goals. It is an open-ended narrative where goals are identified by the employee, approved by the supervisor, self-evaluated by the employer, and commented by the supervisor.
	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.I]		X		The evaluation system used by the VTNG is based on goals. The employee recommends the goals, and the supervisor approves it. Subsequently, the employee states whether he or she obtained the goals and the manager provides feedback on the goals.

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<p>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)]</p>		<p>X</p>	<p>The evaluation system used by the VTNG is based on goals. The employee recommends the goals, and the supervisor approves it. Subsequently, the employee states whether he or she obtained the goals and the manager provides feedback on the goals.</p>
<p>C.3.b.3. Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]</p>		<p>X</p>	<p>The evaluation system used by the VTNG is based on goals. The employee recommends the goals, and the supervisor approves it. Subsequently, the employee states whether he or she obtained the goals and the manager provides feedback on the goals.</p>
<p>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]</p>		<p>X</p>	<p>The evaluation system used by the VTNG is based on goals. The employee recommends the goals, and the supervisor approves it. Subsequently, the employee states whether he or she obtained the goals and the manager provides feedback on the goals.</p>
<p>C.3.b.5. Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]</p>		<p>X</p>	<p>The evaluation system used by the VTNG is based on goals. The employee recommends the goals, and the supervisor approves it. Subsequently, the employee states whether he or she obtained the goals and the manager provides feedback on the goals.</p>

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<p>C.3.b.6. Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]</p>		<p>X</p>	<p>The evaluation system used by the VTNG is based on goals. The employee recommends the goals, and the supervisor approves it. Subsequently, the employee states whether he or she obtained the goals and the manager provides feedback on the goals.</p>
<p>C.3.b.7. Support the EEO program in identifying and removing barriers to equal opportunity?. [see MD-715, II(C)]</p>		<p>X</p>	<p>The evaluation system used by the VTNG is based on goals. The employee recommends the goals, and the supervisor approves it. Subsequently, the employee states whether he or she obtained the goals and the manager provides feedback on the goals.</p>
<p>C.3.b.8. Support the anti-harassment program in investigating and correcting harassing conduct?. [see Enforcement Guidance, V.C.2]</p>		<p>X</p>	<p>The evaluation system used by the VTNG is based on goals. The employee recommends the goals, and the supervisor approves it. Subsequently, the employee states whether he or she obtained the goals and the manager provides feedback on the goals.</p>
<p>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)]</p>		<p>X</p>	<p>If this was an issue, it would be included on the evaluation.</p>
<p>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)]</p>	<p>X</p>		
<p>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)]</p>	<p>X</p>		

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	C.4. The agency ensures effective coordination between its EEO program and Human Resources (HR) program.				
	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)]	X			
	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]	X			
	C.4.c. Does the EEO office have timely access to accurate and complete data (e.g., demographic data for the workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	X			
	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)]	X			
	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)]	X			
	C.4.e.2. Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	X			
	C.4.e.3. Develop and/or provide training for managers and employees? [see MD-715, II(C)]	X			
	C.4.e.4. Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	X			
	C.4.e.5. Assist in preparing the MD-715 report? [see MD-715, II(C)]	X			
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures	C.5. Following a finding of discrimination, the agency explores whether it should take a disciplinary action.	Yes	No	N/A	
	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 Douglas v. Veterans Administration, 5 MSPR 280 (1981)]	X			
	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.	X			No discriminatory EEO conduct reported in FY20.
	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 (e.g., post mortem to discuss lessons learned)? [see MD-715, II(C)]			X	It would, but there were no findings in FY 2020.

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	C.6. The EEO office advises managers/supervisors on EEO matters.				
	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 MD-715 Instructions, Sec. I] If "yes", please identify the frequency of the EEO updates in the comments column.	X			Quarterly JDEC meetings, Bi-annual JDEC Newsletter, Annual Supervisor Training, TAG Annual Brief, Army & Air Annual EO Reports.
	C.6.b. Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I]	X			

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Essential Element: D Proactive Prevention

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	D.1. The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.				
D.1.a. Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]		X			
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; and/or external special interest groups? [see MD-715 Instructions, Sec. I]		X			
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)]			X		A plan is being discussed to provide anonymous surveys for employees who separate from the VTNG.

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	D.2. The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)				
	D.2.a. Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	X			
	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)]	X			
	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)]	X			
	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, and/or external special interest groups? [see MD-715 Instructions, Sec. I]] If "yes", please identify the data sources in the comments column.	X			DEOCS, AAR, Case files, quarterly meetings with SEPM, Org Inspection Program Checklist, Event feedback forms. Currently, we are also revising the strategic plan which includes regular meetings with leaders to examine all aspect of the VTNG's diversity and inclusion efforts.
 Compliance Indicator	D.3. The agency establishes appropriate action plans to remove identified barriers.	Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	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)]	X			
	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)]	X			
	D.3.c. Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	X			

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	D.4. The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.				
	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.	X			https://vt.public.ng.mil/Resources/Organizational-Resources/Equal-Employment-Opportunity/
	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)]	X			Title 5 job announcements are made on the USAjobs.gov site. On the job postings , information is provided regarding the reasonable accommodation policy.
	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)]	X			
	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)]	X			Title 5 jobs are posted on USAJobs and provide information about reasonable accommodations. Some jobs provide preference to veterans, with disabilities.

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Essential Element: E Efficiency

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	E.1. The agency maintains an efficient, fair, and impartial complaint resolution process.				
E.1.a. Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?		X			
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)?		X			
E.1.c. Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?		X			
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(I)? If so, please provide the average processing time in the comments.		X			No EEO complaints filed in FY.
E.1.e. Does the agency ensure that 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)?		X			
E.1.f. Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?		X			
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)?				X	No EEO complaints were filed in FY20.
E.1.h. When the complainant did not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?				X	No EEO complaints were filed in FY20.
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)?				X	No EEO complaints were filed in FY20.
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 work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comments column.				X	Contractors have not been used.
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)]		X			
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)]				X	It would. However, no EEO complaints were filed in FY20.

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	E.2. The agency has a neutral EEO process.			N/A	
	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)] If "yes", please explain.	X			Will utilize NGB for legal sufficiency reviews as required.
	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.	X			Will utilize NGB for legal sufficiency reviews as required.
	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)]	X			Will utilize NGB for firewall as required.
	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)]	X			
	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, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004)]	X			
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	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)]	X			Agency relies on CNGM 0402.01
	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)]	X			
	E.3.c. Does the Agency encourage all employees to use ADR, where ADR is appropriate? [See MD-110, Ch. 3(IV)(C)]	X			
	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)]	X			
	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)]	X			
	E.3.f. Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	X			

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	E.4. The agency has effective and accurate data collection systems in place to evaluate its EEO program.				
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)]		X			
E.4.a.2. The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]		X			
E.4.a.3. Recruitment activities? [see MD-715, II(E)]		X			
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)]		X			NGB EO provides applicant flow data to the States individually from USA Jobs.
E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]		X			
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]		X			
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]		X			

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	E.5. The agency identifies and disseminates significant trends and best practices in its EEO program.				
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.		X			The VTNG has used Inspector General surveys, Military Climate Assessments, and updates from SEPMS. Data, like from No Fear reports, are publicized on the website. Complaint and inquiry data is maintained.
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.		X			The VTNG SEEM program is part of Region 1 (which is made up of several New England states). There are routine meetings when information is exchanged.
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)]		X			NGB collects data from all National Guard organizations and publicizes it. SEEM Region 1 meetings also informally help the VTNG make comparisons.

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Essential Element: F Responsiveness and Legal Compliance

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	F.1. The agency has processes in place to ensure timely and full compliance with EEOC orders and settlement agreements.	Yes	No	N/A	
	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)]	X			
	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)]	X			
	F.1.c. Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	X			
	F.1.d. Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	X			
	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)]	X			
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures	F.2. The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Yes	No	N/A	
	F.2.a. Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	X			However, no EEO complaints were filed in FY 20.
	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)]	X			No EEO complaints were filed in FY 20.
	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]	X			No EEO complaints were filed in FY 20.
	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)]	X			No EEO complaints were filed in FY 20.
	F.2.a.4. Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	X			No EEO complaints were filed in FY 20.

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Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	F.3. The agency reports to EEOC its program efforts and accomplishments.				
	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)]	X			
	F.3.b. Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	X			

Essential Element: Other

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Plan to Attain Essential Elements

PART H.1

Brief Description of Program Deficiency: A.2.c.3. Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If "yes", please provide how often.

The reasonable accommodation policy is being circulated for leadership review and approval. Once approved, it will be circulated and posted.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/08/2021	05/21/2021			The reasonable accommodation policy is being circulated for leadership review and approval.

Responsible Officials

Title	Name	Standards Address the Plan?
SEEM	Duffy Jamieson	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
04/08/2021	Continue staffing of the policy	Yes		

Accomplishments

Fiscal Year	Accomplishment
2021	The policy has been written and is being circulated for approval by leadership.

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Plan to Attain Essential Elements

PART H.2

Brief Description of Program Deficiency: A.2.b.3. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.
The reasonable accommodation policy is being circulated for leadership review and approval.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
07/30/2020	02/01/2021	04/30/2021		Have a final policy circulated and published by April 30, 2021.

Responsible Officials

Title	Name	Standards Address the Plan?
SEEM	Duffy Jamieson	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
02/01/2021	Initiate contact with the EEOC in the fall. Leave time for any additional revisions. Post policy once approved.	Yes	02/01/2020	
04/30/2021	Circulate and post approved policy.	Yes	04/30/2021	

Accomplishments

Fiscal Year	Accomplishment

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Plan to Attain Essential Elements

PART H.3

Brief Description of Program Deficiency:

B.5.a.3. Anti-harassment policy? [see MD-715(II)(B)]

Military leaders are trained in some of these areas. Those leaders may supervise civilian employees. Civilian leaders are not routinely trained. The plan is to conduct supervisor training in FY 2021.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/08/2021	09/30/2021			Military leaders are trained in some of these areas. Those leaders may supervise civilian employees. Civilian leaders are not routinely trained. The plan is to conduct supervisor training in FY 2021.

Responsible Officials

Title	Name	Standards Address the Plan?
SEEM	Duffy Jamieson	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	Military leaders are trained in some of these areas. Those leaders may supervise civilian employees. Civilian leaders are not routinely trained. The plan is to conduct supervisor training in FY 2021.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2021	Policies have been written.

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Plan to Attain Essential Elements

PART H.4

Brief Description of Program Deficiency:

B.5.a.1. EEO complaint process? [see MD-715(II)(B)]

Military leaders are trained in some of these areas. Those leaders may supervise civilian employees. Civilian leaders are not routinely trained. The plan is to conduct supervisor training in FY 2021.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/08/2021	09/30/2021			Military leaders are trained in some of these areas. Those leaders may supervise civilian employees. Civilian leaders are not routinely trained. The plan is to conduct supervisor training in FY 2021.

Responsible Officials

Title	Name	Standards Address the Plan?
SEEM	Duffy Jamieson	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
04/08/2021	Military leaders are trained in some of these areas. Those leaders may supervise civilian employees. Civilian leaders are not routinely trained. The plan is to conduct supervisor training in FY 2021.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2021	Policies have been written.

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Plan to Attain Essential Elements

PART H.5

Brief Description of Program
Deficiency:

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)]

Military leaders are trained in some of these areas. Those leaders may supervise civilian employees. Civilian leaders are not routinely trained. The plan is to conduct supervisor training in FY 2021.

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Plan to Attain Essential Elements

PART H.6

Brief Description of Program Deficiency:

B.5.a.2. Reasonable Accommodation Procedures? [see 29 CFR § 1614.102(d)(3)]

Military leaders are trained in some of these areas. Those leaders may supervise civilian employees. Civilian leaders are not routinely trained. The plan is to conduct supervisor training in FY 2021.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/08/2021	09/30/2021			Military leaders are trained in some of these areas. Those leaders may supervise civilian employees. Civilian leaders are not routinely trained. The plan is to conduct supervisor training in FY 2021.

Responsible Officials

Title	Name	Standards Address the Plan?
SEEM	Duffy Jamieson	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	Military leaders are trained in some of these areas. Those leaders may supervise civilian employees. Civilian leaders are not routinely trained. The plan is to conduct supervisor training in FY 2021.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2021	Policies have been written.

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Plan to Attain Essential Elements

PART H.7

Brief Description of Program Deficiency: 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)]

Military leaders are trained in some of these areas. Those leaders may supervise civilian employees. Civilian leaders are not routinely trained. The plan is to conduct supervisor training in FY 2021.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/08/2021	09/30/2021			Military leaders are trained in some of these areas. Those leaders may supervise civilian employees. Civilian leaders are not routinely trained. The plan is to conduct supervisor training in FY 2021.

Responsible Officials

Title	Name	Standards Address the Plan?
SEEM	Duffy Jamieson	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	Military leaders are trained in some of these areas. Those leaders may supervise civilian employees. Civilian leaders are not routinely trained. The plan is to conduct supervisor training in FY 2021.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2021	Policies have been written.

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Plan to Attain Essential Elements

PART H.8

Brief Description of Program Deficiency: 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)]

VTNG State Equal Employment Manager immediate supervisor is the Human Resource Officer and not the agency head.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
07/23/2019	03/01/2020	06/01/2021		Agency determining the best way to have EO Director to directly report to the agency head.

Responsible Officials

Title	Name	Standards Address the Plan?
CPT Kurt Kafferlin	State Judge Advocate	No
VT Human Resource Officer	COL Paul Rowe	No
VT State Equal Employment Manager	Duffy Jamieson	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
03/01/2021	Determine EEO Director (State Equal Employment Manager - SEEM) alignment on Technician manning, align performance hierarchy as appropriate. Further discussions to determine how evaluations can ben conducted for the SEEM if reporting to TAG.	Yes	06/01/2021	

Accomplishments

Fiscal Year	Accomplishment
2019	The SEEM has direct access to the Agency Head.

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Plan to Attain Essential Elements

PART H.9

Brief Description of Program Deficiency: C.3.b.6. Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]

The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/08/2021	09/30/2021			The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.

Responsible Officials

Title	Name	Standards Address the Plan?
SEEM	Duffy Jamieson	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2021	The appraisal system was reviewed.

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Plan to Attain Essential Elements

PART H.10

Brief Description of Program Deficiency:	C.3.b.5. Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]
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The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/08/2021	09/30/2021			The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.

Responsible Officials

Title	Name	Standards Address the Plan?
SEEM	Duffy Jamieson	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2021	The appraisal system was reviewed.

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Plan to Attain Essential Elements

PART H.11

Brief Description of Program Deficiency:	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)]
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The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/08/2021	09/30/2021			The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.

Responsible Officials

Title	Name	Standards Address the Plan?
SEEM	Duffy Jamieson	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2021	The appraisal system has been reviewed.

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Plan to Attain Essential Elements

PART H.12

Brief Description of Program Deficiency:

C.3.b.3. Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]

The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/08/2021	09/30/2021			The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.

Responsible Officials

Title	Name	Standards Address the Plan?
SEEM	Duffy Jamieson	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies..	Yes		

Accomplishments

Fiscal Year	Accomplishment
2021	The appraisal system has been reviewed.

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Plan to Attain Essential Elements

PART H.13

Brief Description of Program Deficiency:

C.3.b.7. Support the EEO program in identifying and removing barriers to equal opportunity?. [see MD-715, II(C)]

The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/08/2021	09/30/2021			The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.

Responsible Officials

Title	Name	Standards Address the Plan?
SEEM	Duffy Jamieson	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2021	The appraisal system was reviewed.

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Plan to Attain Essential Elements

PART H.14

Brief Description of Program Deficiency: 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)]

The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/08/2021	09/30/2021			The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.

Responsible Officials

Title	Name	Standards Address the Plan?
SEEM	Duffy Jamieson	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
04/08/2021	The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2021	The appraisal system was reviewed.

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Plan to Attain Essential Elements

PART H.15

Brief Description of Program Deficiency: 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]

The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/08/2021	09/30/2021			The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies..

Responsible Officials

Title	Name	Standards Address the Plan?
SEEM	Duffy Jamieson	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2021	The appraisal system has been reviewed.

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Plan to Attain Essential Elements

PART H.16

Brief Description of Program Deficiency: C.3.b.8. Support the anti-harassment program in investigating and correcting harassing conduct?. [see Enforcement Guidance, V.C.2]

The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/08/2021	09/30/2021			The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.

Responsible Officials

Title	Name	Standards Address the Plan?
SEEM	Duffy Jamieson	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2021	The appraisal system was reviewed.

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Plan to Attain Essential Elements

PART H.17

Brief Description of Program Deficiency:

C.3.b.1. Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]

The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/08/2021	09/30/2021			The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.

Responsible Officials

Title	Name	Standards Address the Plan?
SEEM	Duffy Jamieson	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	The performance appraisals used by the VTNG are based on goals. The goals are suggested by the employee and approved by the supervisor. This appraisal system does not lend itself to adding specific questions. The system will be reviewed and compared to other systems used by similar agencies.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2021	The appraisal system was reviewed.

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Plan to Attain Essential Elements

PART H.18

Brief Description of Program Deficiency: 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?
VTNG has not established a consistent evaluation element for all supervisors to include in their performance appraisals.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
02/21/2018	09/01/2021	07/23/2020		Draft a stock evaluation element for all supervisors to include on performance appraisals.

Responsible Officials

Title	Name	Standards Address the Plan?
Human Resource Officer	COL Paul Rowe	No
VT State Equal Employment Manager	Duffy Jamieson	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
04/01/2021	Coordinate with HRO offices to create stock evaluation element. Determine how those elements can be added to the evaluation.	Yes	09/01/2021	

Accomplishments

Fiscal Year	Accomplishment
2020	SEEM has discussed with the HRO Director how to accomplish this objective. The evaluation process does not lend itself well to this change because the evaluation is goal based. More review needs to be conducted.

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Plan to Attain Essential Elements

PART H.19

Brief Description of Program Deficiency: 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)]

Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
07/23/2019	10/01/2019	08/01/2021		Meet with Governor's Committee on Employment of Persons with Disabilities to provide training and resources for applying to federal positions on USA jobs.

Responsible Officials

Title	Name	Standards Address the Plan?
VT State Equal Employment Manager	Duffy Jamieson	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
02/01/2021	Contact the Governor's Committee. Develop a working relationship. Identify jobs that may be an appropriate fit.	Yes	08/01/2021	

Accomplishments

Fiscal Year	Accomplishment
2020	Coordination with the Governor's Committee was not accomplished. The SEEM was still relatively new to the position. COVID made establishing relationships more difficult. Still reviewing positions for PWD.

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Plan to Attain Essential Elements

PART H.20

Brief Description of Program Deficiency: 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)]

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 its goals?

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/07/2021	10/01/2021			Identify positions and work with community groups to have PWD work at the VTNG

Responsible Officials

Title	Name	Standards Address the Plan?
VT State Equal Employment Manager	Duffy Jamieson	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	Identify positions and create community contacts to have PWD work at the VTNG.	Yes		

Accomplishments

Fiscal Year	Accomplishment
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Plan to Attain Essential Elements

PART H.21

Brief Description of Program Deficiency: 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)]

VTNG has not established a consistent exit interview process to question how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
02/21/2018	04/01/2021	09/30/2021		Create exit interview process to survey technicians who leave the agency. The plan will include how to capture data, analyze date and report format to build action plans.

Responsible Officials

Title	Name	Standards Address the Plan?
COL Paul Rowe	Human Resource Officer	No
Duffy Jamieson	State Equal Employment Manager	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
10/01/2019	Meet with other HRO staff sections to develop exit interview plan.	Yes		
04/01/2021	Meet with HRO staff to develop exit interview plan.	Yes		
06/01/2021	Better understand the exit interview process. Are exit interviews conducted? When are they done? Who does them? What forms are used? Where is that date maintained?	Yes		

Accomplishments

Fiscal Year	Accomplishment
2020	One idea generated is to have anonymous questionnaires available to staff as they are separating that can be sent in or dropped off.

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Plan to Eliminate Identified Barriers

PART I.1

Source of the Trigger:	Workforce Data (if so identify the table)	
Specific Workforce Data Table:	Workforce Data Table - A1	
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Women are under-represented.	
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> All Women	
Barrier Analysis Process Completed?:	Y	
Barrier(s) Identified?:	Y	
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Barrier Name	Description of Policy, Procedure, or Practice
	Recruitment and Retention	Military opportunities must be seen as inclusive. Leadership opportunities need to be developed.

Objective(s) and Dates for EEO Plan

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
04/08/2021	09/30/2021	Yes			Develop a strategic plan to recruit and retain more women.

Responsible Official(s)

Title	Name	Standards Address The Plan?
SEEM	Duffy Jamieson	Yes

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	Create and distribute a strategic plan to recruit and retain women.	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments
2020	The strategic plan was identified as being out of date and due for revision.

DOD DNGB Vermont National Guard

For period covering October 1, 2019 to September 30, 2020

Plan to Eliminate Identified Barriers

[Empty content area for reporting identified barriers and elimination plans]

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 persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

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 disabilities and persons with 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 text box.

- | | | |
|-------------------------------|--------|-----|
| a.Cluster GS-1 to GS-10 (PWD) | Answer | Yes |
| b.Cluster GS-11 to SES (PWD) | Answer | Yes |

The Vermont National Guard has both Title 32 and Title 5 employees. The Title 32 employees must be fit for military duty to maintain their maintain their "Monday through Friday" job. The Vermont National Guard has 91 Title 5 employees. Of those employees, 11 self-reported as being disabled. This means that 11.76% of the total Title 5 workforce (who reported) identified as being disabled. The combined Title 32 and Title 5 employees who are disabled from the GS1-10 ranks is approximately 6%. The percentage of GS11-SES employees who are disabled is approximately 10.25%

*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% 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) | Answer | No |
| b.Cluster GS-11 to SES (PWTD) | Answer | Yes |

There are 3 GS-9 employees who identified as being a PWTD. No GS-11 and above identified as being a PWTD. Combining the T32 and the T5 employees, 1.21% of the VTNG employee population indented as having a targeted disability.

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

During the Q4 JDEC meeting, the numbers and goals were reported. It is anticipated that training on the reasonable accommodation policy will be held during FY 21. The goals can be shared as part of that training.

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 & 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.

Answer Yes

Ms. Lauren Hanehan holds the collateral duty appointment as the Vermont Persons with Disabilities Program Manager as of 10/01/2018.

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	
Architectural Barriers Act Compliance	0	0	1	Michael J. Bleau Facility Design and Project Management Specialist, CFMO
Answering questions from the public about hiring authorities that take disability into account	0	0	1	Duffy Jamieson SEEM
Section 508 Compliance	0	0	1	Mikel Archovitch State Public Affairs Officer
Processing applications from PWD and PWTD	0	0	1	Louise Acker HR Specialist (Classification/ Recruit&Placement)
Processing reasonable accommodation requests from applicants and employees	0	0	1	Louise Acker HR Specialist (Classification/ Recruit&Placement)
Special Emphasis Program for PWD and PWTD	0	0	1	Lauren Hanehan PWD SEPM, HRO Benefits

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.

Answer No

Ms. Lauren Hanehan has been trying to attend training. The first year she held the position, there weren't any openings, and this year she was scheduled to attend the week-long PWD SEPM course at DEOMI but it was cancelled due to COVID. We are currently trying to get her signed up for a virtual training.

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

Answer Yes

Section III: Plan to Recruit and Hire Individuals 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 individuals 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 APPLICATIONS WITH DISABILITIES

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

USA Jobs. We also have an outreach team that works with veterans on employment issues.

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

Disabled veterans are given hiring preference.

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.

Veterans who are disabled get points depending on the percentage of their disability.

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.

Answer No

In FY 2020, training was not conducted due to COVID and the fact that the Reasonable Accommodation policy was not completed.

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 SEEM and/or the PWD SEPM will provide community outreach efforts and report quarterly to the Joint Diversity Executive Council where the Agency Head is the Chair.

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) Answer Yes
- b. New Hires for Permanent Workforce (PWTD) Answer No

For FY20, 9 employees identified as being disabled. The VTNG has a combined Title 32 and Title 5 workforce of 451 employees (91 employees are Title 5). Thus, for the Title 5 workforce, 10% of the new hires identified as being disabled. There are 4 Title 5 employees who identified as having a targeted disability (4%).

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for MCO (PWD) Answer N/A
- b. New Hires for MCO (PWTD) Answer N/A

The VTNG employs less than 500 employees. It is our understanding that "mission critical" jobs do not have to be identified for organizations with less than 500 employees.

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Qualified Applicants for MCO (PWD) Answer N/A
- b. Qualified Applicants for MCO (PWTD) Answer N/A

See above. Also, we do not track whether an internal applicant has disclosed a disability. We do not maintain applicant data. We have not surveyed the people who have disclosed a disability to determine whether they have applied for a job.

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Promotions for MCO (PWD) Answer N/A
- b. Promotions for MCO (PWTD) Answer N/A

See above. Also, we do not track whether an internal applicant has disclosed a disability. We do not maintain applicant data. We have not surveyed the people who have disclosed a disability to determine whether they have applied for a job.

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 SEEM and/or the PWD SEPM will analyze staffing data to determine if there are sufficient opportunities for advancement of PWD/PWTD and report quarterly to the Joint Diversity Executive Council, where the Agency Head is the Chair. The SEEM and/or the PWD SEPM will provide recommendations to eliminate identified barriers and report on approved plan of implementation.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

The SEEM and/or the PWD SEPM will promote career development opportunities for PWD / PWTD at trainings and report the results to the Joint Diversity Executive Council, where the Agency Head is the Chair. The PWD SEPM will collaborate with the HR Development Manager to identify professional development opportunities and disseminate those opportunities to PWD / PWTD.

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	0	0	0	0	0	0
Fellowship Programs	0	0	0	0	0	0
Mentoring Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0
Training Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	0	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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWD) Answer N/A
- b. Selections (PWD) Answer N/A

These programs are for military personnel.

4. Do triggers exist for PWTD 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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWTD) Answer N/A
- b. Selections (PWTD) Answer N/A

These programs are for military personnel.

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) Answer No
- b. Awards, Bonuses, & Incentives (PWTD) Answer No

The disability status of an employee who is provided an award, bonus, or incentive is not known.

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) | Answer | No |
| b. Pay Increases (PWTD) | Answer | No |

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) | Answer | N/A |
| b. Other Types of Recognition (PWTD) | Answer | N/A |

Disability status is not know when recognizing employees.

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- | | | |
|--|--------|----|
| a. SES | | |
| i. Qualified Internal Applicants (PWD) | Answer | No |
| ii. Internal Selections (PWD) | Answer | No |
| b. Grade GS-15 | | |
| i. Qualified Internal Applicants (PWD) | Answer | No |
| ii. Internal Selections (PWD) | Answer | No |
| c. Grade GS-14 | | |
| i. Qualified Internal Applicants (PWD) | Answer | No |
| ii. Internal Selections (PWD) | Answer | No |
| d. Grade GS-13 | | |
| i. Qualified Internal Applicants (PWD) | Answer | No |
| ii. Internal Selections (PWD) | Answer | No |

If a Title 5 employee wants to move into a higher paying position, he or she would apply internally. However, his or her disability would not be disclosed. Of the 91 Title 5 positions, 11 people have identified as being disabled - for a total of 12%. We have one GS-15 person, who did not identify as being disabled. This is a military position. We only have 1 GS-14 employee who is Title 5. That person has not identified as being disabled. We have 5 GS-13 employees who hold Title 5 positions, two of those people identified as being disabled. While not conclusive, this data suggest that we do not have triggers.

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- | | | |
|---|--------|----|
| a. SES | | |
| i. Qualified Internal Applicants (PWTD) | Answer | No |
| ii. Internal Selections (PWTD) | Answer | No |
| b. Grade GS-15 | | |
| i. Qualified Internal Applicants (PWTD) | Answer | No |
| ii. Internal Selections (PWTD) | Answer | No |
| c. Grade GS-14 | | |
| i. Qualified Internal Applicants (PWTD) | Answer | No |
| ii. Internal Selections (PWTD) | Answer | No |
| d. Grade GS-13 | | |
| i. Qualified Internal Applicants (PWTD) | Answer | No |

ii. Internal Selections (PWTB)

Answer No

See above.

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWD)

Answer No

b. New Hires to GS-15 (PWD)

Answer No

c. New Hires to GS-14 (PWD)

Answer Yes

d. New Hires to GS-13 (PWD)

Answer No

We have 9 new hires that identified as being disabled. No person holding a GS-14 position self-identified as being disabled. GS-15 and above are military positions.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB 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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWTB)

Answer Yes

b. New Hires to GS-15 (PWTB)

Answer Yes

c. New Hires to GS-14 (PWTB)

Answer Yes

d. New Hires to GS-13 (PWTB)

Answer Yes

While we have 4 new hires who identified as PWTB, none are from the above positions.

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

i. Qualified Internal Applicants (PWD)

Answer N/A

ii. Internal Selections (PWD)

Answer N/A

b. Managers

i. Qualified Internal Applicants (PWD)

Answer N/A

ii. Internal Selections (PWD)

Answer N/A

c. Supervisors

i. Qualified Internal Applicants (PWD)

Answer N/A

ii. Internal Selections (PWD)

Answer N/A

This data is not collected, However, it is unlikely. Of the 6 Title 5 managers, two identified as being disabled. Of the 10 Title 5 supervisors, two identified as being disabled.

6. Does your agency have a trigger involving PWTB 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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

i. Qualified Internal Applicants (PWTB)

Answer N/A

ii. Internal Selections (PWTB)

Answer N/A

b. Managers

i. Qualified Internal Applicants (PWTB)

Answer N/A

ii. Internal Selections (PWTB)

Answer N/A

c. Supervisors

i. Qualified Internal Applicants (PWTB)

Answer N/A

ii. Internal Selections (PWTB)

Answer N/A

This data is not collected, However, it is unlikely If a Title 5 employee wants to move into a higher paying position, he or she would apply internally. Of the 16 Title 5 managers and supervisors, 4 identified as being disabled.

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for Executives (PWD) Answer N/A
- b. New Hires for Managers (PWD) Answer N/A
- c. New Hires for Supervisors (PWD) Answer N/A

This data is not collected. However, it does not seem likely. If a Title 5 employee wants to move into a higher paying position, he or she would apply internally. Of the 16 Title 5 managers and supervisors, 4 identified as being disabled.

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for Executives (PWTD) Answer N/A
- b. New Hires for Managers (PWTD) Answer N/A
- c. New Hires for Supervisors (PWTD) Answer N/A

This data is not collected. If a Title 5 employee wants to move into a higher paying position, he or she would apply internally. Of the 16 Title 5 managers and supervisors, none identified as having a targeted disability.

Section V: Plan to Improve Retention of Persons with Disabilities

To be 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 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 CFR § 213.3102(u)(6)(i))? If "no", please explain why the agency did not convert all eligible Schedule A employees.

Answer No

During FY 20, there were no Schedule A employees.

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) Answer No
- b. Involuntary Separations (PWD) Answer No

During FY20, there were no employees PWD / PWTD who were voluntarily or involuntarily separated.

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) Answer No
- b. Involuntary Separations (PWTD) Answer No

During FY20, there were no employees PWD / PWTD who were voluntarily or involuntarily separated.

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.

During FY20, there were no employees PWD / PWTD who were voluntarily or involuntarily separated.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 CFR §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.

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://vt.public.ng.mil/Resources/Organizational-Resources/Equal-Employment-Opportunity/>

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://vt.public.ng.mil/Resources/Organizational-Resources/Equal-Employment-Opportunity/>

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.

The SEEM is planning a training when the VTNG's reasonable accommodation policy is approved.

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.)

No requests for accommodations were made in FY 2020.

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.

During FY 20, the VTNG has been timely in starting the process for obtaining the accommodations. We are current when monitoring and following up on needed information to determine the accommodation.

D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

Pursuant to 29 CFR §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.

We had no PAS requests in FY 2020.

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?

Answer No

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?

Answer No

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 complaints filed in FY20..

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?

Answer No

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?

Answer No

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 complaints during FY20.

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 employment opportunities for PWD and/or PWTD?

Answer No

2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?

Answer N/A

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

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

The agency started hiring Title 5 employees within the last few years. The SEEM (EO Director) position is newly occupied. Our SEPM has not been able to attend training. At the time of this report, the RA/PAS policy is being circulated for approval.

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

Through USA Jobs, PWD have applied and been hired for potions within the VTNG.

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.

NA