



**U.S. Department of Justice**  
Federal Bureau of Prisons

## PROGRAM STATEMENT

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# Diversity Management and Affirmative Employment Programs

/s/

*Approved:* Thomas R. Kane  
Acting Director, Federal Bureau of Prisons

## 1. PURPOSE AND SCOPE

The objectives of the Bureau's Diversity Management and Affirmative Employment programs are to adopt best practices to promote diversity and inclusion, and to identify and remove any barriers for achieving equal employment opportunity. The Bureau commits to the goal of achieving a diverse workforce and ensuring inclusion for all. No person shall be subject to retaliation for participating in any of the programs covered by this policy.

The Bureau gives full consideration to the recruitment, hiring, placement, retention, training, and advancement of staff and applicants in accordance with all applicable laws and regulations.

Establishing a model Equal Employment Opportunity (EEO) program at each worksite will provide the infrastructure to achieve the ultimate goal: a discrimination-free work environment, with an atmosphere of inclusion and open competition for employment opportunities.

Six elements necessary for a model EEO program are:

- Demonstrated commitment from agency leadership.
- Integration of EEO into the agency's strategic mission.
- Management and program accountability.

- Proactive prevention of unlawful discrimination.
- Efficiency.
- Responsiveness and legal compliance.

**This policy requires all managers to demonstrate a firm commitment to equality of opportunity for all employees and applicants for employment. Even the best workplace policies and procedures will fail if they are not trusted, respected, and vigorously enforced.**

**a. Summary of Changes**

This revision specifies that AEP Committee's Memorandum of Understanding is signed by the selectee and his/her supervisor; that bi-annual assessments of SEPM's, alternates, and ROPC's occur in March and September; and that Regional Offices and training centers may hold AEP Committee meetings at a minimum of every other month.

*Policy Rescinded*

P3713.29 Diversity Management and Affirmative Employment Programs (12/4/15)

**b. Program Objectives.** Anticipated outcomes of this program are:

- Equal employment, promotion, and training opportunities will be made available to all employees.
- Affirmative Employment Program (AEP) Committees will continue to operate at each facility and will discuss local employment opportunities and diversity topics.
- The elements of a model EEO program will be communicated to employees as a core principle for sound management of a diverse workforce.
- All applicable laws, regulations, and policies concerning Equal Employment, Affirmative Employment, and Diversity Management will be followed.
- Barriers affecting recruitment, hiring, retention, or career development of staff will be identified and eliminated.

**c. Institution Supplement Required.** Implementation of this policy may require development of local Institution Supplements.

**3. ACTION REQUIRED**

Each Chief Executive Officer (CEO) (Regional Director, Assistant Director, Warden, Regional Reentry Manager [RRM], Staff Training Center Director) will ensure compliance with this policy.

**4. AGENCY ACA ACCREDITATION PROVISIONS** (see the Program Statement **Directives Management Manual**, Sections 2.5 and 10.3)

- American Correctional Association 4<sup>th</sup> Edition Standards for Adult Correctional Institutions: 4-4053, 4-4054, and 4-4116.
- American Correctional Association 4<sup>th</sup> Edition Performance Based Standards for Adult Local Detention Facilities: 4-ALDF-7F-04.
- American Correctional Association 2nd Edition Performance Based Standards for Administration of Correctional Agencies: 2-CO-1C-09, 2-CO-1C-09-1, and 2-CO-1G-04.

**REFERENCES**

*Program Statements*

P2000.02	Accounting Management Manual (10/15/86)
P3000.03	Human Resource Management Manual (12/19/07)
P3451.04	Awards Program, Incentive Awards, Bureau of Prisons (7/10/01)
P3713.24	Discrimination and Retaliation Complaints Processing (6/16/14)
P3713.25	Anti-Discrimination (6/16/14)
P3713.26	Anti-Harassment (6/16/14)
P3906.22	Employee Development Manual (4/30/15)

Master Agreement between Federal Bureau of Prisons and Council of Prison Locals (July 21, 2014 – July 20, 2017)

*Other Agencies' Directives, U.S. Code, and Code of Federal Regulations*

- Department of Justice (DOJ) Equal Employment Opportunity Policy
- 5 U.S.C. Sec.552a(b)(1)
- Office of Personnel Management Handbook: Addressing Sexual Orientation Discrimination in the Federal Government
- DOJ 1200.1, Chapter 4-1, Equal Employment Opportunity Program (9/12/03)
- EEOC Management Directive 715, Federal Responsibilities under Section 717 of Title VII and Section 501 of the Rehabilitation Act (10/1/03)
- Title VII of the Civil Rights Act of 1964, as amended (42 U.S.C. § 2000 et seq.)
- The Age Discrimination in Employment Act of 1976, as amended (29 U.S.C. § 621 et seq.)
- Genetic Information Nondiscrimination Act (GINA) of 2008
- The Rehabilitation Act of 1973, as amended (29 U.S.C. § 791 et seq.)
- Americans with Disabilities Act Amendments
- Notification and Federal Employee Antidiscrimination and Retaliation Act of 2002 (No Fear Act), Pub. L. 107-174

- Civil Service Reform Act of 1978
- Executive Order 11478, as amended
- Executive Order 12731, as amended
- Executive Order 13087, as amended
- Executive Order 12067, as amended
- Executive Order 112106, as amended
- Executive Order 13152
- Executive Order 13171
- Executive Order 13125
- Executive Order 13270
- Executive Order 13548
- Executive Order 13583
- Title 5 CFR Part 720
- Title 28 CFR Part 39
- Title 28 CFR Part 42, Subpart A
- Title 29 CFR Part 33
- Title 29 CFR Parts, 1601, 1604, 1608, 1613, and 1614
- DOJ Manual and Procedures for Providing Reasonable Accommodations

#### *Records Retention Requirements*

Requirements and retention guidance for records and information applicable to this program are available in the Records and Information Disposition Schedule (RIDS) on Sallyport.

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## **Chapter 1. DELEGATION OF PROGRAM AUTHORITY AND RESPONSIBILITIES**

This section outlines responsibilities for implementing Diversity Management and Affirmative Employment programs at all organizational levels.

**1. Director's Responsibilities.** The Director enforces the Diversity Management and Affirmative Employment programs to ensure that all employees and applicants are treated fairly and equitably. The Director communicates to staff their responsibility under Federal statutes to contribute to a work environment that:

- Is free of discriminatory practices and procedures.
- Is inclusive and fair.
- Embraces the uniqueness of others.
- Values each employee.

In compliance with MD 715 and 29 CFR 1614.102, the Director shall designate an EEO Director who reports directly to him/her. The EEO Officer will report to the EEO Director and must not be located in the Office of General Counsel or the Human Resource Management Division.

In compliance with MD 715, the Director must issue a written policy statement expressing his/her commitment to equal employment opportunity (EEO) and a workplace free of discriminatory harassment. This statement should be issued at the beginning of his/her tenure and thereafter on an annual basis and disseminated to all employees. New supervisors will receive a copy of such statement during initial supervisory training.

The Director delegates to each Regional Director, Assistant Director, and CEO the responsibility for implementing Diversity Management and Affirmative Employment programs for regional offices, training centers, institutions, Federal Correctional Complexes (FCC), the Grand Prairie Office Complex, and the Central Office, to include:

- Ensuring compliance with Federal statutes governing Affirmative Employment under Title VII of the Civil Rights Act and Section 501 of the Rehabilitation Act.
- Demonstrating a commitment to equal opportunity that is consistently communicated through the ranks.
- Developing a system to evaluate program effectiveness and identify and eliminate barriers.
- Ensuring appropriate practices are identified to improve the effectiveness of agency efforts to recruit, hire, promote, retain, develop, and train a diverse and inclusive workforce, consistent with merit system principles and applicable laws.

- Ensuring accuracy of data and timely submission of reports.

2. **Regional and Assistant Directors.** Assistant and Regional Directors delegate to their CEOs, branch chiefs, and administrators the responsibility to ensure that resources are provided to implement Diversity Management and Affirmative Employment initiatives to enhance recruitment, hiring, retention, career development, and advancement opportunities. Regional and divisional recruitment programs, formal and informal, include outreach initiatives that enhance employment opportunities for all staff.

Each Regional Director selects and directly, or through his/her Deputy, supervises a Regional Affirmative Employment Administrator, per MD-715 and 29 C.F.R. 1614.102.

The Regional Director ensures that resources are available to the Regional Affirmative Employment Administrator, who keeps the Regional Director and the EEO Officer informed of barriers or program concerns.

Each Assistant and Regional Director ensures the incorporation of Equal Employment Opportunity principles in his/her policies, procedures, and training initiatives as a core principle of personnel management.

In compliance with MD 715, each Assistant and Regional Director must issue a written policy statement expressing his/her commitment to equal employment opportunity (EEO) and a workplace free of discriminatory harassment. This statement should be issued at the beginning of his/her tenure but no later than 30 days thereafter. The statement must be reissued on an annual basis and disseminated to all employees within the respective divisions or regions.

3. **Chief Executive Officers (CEO)** (for the purpose of this section, CEO does not include the Director, Assistant Directors, or Regional Directors). Each CEO ensures that resources are allocated to administer the Diversity Management and Affirmative Employment programs effectively. The CEO:

- Issues an initial **“Statement of Commitment”** upon arrival but no later than 30 days thereafter, to communicate to staff his/her commitment to equal employment opportunity (EEO) and a workplace free of discriminatory harassment. The statement is reissued annually to all staff and posted where it is visible and accessible. The **“Statement”**:
  - Confirms managerial responsibility to recruit, hire, and promote qualified individuals in all job categories without regard to race, color, religion, sex, age, national origin, disability status, gender identity, parental status, or sexual orientation.



- Confirms managerial commitment to create a work environment where:
  - Equitable training and career development opportunities are available.
  - Each employee is valued.
  - Each employee is expected to make a contribution to the Bureau's mission.
  - No employee is subject to retaliation as a result of participation or non-participation in any Affirmative Employment program.
- Confirms the Bureau's commitment to the vision of achieving a diverse workforce at all levels.
- Discusses with managers and supervisors the need to establish an effective avenue to address employment barriers and staff concerns, especially:
  - Recruiting, hiring, developing, and retaining supervisors and managers with effective communication and interpersonal skills.
  - Providing managers and supervisors with training and resources to understand their responsibilities, including EEO policies, reasonable accommodation procedures, and Alternative Dispute Resolution.
  - Providing new managers and supervisors a copy of the **"Statement of Commitment."**
- Involves managers and supervisors in program initiatives that support the Bureau's Diversity Management and Affirmative Employment programs.
- Ensures that a self-assessment is conducted at least annually, to assess the program's effectiveness and ascertain whether a good faith effort has been made to identify and remove barriers to equality in the workplace.
- Evaluates managers and supervisors on their efforts to ensure equality of opportunity.
- Appoints an Affirmative Employment Chairperson who reports directly to him/her.
- Ensures that the Affirmative Employment Chairperson serves on advisory boards and committees essential to the facility's operation (policy review committee, local workgroups, etc.). If the topics discussed concern negotiable conditions of employment, the Union is entitled to be present and represent bargaining unit staff.
- Establishes a **standard or electronic** Affirmative Employment bulletin board. Standard bulletin boards should be in a prominent place accessible to all staff (e.g., the front entrance, the employee lounge). Electronic bulletin boards may include monitor displays, intranet pages, or other media displays.
- Selects a local, collateral duty, Diversity Management Instructor. A FCC will have *one primary instructor and at least two alternates*.

**4. Human Resource (HR) Managers.** Human Resource Managers are responsible to recruit from a diverse, qualified group of potential applicants to secure a high-performing workforce drawn from all segments of society.

Human Resource Managers provide data to keep the CEO and Affirmative Employment Committee informed about employment trends that affect recruitment, hiring, advancement, and retention, including:

- Maintaining a data system that collects accurate information on race, national origin, sex, and disability status.
- Engaging in outreach and recruitment efforts to obtain a diverse applicant pool.
- Maintaining a tracking system to permit analysis of recruitment activities and examination of potential barriers to equal opportunity.
- Supporting the Departmental goals for hiring individuals with disabilities.
- Collecting and discussing with the Committee, at least quarterly during scheduled meetings, local employment statistics (new hires, separation rates, projected vacancies, incentive awards, promotions, disciplinary actions, etc.).
- Maintaining data tracking the number and types of reasonable accommodation requests received and the number denied, approved, and pending approval.

**5. Managers and Supervisors.** To ensure the success of the Diversity Management and Affirmative Employment programs, managers and supervisors:

- Ensure Committee members from their department have time to perform collateral-duty Affirmative Employment responsibilities; this will be up to 20 percent of their duty time, but may be adjusted for special projects, based on the needs of the Affirmative Employment Committee.
- Ensure their staff are permitted to attend Diversity and Affirmative Employment programs.
- Foster a work environment that provides equitable training and career development opportunities.
- Create an inclusive work environment that embraces the uniqueness of others and where each employee is valued.
- Ensure an avenue is available to identify and address staff concerns (e.g., be accessible to staff) within their department.
- Inform staff of the expectation that employees under their supervision will promote fair and equitable treatment.

- Support Affirmative Employment initiatives identified in the local Management Directive (MD) 715, Federal Equal Opportunity Recruitment Program (FEORP) Plan, and Disabled Veterans Affirmative Action Program (DVAAP) Plan.

## **Chapter 2. ADMINISTERING THE AGENCY'S PROGRAM**

**1. Affirmative Employment Programs Office (AEPO).** Per the MD-715 and 29 C.F.R. 1614.102 under the direction of the Chief, Office of Conflict Resolution, Equal Employment, and Diversity (CREED), the AEPO is responsible for the effectiveness and efficiency of the agency's Affirmative Employment Program (AEP). The AEPO:

- Ensures that adequate resources are available to administer the AEP.
- Develops and implements policies governing the AEP.
- Analyzes workforce data (applicant flow, disciplinary actions, promotions, awards, accessions, and separations), to keep abreast of accomplishments and employment trends that affect employment, advancement, and retention.
- Monitors and evaluates the AEP to keep abreast of strengths and weaknesses and recommend corrective action(s).
- Conducts barrier analyses in accordance with MD-715.
- Reviews reports submitted by the institutions and regions to monitor national accomplishments, employment barriers, staff concerns and issues, and recruitment initiatives.
- Advises management on employment trends.
- Periodically conducts staff assistance visits at regional offices.
- Develops and submits the agency's FEORP and Disabled Veterans reports for inclusion in the DOJ submissions.
- Maintains contact with national organizations representing various diverse groups.
- Submits the agency's MD-715 to EEOC for review.
- Ensures proper training of all Affirmative Employment staff, both full time and collateral duty.
- Provides advice and direction to Regional Affirmative Employment Administrators, AEP Committee Chairpersons, and SEPMs, as requested.
- Coordinates national training meetings for SEPMs when approved.
- Oversees the development of Affirmative Employment Program Review Guidelines.
- Develops the Bureau's strategic plan objectives for Affirmative Employment.

**2. Diversity Management Program.** Under the direction of the Chief, Office of CREED, Diversity Management initiatives are implemented by the Diversity Management Administrator. The CEO must assume a leadership role in recruiting and selecting employees from all segments of society. Human Resource offices must provide critical support for these efforts.

The primary objectives of Diversity Management are to:

- Maintain a diverse workforce that works together and is able to effectively communicate.

- Through training initiatives, provide staff a greater understanding of the value of diversity and inclusion.

The **Diversity Management Administrator** oversees the Bureau-wide implementation of Diversity Management initiatives. The Administrator:

- Directs, monitors, and evaluates the Bureau's Diversity Management Program.
- Provides direction and guidance to senior leadership on the Bureau's Diversity Management Program.
- Provides advice and direction on diversity issues to local Diversity Management Instructors.
- Monitors training needs and provides training and guidance to local Diversity Management Instructors.
- Helps develop diversity curricula for new employee training, Annual Training (AT), and other training programs.
- Coordinates and conducts training for Central Office staff, Diversity Management Instructors, and at national and regional training meetings.
- Oversees the development of the Bureau's Diversity Management Program Review Guidelines.
- Assists in the development of the Bureau's strategic plan objective as it relates to diversity.
- Works with the Bureau's National Recruiter to ensure diversity initiatives are implemented when recruiting.

3. **Regional Affirmative Employment Program (AEP) Administrator.** The Regional AEP Administrator administers the region's AEP and provides guidance and technical assistance to the AEP Committee at the regional office and institutions. The Administrator:

- Ensures that resources are appropriately used to administer the region's AEP.
- Reviews, monitors, and analyzes institution reports (e.g., MD-715, FEORP, DVAAP, After Action Reports, Chairperson's Mid-Year Accomplishment Reports, Affirmative Employment committee meeting minutes) to evaluate the effectiveness of the local programs.
- Assesses each special emphasis program area at each institution within his/her region to monitor type and purpose of activities, staff issues, recommendations and suggestions, etc., and forward pertinent information to the AEPO.
- Analyzes workforce data (applicant flow, disciplinary actions, promotions, awards, accessions, and separations) to keep abreast of trends within the region.
- Keeps the Regional Director advised of employment trends, program accomplishments, concerns, strengths, and weaknesses.
- Develops and submits the region's MD-715 and DVAAP for inclusion in the Bureau's reports.
- Ensures that strategies are implemented region-wide in support of Bureau initiatives.

- Monitors and evaluates operational and program review findings and recommends corrective action(s), as needed.
- Develops a mid-year report of regional accomplishments to be submitted to the AEPO by May 30 each fiscal year. Reports include:
  - Accomplishments that support institution, region, and agency MD-715, FEORP, DVAAP, and recruitment initiatives.
  - Progress in eliminating regional barriers to employment, advancement, and retention of staff.
  - Staff concerns that affect the national program and recommendations for addressing them.
- Maintains contact with national organizations representing various ethnic groups and women.
- Conducts staff assistance visits to institutions within the region to train new Affirmative Employment Program Committee members and provide technical assistance.
- Maintains at least quarterly contact (teleconferences, e-mail, etc.) with institution and regional AEP Chairpersons to provide advice, technical assistance, policy changes, and program initiatives.
- Monitors local recruitment initiatives to eliminate duplication and ensure that activities support regional and national recruitment (FEORP, DVAAP, and MD-715 objectives).

4. **Local Affirmative Employment Program (AEP).** Each CEO maintains an active AEP Program, including establishing an AEP Committee. At the Regional Director's discretion, and with the approval of the EEO Director, an FCC may establish a consolidated AEP (see Chapter 6).

In accordance with Article 10 of the Master Agreement, the Union has the right to serve as a member of the AEP Committee. This includes the right to have their concerns voiced at the meeting, without change, and forwarded to the CEO. This could include an in-person meeting, if requested by either party.

The Union will have membership on the AEP Committee in accordance with Articles 10 and 22 of the Master Agreement.

5. **Local Diversity Management.** Local Diversity Management instructors are Bureau-trained to conduct Diversity Management Training. Each facility (including the Central Office, Grand Prairie Office Complex, training centers, and regional offices) will have a primary and alternate Diversity Management Instructor who conducts Diversity Management sessions during AT, New Employee Orientation, and locally developed training. An FCC has one primary instructor and at least two alternates. Selections to these positions are at the discretion of the CEO. At a minimum, instructors must have good instructional abilities, good communication and

interpersonal skills, credibility, and sound knowledge and experience relating to diversity management. Upon completion of Diversity Management Training, Diversity instructors serve a minimum of two years unless removed by the CEO earlier. These instructors participate, if available, in the AEP meetings in accordance with chapter 4.

**6. Establishing the AEP Committee.** At a minimum, the AEP Committee consists of a chairperson, a Recruitment and Outreach Program Coordinator (ROPC), and six SEPMs. Each CEO appoints a collateral-duty Chairperson to oversee the Committee. Except as otherwise approved by the Regional Director and the Assistant Director, PRD, these duties are assigned to a full-time employee at GS-13 or above.

In accordance with Article 10 of the Master Agreement, the Union President, or his/her designee, has a right to serve as a member of the Affirmative Employment Committee. At FCCs, the Union President may appoint a Union representative from each facility to the Affirmative Employment Committee. The duties of the Union representatives on the committee will be in accordance with Articles 10 and 22 of the Master Agreement. The Chairperson will include the Union representative's concerns that were voiced at the meeting, without change, and forward them to the Warden or CEO.

In addition to the Chairperson, the CEO selects the following AEP Committee members:

- Recruitment and Outreach Program Coordinator.
- Asian/Native Hawaiian/Pacific Islander Program Manager.
- American Indian/Alaskan Native Program Manager. (The CEO may divide these responsibilities into two SEPMs based on the institution needs.)
- Black Affairs Program Manager.
- Disability Employment Program Manager.
- Federal Women's Program Manager.
- Hispanic Employment Program Manager.
- Lesbian, Gay, Bisexual, Transgender Program Manager.

The CEO may add additional programs for which vacancy announcements must be created. Staff may only be selected to serve in one of the positions listed above at a time.

Committee positions are collateral-duty assignments. The CEO may select alternate program managers. If alternates are selected, a Memorandum of Understanding (MOU) must be issued. All members are expected to spend up to 20 percent of on-duty time on their collateral responsibilities. However, based on the needs of the AEP Committee, this time may be adjusted to complete special projects. Applicants must have a minimum of one year with the Bureau.

### Chapter 3. AEP COMMITTEE RESPONSIBILITIES

This chapter outlines duties and responsibilities of the AEP Committee for implementing and monitoring the local program.

1. **Chairperson.** The Chairperson provides leadership and oversees the collateral duties of each SEPM, ROPC, and other members assigned to the Committee. The Chairperson:

- Ensures that, in the event of a SEPM or ROPC vacancy, the Committee assumes the position's responsibilities temporarily. Vacant positions will be advertised within 30 calendar days of the vacancy. If no employees apply, these positions will continue to be readvertised until they are filled. The announcement emphasizes that the position is collateral-duty and has no known promotion potential. However, the position will provide the applicant with the opportunity to increase skills such as problem-solving, listening, and conflict resolution. Experience can be credited when applying for other positions.
- Ensures that the Memorandum of Understanding (MOU) is signed within 15 calendar days of selection of a SEPM, an alternate SEPM, or a ROPC. The MOU, which is kept at the local level, is signed by the CEO, the selectee, and the selectee's supervisor.
- Ensures that within 15 calendar days of the selection of a SEPM, an alternate SEPM, or ROPC, an addendum describing collateral-duty responsibilities is attached to his/her position description.
- Ensures that the committee periodically conducts cultural programs representative of the Bureau's diversity. Programs should focus on enhancing staff awareness and understanding of various cultures and building unified teams. Cultural programs may be combined to demonstrate solidarity.
- Ensures each SEPM, alternate SEPM, and ROPC has completed required training (see Chapter 8).
- Ensures local recruitment programs implemented by the facility target areas to increase the availability of applicants who are from groups that are determined to be in the applicant pool at a rate lower than their expected rate, based on the most recent Civilian Labor Force statistical data for Occupational Groups (from the U.S. Bureau of the Census). The Bureau's recruitment policies should endeavor to achieve a work force from all segments of society, while avoiding discriminatory hiring practices for or against any employee or applicant.
- At least bi-annually (March and September), provides a written assessment of each SEPM's, alternate SEPM's, and ROPC's performance and training recommendations to the supervisor. This is discussed with the employee before providing it to the supervisor. The assessment is considered by the supervisor in the annual training needs assessment and performance evaluation.



- Periodically reviews the Affirmative Employment program to include the role of the SEPMs and alternates to determine if changes should be made.

2. **Special Emphasis Program Manager (SEPM) Responsibilities.** (See Chapter 1, Section 5, Manager's and Supervisor's Responsibilities, regarding duty time.) Committee members support the facility's program by taking an active role in AEP activities. The SEPM:

- Must be actively involved in AEP initiatives including attending meetings (see Chapter 4). Maintain contact with constituency group members to share program information and identify group concerns or issues. This contact is on duty time. SEPMs are not required to maintain minutes of formal contact with constituents; however, informal documentation regarding program information (flyers, e-mails, etc.) should be maintained for review through the completion of the current Program Review cycle.
- Coordinate program planning meetings for AEP Committee activities to solicit recommendations and assistance from staff.
- Keep the AEP Committee Chairperson abreast of constituency group concerns and issues.
- With the committee's assistance, sponsor commemorative month and continuing educational programs throughout the year.
- Participate in developing the FEORP, DVAAP, and MD-715 reports by:
  - Identifying barriers to employment that have an adverse impact on their constituency group.
  - Recommending strategies to overcome barriers.
  - Recommending targeted recruitment initiatives, including providing job information and making presentations to community organizations, etc.
  - Attending job and career fairs.
- Establish and maintain contact with local community organizations and resources to help AEP initiatives (provide guest speakers, eliminate employment barriers, recruit a diverse applicant pool, enhance staff retention, solve community-based issues, etc.) These contacts will be on duty time.

3. **Alternate SEPMs.** The role of the Alternate SEPM is to assist the SEPM in carrying out his/her responsibilities.

4. **Recruitment and Outreach Program Coordinators (ROPCs).** The ROPC's primary role is to assist the Human Resource Department with the local recruitment program, including the recruitment of volunteers, by identifying and implementing outreach efforts to enhance the diversity of the applicant pool. The ROPC must:

- Take an active role in all AEP activities, including helping with AEP Committee functions and attending meetings.
- Work with department heads to discuss recruitment needs and identify outreach initiatives for recruiting a qualified, diverse workforce.
- Monitor implementation of the FEORP Plan and supporting initiatives (assess recruitment efforts, recommend changes to the plan, develop new recruitment initiatives, etc.).
- Report on local recruitment using the Local Recruitment After Action Report (see Chapter 5).

## **Chapter 4. LOCAL PROGRAM ADMINISTRATION**

**1. Committee Meetings.** The AEP Chairperson schedules, convenes, and conducts AEP meetings. One of the purposes of the meeting is to advise management on the status of the AEP and to serve as a sounding board for determining attitudes of and toward staff at the facility. Meetings must be held monthly. (The CEO and Union President may agree to add additional meetings.) In limited circumstances, the CEO and Union President may agree to skip one month. If a meeting is not held, the Chairperson must document the reasons why. Regional Offices and training centers may hold their meetings at a minimum of every other month. Committee meetings are structured to:

- Allow each SEPM and ROPC to report on his/her program activities and express staff concerns. Collateral-duty members are only required to attend during duty time. When a collateral-duty member is absent, the SEPM, alternate, or ROPC either provides a written report on activities in his/her area to the Chairperson or has a representative give an oral report.
- Allow the Union representative to address Union concerns, including staff issues.
- Ensure that, at least quarterly, personnel employment data (accessions, separations, performance awards, promotions, etc.) are discussed.
- Ensure meeting minutes document attendance and progress toward initiatives in the FEORP, DVAAP, and MD-715 Reports. Minutes are routed via e-mail to the CEO, the Union, and the Regional AEP Administrator, and posted where they are accessible to all staff. A copy is kept in the Committee's master file.
- The members of the AEP committee will meet prior to discuss the business of the committee, ongoing programs, and any concerns raised by their constituents.
- Monthly AEP meetings should be convened at a location that will allow the attendance of all staff. During the monthly meetings, the committee will share information about upcoming programs, progress of annual reports, recruitment events, training, and other business the committee discussed. In addition, staff will be permitted to provide input or feedback.
- AEP monthly meetings must not be held in conjunction with the Department Head meetings.
- At least on a quarterly basis, the CEO, a representative from the HR staff and the Diversity Instructor will attend the meeting to discuss diversity and inclusion-related topics, including recruitment, retention, and employee engagement.

EEO Counselors are under the supervision of the EEO Officer, Program Review Division, Central Office. EEO Counselors are encouraged to attend AEP committee meetings at their assigned facilities when possible.

2. **AEP Budget.** Each Committee member is to have input in the development of the local AEP budget. The Committee must submit an estimated budget for the fiscal year based on the assessment of future issues that may impact the program, the previous year's expenditures, and new initiatives the Committee proposes. If necessary, the budget is adjusted when the final allocations are distributed at the beginning of the fiscal year.

The Committee's budget is managed in the designated AEP Cost Center for each training center, institution, regional office, and the Central Office. The cost center manager keeps a file of all AEP expenditures, including Financial Management Information System (FMIS) data, in accordance with the Bureau's Records and Information Disposition Schedule (RIDS).

The Regional Office Cost Center will be managed by the Regional AEP Administrator.

3. **AEP Bulletin Board.** Each CEO establishes a standard or electronic AEP bulletin board. Standard bulletin boards are located in a prominent place accessible to all staff (front entrance, employee lounge, etc.). Electronic boards may include monitor displays, intranet pages, or other media displays.

The Chairperson ensures that required items are posted: an updated CEO "Statement of Commitment" and a photo of each Committee member with name, collateral-duty title, and office telephone. The Union may also choose to post a photo of its representative. This applies to all Bureau facilities, including Residential Reentry Management offices.

For contract facilities where there is a limited number of contract oversight staff, contact information is given to staff in writing.

## Chapter 5. REPORT SUBMISSIONS

1. **General Requirements.** Annually, Bureau facilities are required to submit the reports in this chapter by the dates specified. The Regional AEP Administrator oversees the submission of AEP reports for his/her region. The Central Office AEP Chairperson oversees submissions for the training centers and the Grand Prairie Office Complex.

Each Chairperson oversees the development and submission of all documents to the CEO. CEOs sign the report cover sheet certifying review and concurrence prior to submission. Chairpersons ensure that:

- Plans support established AEP initiatives and comply with policy and the instructions provided by the AEPO.
- Reports and plans are implemented and corrective measures taken to address employment barriers.
- Managers provide input into reports that affect their departments.

Upon approval of annual report submissions, a copy is provided to the local Union, and, upon request, to any Council of Prison Locals Executive Board member.

The Regional AEP Administrator and the AEPO, Central Office, monitor submitted reports.

2. **Chairperson's Mid-Year Accomplishment Report.** Each AEP Committee Chairperson submits a Mid-Year Accomplishment Report to the Regional AEP Administrator by April 30 each fiscal year. The report is compiled based on meeting minutes and input from Committee members. Additional information may be requested to support other regional or Central Office reporting requirements. Reports include:

- Accomplishments that support institution, region, and agency MD-715, FEORP, DVAAP, and recruitment initiatives.
- Progress in eliminating regional barriers to employment, advancement, and retention of staff.
- Staff issues and concerns, with suggested corrective action (if applicable).
- Community networking and outreach activities that enhanced staff retention, race relations, relations with minority/women organizations, and the recruitment program. Type of informal contacts made in support of Affirmative Employment recruitment efforts (follow-ups with applicants, individual contacts made at social functions, community activities, club meetings, etc.) and other employment activities the SEPM sponsored that focused on targeted groups, which were not reported on a local Recruitment After Action Report.

3. **Recruitment After-Action Reports.** A Recruitment After-Action Report is completed for each external recruitment effort conducted. A copy is submitted to the Regional AEP Administrator and the Central Office Affirmative Employment Programs Office within 10 working days after the event. Each report includes:

- Type of recruitment activity.
- Date of event.
- Location.
- Target group(s).
- Target position(s).
- Funding information.
- Efforts in support of Persons with Disabilities, Historically Black Colleges and Universities (HBCUs), Hispanic Serving Institutions (HSIs), Tribally Controlled Colleges and Universities (TCCUs), or an Asian American/Pacific Institutions (AAPI).

4. **EEOC's Management Directive (MD)-715 Report.** Each field component submits a MD-715. Local submissions are sent to the Regional AEP Administrator or AEPO, Central Office, by November 30 each fiscal year. The following guidelines apply:

- FCCs submit a consolidated report.
- The Grand Prairie Office Complex and training centers submit Forms A-F and Form I accomplishments to the Central Office AEP Chairperson for incorporation in the Central Office report.
- Report submissions are based on requirements outlined in MD-715 and instructions provided by the AEPO.
- Upon approval of the report, an approval letter is sent to each location that provided a report.
- Reports that do not fully meet requirements are returned to the submitting office for revision.
- Regional AEP Administrators develop the regional MD-715 submission.
- Regional reports are developed based on the information from local AEP MD-715 submissions and sent to the Central Office by December 31 each fiscal year.

5. **Disabled Veterans Affirmative Action Program (DVAAP) Accomplishment Report.**

The Regional AEP Administrator will develop a DVAAP plan that identifies strategies to be implemented in support of the Disabled Veterans Program. Upon approval, the Regional AEP Administrators will disseminate a copy of the plan to each facility for implementation. Based on the strategies identified in the plan, The CEO ensures that a DVAAP Accomplishment Report is submitted to his/her Regional AEP Administrator by October 10 each fiscal year. The Grand Prairie Office Complex and training centers submit their report to the Central Office AEP

Chairperson. The Regional Administrator notifies each institution directly of any need for additional information.

The DVAAP Accomplishment Report includes:

- Methods used to recruit disabled veterans, including veterans who are 30% or more disabled.
- Methods used to improve internal advancement opportunities.
- Methods used to communicate objectives to staff.
- Procedures used to monitor progress.

The Regional AEP Administrator will review and develop a regional accomplishment report based on field submissions. The Regional Administrator notifies each institution directly of any need for additional information. Regional reports are sent to the AEPO, by October 30 each fiscal year.

**6. Federal Equal Opportunity Recruitment Program (FEORP) Plan.** Each institution develops a local FEORP plan, submitted to the Regional Affirmative Employment Administrator, by November 1 each year. The Grand Prairie Office Complex and training centers submit to the Central Office AEP Chairperson for consolidation into a Central Office plan. The Regional AEP Administrator develops a regional FEORP plan based on field submissions and monitors implementation of the institution's plan. Regional plans are sent to the AEPO, by December 1st each year.

Each report includes:

- Target group(s).
- Target position(s).
- Recruitment activity (external and internal).
- Location.
- Target date(s).

The Plan includes strategies targeted to specific groups and is based on a statistical analysis of each facility's workforce. Supporting statistical data are attached to the FEORP plan and kept as part of the file.

The FEORP Plan should contain internal and external recruitment strategies geared toward enhancing employment opportunities for underutilized groups.

## **Chapter 6. ESTABLISHING AN AEP AT FCCs**

This chapter provides guidance for establishing a consolidated AEP at Federal Correctional Complexes (FCC). The Complex Warden ensures that AEP responsibilities are implemented at all institutions within the complex.

The FCC AEP Committee has a chairperson and one SEPM per program, per complex. In consultation with the Union, the Complex Warden will determine how many additional alternate SEPMs should be selected for each additional institution within a Complex. In addition to the responsibilities outlined in Chapters 4 and 5, the following requirements apply to consolidated Committees.

- The Chairperson's duties are assigned by the Complex Warden.
- The Chairperson reports to the Complex Warden on AEP activities, barriers, strategies to overcome employment and advancement barriers, staff concerns, and accomplishments.
- The Chairperson manages the consolidated AEP designated cost center.
- A "Statement of Commitment" covering the complex is signed annually by the Complex Warden, and accessible to all staff.
- Each FCC facility maintains an AEP bulletin board.
- Meetings are held at a central site (e.g., staff training center) or on a rotating basis at each institution.



## **Chapter 7. ESTABLISHING PROGRAMS AT NEW FACILITIES**

At new facilities, the site activation committee ensures that Affirmative Employment and Diversity Management community outreach and recruitment initiatives are included in activation planning.

The regional office develops an activation plan that includes a community outreach program to increase the diversity of the applicant pool. Community outreach initiatives include:

- Contacting community organizations and publications representing special emphasis groups.
- Expanding the area of contact when necessary.
- Implementing outreach efforts to increase the community's understanding of diversity (if applicable).
- Contacting trade unions, colleges and universities, and trade/vocational schools with a high special emphasis group complement.

The CEO at a new facility ensures that an AEP Committee is established at least three months before the official activation date. When the Committee is established, the Chairperson ensures that annual plans (FEORP, DVAAP, MD-715 reports) are submitted for approval (see Chapter 5) at the beginning of the fiscal year following activation.

If a Union representative is not appointed before the Committee's establishment, the CEO contacts the Council of Prisons Locals' Regional Vice President and asks that Union representatives be appointed to the Committee until a local is established.

Meetings are held with as much advance notice to the Union as possible, to allow arrangements to be made for them to attend.

## Chapter 8. TRAINING REQUIREMENTS

Staff who were AEP Committee members at a previous institution are exempt from the initial training requirement if they completed initial training while serving as chairperson, primary program manager, or recruiter (and this is documented on the training record).

1. **Chairpersons and Special Emphasis Program Managers.** Within six months of assignment as AEP Committee members, the Chairperson and SEPMs must complete the training outlined on the Affirmative Employment Sallyport page at <http://sallyport.bop.gov/co/prd/aa/index.jsp>. At the Chairperson's discretion, members may receive additional training (public speaking, time management, etc.).
2. **Recruitment and Outreach Program Coordinators.** Within six months of selection, ROPCs must complete the training listed on the Affirmative Employment Sallyport page at <http://sallyport.bop.gov/co/prd/aa/index.jsp> and on-the-job-training in recruitment and employment procedures (staffing procedures, application process, handling difficult recruitment situations, availability of recruitment materials, position qualifications, etc.).
3. **Institution Diversity Instructors.** Diversity Management Instructors are certified through the NCA Diversity Management Training-for-Trainers Program before assuming responsibilities for local training.
4. **New Employees.** New employees are provided training on the purpose and objectives of the AEP during New Employee Orientation. The AEP Chairperson or his/her designee may present the AEP lesson plan.
5. **Union Representatives.** The agency recognizes the National Fair Practices role to train its representatives in accordance with the Master Agreement in diversity and affirmative action on duty.