EEOC FORM 715-02 PART A - D		U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT										
	USDA	Risk I	Managemer	nt Agency		For period covering October 1, 2018 to September 30, 2019						
PART A Department or Agency	1.	Agenc	y		1. USD.	A Risk Management Age	ency					
Identifying Information	1.a	2nd lev	vel reporting	component								
	2.	Addres	ss		2. 1400	2. 1400 Independence Ave, SW, Stop 0801						
3. City, State, Zip Code				3. Wash	3. Washington, DC 20250							
	4.	Agency	Code	5. FIPS code(s)	4. AG0	3	5.					
PART B Total Employment	1.	Enter to	otal number	of permanent full-time	and part-time emp	part-time employees 1. 352						
	2 .	Enter to	otal number	of temporary employee	s	2.			7			
	3.	тота	L EMPLO	YMENT [add lines B 1	through 2]			4. 35	9			
PART	C			Title Type		Name			Title			
Agency Official(s)) Respor	nsible	Head of A	gency		Matin Barbre			Administrator			
For Oversight Progran	t of EEC)	Head of A	gency		Martin Barbre			Administrator, Risk Management Agency			
			Head of A	gency Designee		Keith Gray	Keith Gray		Chief of Staff, Risk Management Agency			
Head of Agency Designee				Sonny Purdue	Sonny Purdue		Secretary of Agriculture					
Principal EEO Director/Of			EO Director/Official		Emily Su	Emily Su		Director				
Principal EEO Director/Official			Dena Davis			Acting Director, Office of Civil Rights						
			Affirmativ	e Employment Program	Manager	Tiffany Wallace			Branch Chief			
			Affirmativ	e Employment Program	Manager	Dena Davis			Acting Director, Office of Civil Rights			
			Complaint Processing Program Manager			Sandra MaWhistor			Acting Propol Chief			

Head of Agency	Matin Barbre	Administrator
Head of Agency	Martin Barbre	Administrator, Risk Management Agency
Head of Agency Designee	Keith Gray	Chief of Staff, Risk Management Agency
Head of Agency Designee	Sonny Purdue	Secretary of Agriculture
Principal EEO Director/Official	Emily Su	Director
Principal EEO Director/Official	Dena Davis	Acting Director, Office of Civil Rights
Affirmative Employment Program Manager	Tiffany Wallace	Branch Chief
Affirmative Employment Program Manager	Dena Davis	Acting Director, Office of Civil Rights
Complaint Processing Program Manager	Sandra McWhirter	Acting Branch Chief
Complaint Processing Program Manager	Janel Butler	EEO Program Assistant
Diversity & Inclusion Officer	Sherry Dixon	Director
Diversity & Inclusion Officer	Michael Alston	Associate Administrator
Hispanic Program Manager (SEPM)	Rick Tafoya	NHEPM
Hispanic Program Manager (SEPM)	Ron Brown	SEPM Manager
Women's Program Manager (SEPM)	Iris Snowden	SEPM Manager
Women's Program Manager (SEPM)	Katherine Pruss	NWPM
Disability Program Manager (SEPM)	Iris Snowden	SEPM Manager
Disability Program Manager (SEPM)	Michelle Jordan	NDEPM
Disability Program Manager (SEPM)	Demitrice Boozer	NDEPM
Special Placement Program Coordinator (Individuals with Disabilities)	Demitrice Boozer	NDEPM
Special Placement Program Coordinator (Individuals with Disabilities)	Marvin Jones	RA Program Manager
Special Placement Program Coordinator (Individuals with Disabilities)	Michelle Jordan	NDEPM
Reasonable Accommodation Program Manager	Colette Ross	Reasonable Accommodation Coordinator
Reasonable Accommodation Program Manager	Marvin Jones	RA Program Manager

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U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

USDA Risk Management Agency

For period covering October 1, 2018 to September 30, 2019

Title Type	Name	Title
Anti-Harassment Program Manager	Emily Su	Director
Anti-Harassment Program Manager	Dena Davis	Acting Director, Office of Civil Rights
Anti-Harassment Program Manager	Noreen Joice	Chief
ADR Program Manager	Darlene Thompson	ADR Program Manager
ADR Program Manager	Shari Welker	ADR Program Manager
Compliance Manager	Shari Welker	ADR Program Manager
Compliance Manager	Brian Garner	Branch Chief
Principal MD-715 Preparer	Alex Christensen	Management Analyst
Principal MD-715 Preparer	Alex Christensen	Management Analyst

FEOC FORM 715-02 PART A - D

U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

			For period covering October 1, 2018 to September 30, 2019			
PART D List of Subordinate Components Covered in This Report			Component and Location (City/State)	Country	Agency Code	
			k Management Agency Spokane, WA	United States	AG08	
			k Management Agency pringfield, IL	United States	AG08	
		USDA Risi	k Management Agency Topeka, KS	United States	AG08	
		USDA Risi	k Management Agency Valdosta, GA	United States	AG08	
			k Management Agency nsas City, MO	United States	AG08	
		USDA Risl	k Management Agency dianapolis, IN	United States	AG08	
		USDA Risl	k Management Agency Eagan, MN	United States	AG08	
		USDA Risi	k Management Agency Dallas, TX	United States	AG08	
			k Management Agency Davis, CA	United States	AG08	
			k Management Agency Raleigh, NC	United States	AG08	
		USDA Risl	k Management Agency nsas City, MO	United States	AG08	
			k Management Agency Davis, CA	United States	AG08	
			k Management Agency Billings, MT	United States	AG08	
		USDA Risi	k Management Agency fackson , MS	United States	AG08	
		USDA Risl	k Management Agency ahoma City, OK	United States	AG08	
		USDA Risl	k Management Agency Raleigh, NC	United States	AG08	
		USDA Risl	k Management Agency St. Paul, MN	United States	AG08	
EEOC FORMS and Documents	Required	Uploaded				
Anti-Harassment Policy and Procedures	Υ	Υ				
Agency Strategic Plan	Υ	Υ				
Reasonable Accommodation Procedure	Υ	Υ				
Organization Chart	Υ	Υ				

Procedures	1	ľ	
Agency Strategic Plan	Υ	Υ	
Reasonable Accommodation Procedure	Υ	Υ	
Organization Chart	Υ	Υ	
Personal Assistance Services Procedures	Υ	Υ	
Alternative Dispute Resolution Procedures	Υ	Υ	
EEO Policy Statement	Υ	Υ	
Federal Equal Opportunity Recruitment Program (FEORP) Report	N	N	
Diversity Policy Statement	N	N	

EEOC FORM				
715-02				
PART A - D				

U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

For period covering October 1, 2018 to September 30, 2019

EEOC FORMS and Documents	Required	Uploaded
Disabled Veterans Affirmative Action Program (DVAAP) Report	N	N
Human Capital Strategic Plan	N	N
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	N	Υ
EEO Strategic Plan	N	N

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USDA Risk Management Agency

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EXECUTIVE SUMMARY: MISSION

Part E.1 - Executive Summary: Summary: Mission

RMA Mission:

The Risk Management Agency (RMA) serves America's agricultural producers through effective, market-based risk management solutions. RMA promotes, supports and regulates sound risk management solutions to preserve and strengthen the economic stability of America's agricultural producers. The primary responsibility of RMA is to administer the Federal Crop Insurance Program through the Federal Crop Insurance Corporation (FCIC) in accordance with the Federal Crop Insurance Act. The FCIC is a wholly owned government corporation created in 1938, to provide for nationwide expansion of a comprehensive crop insurance program. RMA is committed to transforming the crop insurance program into a broad-based safety net for producers to assure that American agriculture remains solid, solvent and globally competitive.

RMA Functions:

- Increase the availability and effectiveness of federal crop insurance as a risk management tool while enhancing and protecting the reliability of the program;
- Ensure a fair and effective risk management product delivery system;
- · Provide education and outreach to stakeholders to ensure access to risk management tools and products; and
- · Safeguard the integrity of the Federal Crop Insurance Program.

Results of Self-Assessment:

The USDA's Farm Production and Conservation (FPAC) Civil Rights and Equal Employment Opportunity Division (CREEOD), on behalf of RMA, conducted a self-assessment in Fiscal Year (FY) 2019 to determine the strengths and weaknesses of the Agency's Equal Employment Opportunity (EEO) program as measured against the six essential elements of a model EEO program as described in the MD-715. The essential elements of a model program include: A) demonstrated commitment from agency leadership; B) integration of EEO into the Agency's strategic mission; C) management and program accountability; D) proactive prevention of unlawful discrimination; E) efficiency; and F) responsiveness and legal compliance.

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USDA Risk Management Agency

For period covering October 1, 2018 to September 30, 2019

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

Part E.2 - Executive Summary: Essential Element A - F

DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP (Essential Element A):

RMA management continues to be committed to making RMA a model agency with respect to EEO and Civil Rights principles. On March 9, 2018, the Secretary of the United States of Agriculture (USDA) issued Secretary's Memorandum 1076-023. On May 25, 2018, the Secretary of the United States Department of Agriculture USDA) issued the One-USDA Civil Rights, Anti-Harassment, Reprisal and Retaliation, Sexual Harassment, and Accountability and Procedures Policy Statement. Both policy statements were posted on the Agency's Civil Rights website for employees, applicants, constituents and the general public. (See Supporting Documentation - Exhibit 1)

A link to the USDA's Departmental Regulation (DR) 4300-010, Civil Rights Accountability and Procedures, is included on the Agency's Civil Rights Accountability and Procedures Statement and is posted on the Agency's intranet site for employees to reference. (See Supporting Documentation - Exhibit 2)

Commitment from RMA leadership has continued to be a priority of the Administrator and Chief of Staff. Agency leadership remains committed to making RMA a model agency that respects the civil rights of employees while improving their confidence in the civil rights process. RMA has continued to increase the use of alternative dispute resolution (ADR) at all stages of the informal EEO complaint process.

RMA's inventory of EEO complaints decreased in FY 2019 and reflects improvement in the timeliness of processing EEO complaints of discrimination at the informal stage. The Agency's use of ADR throughout the informal EEO complaint process has resulted in more expeditious resolutions in FY 2019. RMA's ADR services are provided by the USDA's Farm Production and Conservation (FPAC) Civil Rights and Equal Employment Opportunity Division (CREEOD).

INTEGRATION OF EEO INTO THE AGENCY'S STRATEGIC MISSION (Essential Element B)

The FPAC Business Center, which provides strategic planning services for the RMA, is working on a mission-area 2-year operational plan that is planned to be finalized during FY 2020. In the interim, the FPAC mission area falls under the USDA FY 2020-FY 2022 Strategic Plan. (See Supporting Document – Exhibit 3)

The RMA Administrator supports the One-USDA FY 2018 – FY 2022 Strategic Plan which incorporates goals and performance measures which identify the commitment of leadership and program integration. Agency leadership supports RMA's Civil Rights Policies and holds all employees accountable for complying with anti-discrimination laws and regulations.

All employees have an EEO element included in their annual performance plans. RMA leadership continued to engage all levels of its workforce in FY 2019 to be a model agency that respects the civil rights of all employees.

Senior managers serve as Agency Resolving Officials (ARO) during active participation in the ADR process. The following training was completed by RMA employees during FY 2019: Alternative Dispute Resolution Awareness, Anti-Harassment Training: Identifying and Preventing Workplace Harassment, Civil Rights: Recognizing and Preventing Reprisal 2007, EEO and Preventing Discrimination in the Federal Workplace, EEO Training for Non-Supervisory Employees, How Culture Impacts Communication, Mastering Diversity: Managing for Success Under ADA & Other Anti-Discrimination Laws, No Fear Refresher Training, USDA No Fear Act Training, Your Role in Workplace Diversity, Conflict Management Training Webinar Series: The Bully at Work, Working with you is Tough, Civility and Respect in the Workplace.

MANAGEMENT AND PROGRAM ACCOUNTABILITY (Essential Element C)

In FY 2019, RMA Civil Rights data reflected a significant decrease in the number of EEO complaints filed compared to FY 2018. On March 9, 2018, the Secretary of the United States of Agriculture (USDA) issued Secretary's Memorandum 1076-023. On May 25, 2018, the Secretary of the USDA communicated his commitment to civil rights laws, regulations, and policies by issuing the One-USDA Civil Rights, Anti-Harassment, Reprisal and Retaliation, Sexual Harassment, and Accountability and Procedures Policy Statement. Additionally, the RMA Administrator and Chief of Staff share in their commitment to civil rights laws, regulations, and USDA policies. The policy statement was posted on the Agency's Civil Rights website for employees, applicants, constituents, and the general public. With the recent merger of the mission area, the civil

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USDA Risk Management Agency

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EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

rights and anti-harassment statements are being revised and are expected to be issued in FY 2020. Information on the process for filing an EEO complaint of discrimination and contacting an EEO Counselor is posted on the RMA intranet.

PROACTIVE PREVENTION (Essential Element D)

CREEOD has been proactive in the prevention of discrimination by annually developing and submitting an EEO Training Plan to the Office of the Assistant Secretary for Civil Rights (OASCR) that includes civil rights employment training. The following training was completed by RMA employees during FY 2019: Alternative Dispute Resolution Awareness, Anti-Harassment Training: Identifying and Preventing Workplace Harassment, Civil Rights: Recognizing and Preventing Reprisal 2007, EEO and Preventing Discrimination in the Federal Workplace, EEO Training for Non-Supervisory Employees, How Culture Impacts Communication, Mastering Diversity: Managing for Success Under ADA & Other Anti-Discrimination Laws, No Fear Refresher Training, USDA No Fear Act Training, Your Role in Workplace Diversity, Conflict Management Training Webinar Series: The Bully at Work, Working with you is Tough, and Civility and Respect in the Workplace.

In FY 2019, CREEOD worked to ensure that RMA employees understood and complied with the responsibility of reporting employment complaints in a timely manner by conducting Civil Rights Compliance Reviews of the RMA North Carolina field offices. The Compliance Review provided an assessment of the Agency's understanding and compliance with EEO regulations, policies and practices. These reviews were completed through in-person interviews with managers and employees. (See Supporting Documentation - Exhibit 4)

In FY 2019, RMA completed quarterly MD-715 quarterly workforce and barrier analysis reports that were provided to the USDA's OASCR.

RMA continues to support the recruitment of applicants through the USDA Pathways Program, colleges, and universities. The FPAC Business Center's Human Resources Division (HRD) is responsible for the agency's recruitment activity. RMA also recruits from 1890 institutions and representatives regularly attended career days at several universities. (See Supporting Documentation - Exhibit 5). Additionally, two (2) disabled Veterans were hired during the reporting period. RMA hired six (6) employees in FY 2019. RMA addressed low participation at hiring events by focusing outreach efforts toward minority organizations, colleges and universities, including Historically Black Colleges and Universities, and Hispanic serving institutions with the assistance of FPAC's Business Center's HRD.

RMA provided input on the Agency's objectives and initiatives for the annual Federal Equal Opportunity Recruitment Program Report (FEORP) Plan in FY 2019. The input provided details regarding the agency's initiatives to address, through affirmative recruitment, low participation of minorities, women and persons with disabilities in the workforce. The FEORP Plan includes all agencies in the FPAC mission area. The plan was certified on XXXXXX XX, 20XX. (See Supporting Documentation - Exhibit 6)

Senior managers served as Agency Resolving Officials (ARO) during the ADR process. The CREEOD staff regularly participated as EEO Observers for interview panels to fill vacant positions announced by the Agency in FY 2019.

EFFICIENCY (Essential Element E)

In FY 2019, RMA conducted a Civil Rights Compliance Review in North Carolina. Corrective actions were taken for all employment related deficiencies within established timeframes.

RMA prepared the FY 2019 No FEAR Act and FY 2019 462 Reports in a timely manner. (See Supporting Documentation - Exhibits 7 and 8)

RMA's EEO Counselor Reports were prepared in a clear, concise, and well written manner and satisfied established criteria for quality assessment. Alleged claims of employment discrimination were clearly defined which met regulatory fact-finding requirements. There were three (3) informal EEO Complaints filed against RMA in FY 2019; two (2) were withdrawn. There were no settlements during the FY 2019 reporting period.

Informal EEO complaints of discrimination processed in FY 2019 reflect an improvement in processing time at the intake and informal investigation stages. RMA contributes this improvement to effective internal procedures developed by the FPAC CREEOED Director and the utilization of USDA's ADR program throughout the complaint process. The CREEOD nurtured its established working partnership with the OASCR, Human Resources Division (HRD), the Office of the General Counsel (OGC),

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EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

and the ADR Coordinator for working through each stage of the process.

The CREEOD EEO Program staff ensured that complaint files and the iComplaints database were updated and organized in a timely matter and in compliance with Equal Employment Opportunity Commission (EEOC) standards.

Through an inter-agency agreement (IAA), formal complaints of discrimination are handled by the USDA's OASCR.

RESPONSIVENESS AND LEGAL COMPLIANCE (Essential Element F)

The CREEOD, which provides EEO services to the RMA, excelled in the area of responsiveness and compliance in FY 2019. All inquiries, requests and orders from all aspects related to EEO were addressed promptly and included detailed information. Responses made to the EEOC, OASCR, OGC, and HRD were all made in a timely manner.

The CREEOD ensured that all decisions, judgments, and orders issued to the Agency in FY 2019 were implemented and that supporting documentation for compliance reporting requirements and inquiries were provided.

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USDA Risk Management Agency

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EXECUTIVE SUMMARY: WORKFORCE ANALYSES

Part E.3 - Executive Summary: Workforce Analyses

Barrier Trend and Permanent Workforce Analysis

Workforce Composition (Use Table A1 to record data)

RACE	CLF 2010	FY2019	FY2019	FY2018	FY18
		Total	Percentage	Total	Percentage
HM	5.17	6	1.70	10	2.19
HF	4.79	6	1.42	7	1.53
WM	38.33	152	41.76	190	41.58
WF	34.03	119	33.81	142	31.07
BM	5.49	19	5.11	22	4.81
BF	6.53	39	11.08	56	12.25
AM	1.97	5	1.42	9	1.97
AF	1.93	5	1.42	6	1.31
NH/OPIM	0.07	0	0	0	0
NH/OPIF	0.07	0	0	0	0
AI/ANM	0.55	2	0.57	2	0.44
AI/ANF	0.53	5	1.42	7	1.53
TMRM	0.26	0	0	0	0
TMRF	0.28	1	0.28	6	1.31
PWTD	2.00	12	3.41	18	4

Numbers in RED annotate percentages below the CLF.

A copy of the RMA organizational chart and the FY 2019 MD-715 Tables have been provided. (See Supporting Documentation - Exhibits 9 and 10)

The RMA ended FY 2019 with 359 employees (352 permanent employees and 7 temporary employees); RMA continues to be

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EXECUTIVE SUMMARY: WORKFORCE ANALYSES

strongly committed to improving and maintaining a workforce that reflects the same diversity as the public it serves. In comparison to the 2010 Civilian Labor Force (CLF) data, total male employees were 50.57% of the workforce, or 1.29% below the CLF while total females were 49.43% of the workforce, which is 1.29% above the CLF. Hispanic males and females were both below the CLF figures. Hispanic males comprised 1.70% of the workforce which is 3.47% below the CLF, and Hispanic females comprised 1.42% of the workforce which is 3.37% below the CLF. White males were 3.43% above the CLF and were 41.76% of the Agency's workforce; while White females were 33.81% of the workforce which is 0.22% below the CLF. Black or African American males made up 5.11% and Black or African American females made up 11.08% of the workforce; males were below the CLF by 0.38% and females were 4.55% above the CLF. Asian males and females were below the CLF. Asian males comprise 1.42% of the workforce and were 0.55% below the CLF. Asian females comprise 1.42% of the workforce and were 0.51% below the CLF. In FY 2019, Native Hawaiian and Other Pacific Islander males and females remained at 0.00% and were below the CLF by 0.07%, respectively. The male workforce of American Indian or Alaska Native made up 0.57% of the workforce which is 0.02% above the CLF. American Indian or Alaska Native females made up 1.42% of the workforce which is 0.89% above the CLF. Two or More Races males are below the CLF. Two or More Races male employees are 0.00% of the workforce, which is 0.26% below the CLF. However, Two or More Races females comprise 0.28% of the workforce, which is equal to the CLF.

RMA's total workforce of employees with targeted disabilities at the end of FY 2019 was 3.41%. This is 1.41% above the target goal of the EEOC's goal of 2.00% and 0.59% below the Department of Agriculture's goal set at 4.00%.

RMA's efforts to work on and implement effective strategies for increasing low participation of underrepresented groups within the workforce has continued in FY 2019. In FY 2019, the RMA Associate Administrator directed all hiring officials to ensure that vacancy announcements are sent to all sources in an effort to expand and diversify the applicant pool.

In FY 2019, RMA completed quarterly MD-715 workforce and barrier analysis reports that were provided to the USDA's OASCR.

Major Occupations

An analysis of the disability participation rates for major occupations for FY 2019 revealed 3.13% in the Program Management (0340) occupational series have a targeted disability; 5.23% in the General Business and Industry (1101) occupational series have a targeted disability; and 4.17% in the General Investigations (1801) occupational series have a targeted disability.

Other employment occupations that reported employees who self-identified as having a disability are as follows: Economist (series 0110) identified 7.14% of employees; Miscellaneous Clerk and Assistant (0303) identified 12.50% of employees; Program Management (series 0340) identified 12.50% of employees; Management and Program Analysis (0343) identified 20.00% of employees; Accounting (0510) identified 4.76% of employees; General Business and Industry (1101) identified 9.80% of employees; and General Inspection, Investigation and Compliance (1801) identified 8.33% of employees.

Leadership Positions

Workforce analysis for RMA for FY 2019 continues to reflect a lower participation of females at the GS-14 and GS-15 grade levels compared to males at the same grade levels. Similarly, at the Senior Executive Service (SES) level, females reflect 20% compared to 80% of males. The table below reveals the breakdown between males and females at the GS-13, GS-14, GS-15, and SES levels in FY 2019:

PAY RATE	TOTAL NUMBER OF EMPLOYEES	NUMBER OF MALES / (PERCENTAGE)	NUMBER OF FEMALES / (PERCENTAGE)
GS-13	156	78 (50%)	78 (50%)
GS-14	37	22 (59.46%)	15 (40.54%)
GS-15	13	8 (61.54%)	5 (38.46%)

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EXECUTIVE SUMMARY: WORKFORCE ANALYSES

SES

5

4 (80%)

1 (20%)

Females continued to be underrepresented in supervisory positions the SES level in FY 2019.

New Hires

The six permanent new hires in FY 2019 were comprised of two females; the female new hires were white. Of the four males hired during the fiscal year, two were white and two were Black or African American. None of the new hires reported a disability.

Non-Competitive Promotions

In FY 2019, there were 26 employees eligible for non-competitive promotions. Of the 26 employees who received a non-competitive promotion, six (6) were male and eighteen were female. The breakdown of males included five (5) white males and three (3) Black or African American. Female recipients were one (1) Hispanic or Latino, ten (10) white, and one (1) Black or African American. None of the employees receiving a non-competitive promotion reported a disability.

Awards and Employee Recognition/Performance Management

An analysis of MD-715 workforce tables to identify whether any barriers exist for participation in employee award and recognition programs (Table A13), revealed the following:

Time-Off Awards (1-9 Hours): An average of eight (8) hours per recipient were awarded to RMA employees in FY 2019 for a total of 204 hours. Males received 48.15% and females received 51.85% of the time off awards. Of these percentages, the following were received by race and gender: Hispanic or Latino males 0.00%, Hispanic or Latino females 3.70%; White males 37.04%, White females 29.63%; Black or African American males 3.70%, Black or African American females 11.11%; Asian males 3.70%, Asian females, 3.70%; Native Hawaiian or Hawaiian males and females both received 0.00%; American Indian or Alaska Native males 3.70%, American Indian or Alaska Native females received 3.70; and Two or More Races males and females both received 0.00% FY 2019.

Time-Off Awards (9+ Hours): 364 awards of an average of 26 hours were awarded in this category totaling 9,354 hours for FY 2019. Of the total RMA workforce, males received 46.70% and females received 53.30%. The following is a further breakdown of awards in this time-off category: Hispanic or Latino males 2.20%, Hispanic or Latino females 1.65%; White males 39.01%; White females 37.36%; Black or African American males 3.57%; Black or African American females 10.71%; Asian males 1.37%; Asian females 1.10%; Native Hawaiian Pacific Islander males and females 0.00%; American Indian or Alaska Native males 0.55% and females 1.92%; and Two or More Races males 0.00%, females 0.55%.

Cash Awards (\$100-\$500): The average monetary amount of cash awards of \$100-\$500 issued to RMA employees in FY 2019 was \$454. The total monetary cash award at this level was \$14,981. There was a total of 33 cash awards awarded in this dollar range. Males received 39.39% and females received 60.61%. The following is a further breakdown of awards by race and gender: Hispanic or Latino males 0.00%, Hispanic or Latino females 3.03%; White males 36.36%, White females 30.30%; Black or African American males 3.03%, Black or African American females 15.15%; Asian males 0.00%; Asian females 12.12%; Native Hawaiian or Pacific Islander males and females 0.00%; American Indian or Alaska Native males and females 0.00%; and Two or More Races males and females 0.00%.

Cash Awards (\$500+): The average monetary cash award of \$500 or more given in FY 2019 was \$1,864. The total monetary amount of cash awards of \$500 or more was \$745,731. Of the total RMA workforce, males received 52.50% and females received 47.50%. The data reflects the remaining cash awards given in this category were as follows: Hispanic or Latino males 2.00%; Hispanic of Latino females received 1.50%; White males received 44.50% and White females received 33.50%; Black or African American males 4.25% and Black or African American females 9.75%; Asian males 1.25% and Asian females 1.00%; Native Hawaiian or other Pacific Islander males and females received 0.00%; American Indian or Alaska Native males 0.50% and American Indian or Alaska Native females 1.50%, and Two or More Races males 0.00% and Two or More Races females 0.25%.

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EXECUTIVE SUMMARY: WORKFORCE ANALYSES

Quality Step Increases: In FY 2019, four (4) employees were awarded a Quality Step Increase (QSI). The average monetary value of QSIs issued to RMA employees in FY 2019 was \$2,220. The total monetary cash awarded at this award level was \$8,881. The recipients were by sex were one (1) male (25.00%) and three (3) females (75.00%). Of these percentages, the following were received by race and gender: one (1) White male, and three (3) White females.

RMA continues to analyze workforce data to identify patterns, trends and/or barriers that may exist and potentially result in any disparities in awards and recognition among its workforce. RMA completed the FY2019 Cash Awards Program Assessment (See Supporting Documentation – Exhibit 11).

Results of the FY 2019 Agency Performance Plan and Accomplishment Report for RMA reflects sustained improvements as compared to FY 2018 in the Agency's EEO program. RMA continues to focus on Civil Rights and EEO as reflected by the Secretary's initiatives and policies impacting the effectiveness of civil rights throughout the Agency.

Separations

In FY 2019, there were 30 voluntary separations consisting of one (1) Hispanic of Latino male (3.33%), 19 white males (63.33%), eight (8) white females (26.67%), and two (2) Black or African American males (6.67%). Of the 30 voluntary separations, 21 reported no disability, one (1) did not wish to identify a disability or serious health condition, eight (8) reported a non-targeted disability, and two (2) identified a targeted disability. During FY 2019, there were two (2) involuntary separations consisting of one (1) White male and one (1) Asian male. Of the involuntary separations, one (1) reported no disability and one (1) reported disability.

Veteran Hires

RMA added two (2) Veterans to its workforce in FY 2019. The breakdown of hires by GS-levels were as follows: two at the GS-9 level; one (1) was a White female and one (1) was a Black or African American male. Neither hire reported a disability. However, one (1) veteran reported a 5-point disability veterans' preference and one (1) reported a 10-point 30 percent compensable veteran's preference.

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USDA Risk Management Agency

For period covering October 1, 2018 to September 30, 2019

EXECUTIVE SUMMARY: ACCOMPLISHMENTS

Part E.4 - Executive Summary: Accomplishments

RMA accomplished the planned goals identified in the FY 2018 Annual MD-715 Report in conjunction with initiatives set forth by the Secretary of Agriculture, and the CREEOD. The Secretary of the USDA issued the One-USDA Civil Rights, Anti-Harassment, Reprisal and Retaliation, Sexual Harassment, and Accountability and Procedures Policy Statement. The policy statement was posted on the Agency's Civil Rights website for employees, applicants, constituents and the general public. The Secretary's statements were posted in all offices and added to the agency's intranet site. The procedures, effective for all employees, emphasized the responsibility to comply with federal EEO laws and regulatory requirements. The RMA Administrator's commitment to implementing the Secretary's vision of making RMA a model agency that respects the civil rights of its employees was implemented through the completion of EEO training as cited throughout the Executive Summary.

As of September 30, 2019, RMA exceeded the EEOC and its goal of hiring additional employees with targeted disabilities. At the end of the FY 2019 reporting period, RMA had a workforce percentage for employees with targeted disabilities of 3.34%. The EEOC goal is 2%.

Multiple Civil Rights training components were completed during FY 2019. RMA continues to utilize the effectiveness of the ADR program to resolve complaints at the lowest level. Awareness of Accountability and Procedures for individual employees related to EEO were addressed during the compliance review conducted of an RMA field office during the reporting period. In FY 2019, RMA completed quarterly MD-715 quartlery workforce and barrier analysis reports that were provided to the USDA's OASCR.

EEOC FORM 715-02 PART E.5

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EXECUTIVE SUMMARY: PLANNED ACTIVITIES

Part E.5 - Executive Summary: Planned Activities

RMA plans to continue to work toward becoming a model agency in employment. In FY 2020, plans to increase recruitment efforts, in partnership with FPAC's Business Center's servicing HR office, to reduce low employment rates among identified affinity groups. EEO and other related employment training is planned for FY 2020 and will be conducted for all employees (including the No Fear Act comprehensive or refresher versions of the training mandate).

CREEOD, on behalf of RMA, will continue to maintain improved timeframes for processing EEO complaints in the informal stage of the process. CREEOD, on behalf of RMA, will continue its IAA with OASCR for the processing of formal EEO complaints. CREEOD, on behalf of RMA, will conduct additional Compliance Reviews of its offices and partners to demonstrate commitment to compliance with federal EEO laws and regulations.

Compliance Reviews will provide the opportunity to identify EEO knowledge deficiencies within the RMA workforce. RMA senior leadership will be encouraged to engage CREEOD to address civil rights and employment related concerns identified in the Federal Employee Viewpoint Survey (FEVS) conducted in FY 2019. The feedback will be used to implement initiatives to meet employee needs and improve the work environment in FY 2020.

In FY 2020, RMA plans to use various programs and resources to seek out and attract veteran and disabled veteran candidates through the veteran-specific job candidate programs and other resources. These included, but were not limited to the following:

- · Veterans Recruitment Authority (VRA)
- · 30 Percent or more disabled
- · Veteran Employment Opportunities Act (VEOA)
- Schedule A Hiring Authority
- USDA's Veterans and Persons with Disabilities Repository
- · Department of Defense Hiring Our Hero's job Fairs
- · The Department of Veteran Affairs (VA), Vocational Rehabilitation & Employment (VR&E), Non-Paid Work Experience (NPWE)
- · Operation War Fighter
- · Feds Hire Vets
- · Army Wounded Warrior Program
- · Soldier for Life
- · Marine for Life

Disability Employment Program (DEP)

In FY 2020, RMA plans to:

- · Establish targeted recruitment efforts to increase the participation of persons with disabilities.
- · Ensure the internal MD-715 affirmative employment workgroup discusses ongoing recruitment and hiring initiatives and identify potential barriers that may affect employment opportunities for persons with disabilities.

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EXECUTIVE SUMMARY: PLANNED ACTIVITIES

- · Develop a plan, which uses different programs and resources to identify and hire job applicants with disabilities, including those with targeted disabilities.
- · Develop a plan to train all managers on the use of special hiring authorities.
- · Continue to establish and maintain contacts with organizations that assist persons with disabilities in securing employment.
- · Establish plan to improve career advancement opportunities for persons with disabilities.
- Analyze workforce separation data to identify barriers retaining employees with disabilities.

Employee Development

New Strategic Leadership Training Program (SLDP) Class

RMA seeks to develop a leadership cadre that represents the diverse communities and customers we serve. The assessments of current and future needs are being accomplished through a series of leadership competency models that are accessible to all employees.

One of the career development opportunities is provided to RMA employees is the Strategic Leadership Development Program (SLDP).

FPAC has partnered with the Center for Excellence in Public Leadership (CEPL) at the George Washington University to develop and administer the FPAC Mission Area SLDP. The program is designed to develop a pool of effective leaders who can move into positions with increasing strategic responsibilities within the agency over the next five (5) years.

The Human Resources Division (HRD), Employee Development Section (EDS), is currently accepting applications for the calendar year (CY) 2020 10-month SLDP that will begin on February 24, 2020, for aspiring leaders. The program focuses on deepening knowledge and practicing skills and will include classroom training (virtual or in-person), participating on learning teams, coaching, mentoring, a targeted stretch assignment, and a substantive group project focused on an agency priority, challenge, or opportunity. The SLDP will prepare participants to serve effectively as strategic leaders within the FPAC-BC, Farm Service Agency (FSA), Natural Resources Conservation Service (NRCS), and Risk Management Agency (RMA), and potentially move into positions with increasing responsibility in future years.

The SLDP is built around the FPAC Leadership Development Framework (LDF), Office of Personnel Management's (OPM) Executive Core Qualifications, and FPAC leadership competencies. The program will introduce participants to supervisory and leadership theories, techniques, and concepts applicable to management theories in the public sector. Each SLDP participant will be aligned with a mentor/sponsor.

The SLDP is a 10-month program that includes the following learning platforms:

- (a) Web-based training (WBT)
- (b) Classroom and /or synchronous virtual learning environment
- (c) Mentoring
- (d) Learning teams
- (e) Action learning coaching
- (f) Stretch assignments (will be chosen by the participant)
- (g) Group projects focused on an agency priority, challenge, or opportunity

EEOC FORM 715-02 PART F

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CERTIFICATION of ESTABLISHMENT of CONTINUING EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS

Emily Su, Director

am the

(Insert Name Above)

(Insert official title/series/grade above)

Principal EEO Director/Official for

USDA-FPAC-BC-Civil Rights and EEO Division

(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.

May 26, 2020
Signature of Principal EEO Director/Official Date

Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with

EEO MD-715.

Signature of Agency Head or Agency Head Designee Date

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	Essential Element: A Demonstrated Commitment From agency Leadership							
→	Compliance Indicator		1	ıre Has n Met		For all unmet measures, provide		
•	Measures	A.1. The agency issues an effective, up-to-date EEO policy statement.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report		
clearly co	ommunicates the age	ally issue a signed and dated EEO policy statement on agency letterhead that ency's commitment to EEO for all employees and applicants? If "Yes", please date in the comments column. [see MD-715, ll(A)]			X	One-Policy EEO/ CR Statement & Anti-Harassment memorandum were issued by the Secretary May 25, 2018 and March 8, 2018 respectively - https:// www.ascr.usda.govsites/default/files/ USDA%20Anti %20Harassment %20Policy Signed %20Copy.pdf https:// www.rma.usda.govmedia/RMAweb/ AboutRMA/Civil- Rights/Secretarys- Memorandum- Strengthening- Civil-Rights- Management- Functions.ashx? la=en		
pregnancy reprisal) c	y, sexual orientation contained in the law ional bases (e.g., ma	statement address all protected bases (age, color, disability, sex (including n and gender identity), genetic information, national origin, race, religion, and vs EEOC enforces? [see 29 CFR § 1614.101(a)] If the EEO policy statement covers arital status, veteran status and political affiliation), please list them in the			х	We reference the Department's policy.		

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	• •				
Compliance Indicator			ire Has n Met		For all unmet measures, provide
Measures	A.2. The agency has communicated EEO policies and procedures to all employees.	Yes	No	N/A	a brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
A.2.a. Does the agency disse	minate the following policies and procedures to all employees:				
A.2.a.1. Anti-harassment pol	icy? [see MD 715, ll(A)]	X			
A.2.a.2. Reasonable accomm	odation procedures? [see 29 CFR § 1614.203(d)(3)]	X			
A.2.b. Does the agency promwebsite:	inently post the following information throughout the workplace and on its public				
	t information for its EEO Counselors, EEO Officers, Special Emphasis Program ?? [see 29 C.F.R § 1614.102(b)(7)]	X			
A.2.b.2. Written materials co complaint process? [see 29 C	ncerning the EEO program, laws, policy statements, and the operation of the EEO FR §1614.102(b)(5)]	X			
A.2.b.3. Reasonable accomminternet address in the comm	nodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the ents column.			X	We reference the Departmental policy. https:// www.ocio.usda.go document/ departmental- manual-4300-002
A.2.c. Does the agency infor	m its employees about the following topics:				
	ess? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If "yes", please provide which such training is delivered.	х			Annual Departmental or Agency-Level training includes a detailed synopsis of the EEO process for Agency personnel by web-based or classroom methodologies.
A.2.c.2. ADR process? [see]	MD-110, Ch. 3(II)(C)] If "yes", please provide how often.	X			Annually .
A.2.c.3. Reasonable accomm how often.	odation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If "yes", please provide	Х			Annually.
	gram? [see EEOC Enforcement Guidance on Vicarious Employer Liability for pervisors (1999), § V.C.1] If "yes", please provide how often.	Х			Annually.
A.2.c.5. Behaviors that are in §2635.101(b)] If "yes", pleas	appropriate in the workplace and could result in disciplinary action? [5 CFR se provide how often.	Х			Annually.

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	Compliance Indicator		Measu Beer	re Has Met		For all unmet measures, provide a
+	Measures	A.3. The agency assesses and ensures EEO principles are part of its culture.	A.3. The agency assesses and ensures EEO principles are part of its culture. Yes No N/A		brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report	
superior a	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.					When applicable, employees or supervisors are recognized for their superior achievements by the Administrator via the Agency's Civil Rights Leadership Award or the agency-wide employee recognition ceremony.
		te the Federal Employee Viewpoint Survey or other climate assessment tools to EO principles within the workforce? [see 5 CFR Part 250]'	x			

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Essential Element: B Integration of EEO into the agency's Strategic Mission								
	Compliance Indicator			Measure Has Been Met		For all unmet measures, provide a		
•	Measures	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.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report		
	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)]							
agency h		does not report to the agency head, does the EEO Director report to the same mission-related programmatic offices? If "yes," please provide the title of the comments.	х			The EEO Director reports directly to the FPAC BC Chief Operating Officer.		
	Does the agency's o 514.102(b)(4)]	organizational chart clearly define the reporting structure for the EEO office? [see 29	X					
manager	nent officials of the	or have a regular and effective means of advising the agency head and other senior effectiveness, efficiency and legal compliance of the agency's EEO program? [see D-715 Instructions, Sec. I]	X					
manager program	nent officials, the "S and the status of the	period, did the EEO Director present to the head of the agency, and other senior State of the agency" briefing covering the six essential elements of the model EEO e barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide e comments column.		х		State of the Agency briefing will be provided to the head of the agency in FY 2020.		
		or regularly participate in senior-level staff meetings concerning personnel, budget, Force issues? [see MD-715, II(B)]	X					

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Compliance Indicator		Measure Has Been Met									For all unmet measures, provide
Measures B	B.2. The EEO Director controls all aspects of the EEO program.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report						
to promote EEO and to identify	consible for the implementation of a continuing affirmative employment program y and eliminate discriminatory policies, procedures, and practices? [see MD-110, 02(c)] If not, identify the office with this authority in the comments column.	Х									
B.2.b. Is the EEO Director resp §1614.102(c)(4)]	ponsible for overseeing the completion of EEO counseling? [see 29 CFR	Х									
	consible for overseeing the fair and thorough investigation of EEO complaints? [This question may not be applicable for certain subordinate level components.]			x	Through an Inter- Agency Agreement with USDA's Office of the Assistant Secretary for Civil Rights for the processing of formal complaints.						
	ponsible for overseeing the timely issuance of final agency decisions? [see 29 uestion may not be applicable for certain subordinate level components.]			Х	Through an Inter- Agency Agreement with USDA's Office of the Assistant Secretary for Civil Rights for the processing of formal complaints.						
B.2.e. Is the EEO Director resp 1614.102(e); 1614.502]'	ponsible for ensuring compliance with EEOC orders? [see 29 CFR §§	Х									
	onsible for periodically evaluating the entire EEO program and providing ment to the agency head? [see 29 CFR §1614.102(c)(2)]	X									
	dinate level components, does the EEO Director provide effective guidance and tts? [see 29 CFR §§ 1614.102(c)(2); (c)(3)]	Х									

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*	Compliance Indicator		Measure Has Been Met					For all unmet measures, provide
	Measures	B.3. The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report		
EEO issu	ies, including strateg	cials participate in agency meetings regarding workforce changes that might impact gic planning, recruitment strategies, vacancy projections, succession planning, and edvelopment opportunities? [see MD-715, II(B)]	Х					
	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.				х	We refer to the Department's FY2020-FY2022 Plan.		

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Compliance Indicator		1	ıre Has n Met		For all unmet measures, provide a
Measures	B.4. The agency has sufficient budget and staffing to support the success of its EEO program.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
	1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to EEO program, for the following areas:				
B.4.a.1. to conduct a self-ass	sessment of the agency for possible program deficiencies? [see MD-715, II(D)]	X			
B.4.a.10. to effectively mana	age its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]	X			
B.4.a.11. to ensure timely an	nd complete compliance with EEOC orders? [see MD-715, II(E)]	X			
B.4.a.2. to enable the agency	y to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	X			
	y, and fairly process EEO complaints, including EEO counseling, investigations, egal sufficiency reviews? [see 29 CFR §§ 1614.102(c)(5); 1614.105(b) – (f); IV); MD-715, II(E)]	х			
retaliation, harassment, relig	visors and employees with training on the EEO program, including but not limited to ious accommodations, disability accommodations, the EEO complaint process, and nd III(C)] If not, please identify the type(s) of training with insufficient funding in	х			
	a, accurate, and effective field audits of the EEO programs in components and the see 29 CFR §1614.102(c)(2)]	X			
B.4.a.6. to publish and distril accommodations procedures	bute EEO materials (e.g. harassment policies, EEO posters, reasonable)? [see MD-715, II(B)]	X			
tracking, workforce demogra	e data collection and tracking systems for the following types of data: complaint aphics, and applicant flow data? [see MD-715, II(E)] If not, please identify the ading in the comments section.	Х			
Employment Program, and F	ister its special emphasis programs (such as, Federal Women's Program, Hispanic People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR (2(t) and (u); 5 CFR § 315.709]	Х			
	ge its anti-harassment program? [see MD-715 Instructions, Sec. I; EEOC ficarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.	Х			
B.4.b. Does the EEO office 1 1614.102(a)(1)]	have a budget that is separate from other offices within the agency? [see 29 CFR §	X			
B.4.c. Are the duties and res	ponsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), &	X			
	re that all new counselors and investigators, including contractors and collateral required 32 hours of training, pursuant to Ch. 2(II) (A) of MD-110?	X			
	re that all experienced counselors and investigators, including contractors and eceive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of	х			

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Agency Self-Assessment Checklist Measure Has For all unmet Compliance Been Met measures, provide Indicator brief explanation the space below or B.5. The agency recruits, hires, develops, and retains supervisors and managers complete and who have effective managerial, communications, and interpersonal skills attach Measures Yes No N/A an EEOC FORM 715-01 PART H to the agency's status report 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					
B.5.a.2. Reasonable Accommodation Procedures? [see 29 CFR § 1614.102(d)(3)]						
B.5.a.3. Anti-harassment policy? [see MD-715(II)(B)]	X			<u> </u>		
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)]	Х					
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					
Compliance Indicator		Measure Has Been Met				For all unmet measures, provide
B.6. The agency involves managers in the implementation of its EEO program. Measures	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report		
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]			х	Creation of the FPAC mission has caused a reorganization effort that is still in process.		
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]			х	Creation of the FPAC mission has caused a reorganization effort that is still in process.		
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)]			х	Creation of the FPAC mission has caused a reorganization effort that is still in process.		
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		Essential Element: C Management and Program Accountability						
1	Compliance Indicator		Measure Has Been Met		11201131110 22113			For all unmet measures, provide a
	Measures	C.1. The agency conducts regular internal audits of its component and field offices.	Yes	No N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report			
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			We have an approved annual review schedule.		
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.			Х			We have an approved annual review schedule.		
	o the component and it? [see MD-715, II(d field offices make reasonable efforts to comply with the recommendations of the (C)]	х					

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	Agency Sen-Assessment Cheeking				
Compliance Indicator			ıre Has n Met		For all unmet measures, provide
↓ Measures	C.2. The agency has established procedures to prevent all forms of EEO discrimination.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
EEOC's enforcement gu	tablished comprehensive anti-harassment policy and procedures that comply with idance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability t by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]			х	We currently use the Department's policy. FPAC is in the process of drafting FPAC mission-wide policy.
to the level of unlawful l	rassment policy require corrective action to prevent or eliminate conduct before it rises harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Supervisors (1999), § V.C.1]			Х	Following the Department and awaiting EEOC approval.
	established a firewall between the Anti-Harassment Coordinator and the EEO Director? el EEO Program Must Have an Effective Anti-Harassment Program (2006)]	X			
allegations? [see Enforce	have a separate procedure (outside the EEO complaint process) to address harassment ement Guidance on Vicarious Employer Liability for Unlawful Harassment by at Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Х			
	ensure that the EEO office informs the anti-harassment program of all EEO counseling ent? [See Enforcement Guidance, V.C.]	X			
allegations, including the Veterans Affairs, EEOC Commissary Agency), E	conduct a prompt inquiry (beginning within 10 days of notification) of all harassment ose initially raised in the EEO complaint process? [see Complainant v. Dep't of Appeal No. 0120123232 (May 21, 2015); Complainant v. Dep't of Defense (Defense EOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage iries in the comments column.	Х			
C.2.a.6. Do the agency's harassment? [see 29 CFI	training materials on its anti-harassment policy include examples of disability-based \$\\$ \\$ \\$ \\$ \\$ \\$ \\$ \\$ \\$ \\$ \\$ \\$ \\$	X			
	tablished disability reasonable accommodation procedures that comply with EEOC's [see 29 CFR §1614.203(d)(3)]	х			RMA has an Inter- Agency Agreement with USDA's FSA that includes providing reasonable accommodation services to the RMA and issuing associated procedures.
	ated agency official or other mechanism in place to coordinate or assist with processing commodations throughout the agency? [see 29 CFR §1614.203(d)(3)(D)]	X			
C.2.b.2. Has the agency the EEO Director? [see I	established a firewall between the Reasonable Accommodation Program Manager and MD-110, Ch. 1(IV)(A)]	X			
	rensure that job applicants can request and receive reasonable accommodations during ment processes? [see 29 CFR §1614.203(d)(1)(ii)(B)]	X			

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Agency Self-Assessment Checklist								
C.2.b.4. Do the reasonable accommodation procedures clearly state that the agency within a maximum amount of time (e.g., 20 business days), as established by the ag plan? [see 29 CFR §1614.203(d)(3)(i)(M)]		x						
C.2.b.5. Does the agency process all initial accommodation requests, excluding ong within the time frame set forth in its reasonable accommodation procedures? [see M provide the percentage of timely-processed requests, excluding ongoing interpretatic column.	ID-715, II(C)] If "no", please	х						
C.2.c. Has the agency established procedures for processing requests for personal accomply with EEOC's regulations, enforcement guidance, and other applicable exectandards? [see 29 CFR §1614.203(d)(6)]			X	Following the Department and awaiting EEOC approval.				
C.2.c.1. Does the agency post its procedures for processing requests for Personal As public website? [see 29 CFR §1614.203(d)(5)(v)] If "yes", please provide the interrollumn.			х	Following the Department. The procedure is currently being revised.				

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Compliance Indicator		Measure Has Been Met			For all unmet measures, provide
Measures	C.3. The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
	1614.102(a)(5), do all managers and supervisors have an element in their valuates their commitment to agency EEO policies and principles and their gram?	х			
C.3.b. Does the agency required on the following activities:	ire rating officials to evaluate the performance of managers and supervisors based				
C.3.b.1. Resolve EEO proble MD-110, Ch. 3.I]	ems/disagreements/conflicts, including the participation in ADR proceedings? [see	X			
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)]		Х			
C.3.b.3. Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]		Х			
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]					
C.3.b.5. Provide religious acc 29 CFR §1614.102(a)(7)]	commodations when such accommodations do not cause an undue hardship? [see	X			
C.3.b.6. Provide disability ac 29 CFR §1614.102(a)(8)]	ecommodations when such accommodations do not cause an undue hardship? [see	X			
C.3.b.7. Support the EEO program in identifying and removing barriers to equal opportunity? [see MD-715, II(C)]		Х			
C.3.b.8. Support the anti-hara Enforcement Guidance, V.C.	assment program in investigating and correcting harassing conduct?. [see .2]	X			
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)]		х			
C.3.c. Does the EEO Directo or disciplinary actions, for m §1614.102(c)(2)]	or recommend to the agency head improvements or corrections, including remedial nanagers and supervisors who have failed in their EEO responsibilities? [see 29 CFR	Х			
	or recommends remedial or disciplinary actions, are the recommendations regularly [see 29 CFR §1614.102(c)(2)]	Х			

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	1	

C.4. The agency ensures effective coordination between its EEO program and Human Resources (HR) program.	Yes			brief explanation		
		No	N/A	the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report		
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]	х					
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)]	х					
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)]	х			Captured by the FPAC's Human Resources Division office.		
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)]	х					
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	1	Measure Has Been Met				For all unmet measures, provide
C.5. Following a finding of discrimination, the agency explores whether it should take a disciplinary action.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report		
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.	х			Zero. There were no disciplinary/ sanctioning actions necessary.		
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)]			х	There were no findings of discrimination.		

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	Compliance Indicator			re Has Met		For all unmet measures, provide
	Measures	C.6. The EEO office advises managers/supervisors on EEO matters.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
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			Regularly (weekly, monthly, and/or Annually).
	e EEO officials read Instructions, Sec. I]	dily available to answer managers' and supervisors' questions or concerns? [see	х			

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	Essential Element: D Proactive Prevention				
Compliance Indicator			Measure Has Been Met		For all unmet measures, provide a
Measures	D.1. The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
D.1.a. Does the agency have I]	a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec.	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]					
	uct exit interviews or surveys that include questions on how the agency could ing, inclusion, retention and advancement of individuals with disabilities? [see 29]	Х			
Compliance Indicator			re Has 1 Met		For all unmet measures, provide
Measures	D.2. The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
D.2.a. Does the agency have MD-715, (II)(B)]	a process for analyzing the identified triggers to find possible barriers? [see	X			
D.2.b. Does the agency regu practices by race, national or	larly examine the impact of management/personnel policies, procedures, and igin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	X			
	ider whether any group of employees or applicants might be negatively impacted arce decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)	x			
grievance data, exit surveys, evaluations, anti-harassment	larly review the following sources of information to find barriers: complaint/ employee climate surveys, focus groups, affinity groups, union, program program, special emphasis programs, and/or external special interest groups? [see] If "yes", please identify the data sources in the comments column.	х			iComplaints, Immediate EEO Office, and the Human Resources Division.
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			For all unmet measures, provide
Yes	No	N/A	a brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
		х	Creation of the FPAC mission has caused a reorganization effort that is still in process.
		х	Creation of the FPAC mission has caused a reorganization effort that is still in process.
		х	Creation of the FPAC mission has caused a reorganization effort that is still in process.
1			For all unmet measures, provide
Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
x			https:// www.rma.usda.gov media/RMAweb/ AboutRMA/Civil- Rights/FY2018- Affirmative- Action-Plan-Part- J.ashx?la=en
х			
X			
х			
	Yes Measure Beer Yes X X	Yes No Measure Has Been Met X X X X	Yes No N/A X Measure Has Been Met Yes No N/A X X X X X X X X X

EEOC FORM 715-02 PART G		FEDERAL AC	nt Opportunity Commission GENCY ANNUAL I STATUS REPORT
	USDA Risk Management Agency		For period covering October 1, 2018 to September 30, 2019
		Agency Self-Assessmer	nt Checklist
	Essential Element: E Effic	ciency	

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	Agency Self-Assessment Checklist				
Compliance Indicator		1	ire Has 1 Met		For all unmet measures, provide
Measures	E.1. The agency maintains an efficient, fair, and impartial complaint resolution process.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
E.1.a. Does the agency timel	y provide EEO counseling, pursuant to 29 CFR §1614.105?	X			
	ide written notification of rights and responsibilities in the EEO process during the ursuant to 29 CFR §1614.105(b)(1)?	X			
E.1.c. Does the agency issue to MD-110, Ch. 5(I)?	acknowledgment letters immediately upon receipt of a formal complaint, pursuant	х			Through an Inter- Agency Agreement with the USDA Office of the Assistant Secretary for Civil Rights.
	acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after ounselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average lents.	х			60 days. Through an Inter-Agency Agreement with the USDA Office of the Assistant Secretary for Civil Rights.
	re that all employees fully cooperate with EEO counselors and EEO personnel in the ting routine access to personnel records related to an investigation, pursuant to 29	Х			
E.1 f. Does the agency timel	y complete investigations, pursuant to 29 CFR §1614.108?	х			Through an Inter- Agency Agreement with the USDA Office of the Assistant Secretary for Civil Rights.
	timely complete investigations, does the agency notify complainants of the date by be completed and of their right to request a hearing or file a lawsuit, pursuant to 29	х			
E.1 h. When the complainan pursuant to 29 CFR §1614.1	t did not request a hearing, does the agency timely issue the final agency decision, 10(b)?	Х			Through an Inter- Agency Agreement with the USDA Office of the Assistant Secretary for Civil Rights.
E.1.i. Does the agency timely judge's decision, pursuant to	y issue final actions following receipt of the hearing file and the administrative 29 CFR §1614.110(a)?	х			Through an Inter- Agency Agreement with the USDA Office of the Assistant Secretary for Civil Rights.

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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.	х			Through an Inter- Agency Agreement with the USDA's Office of the Assistance Secretary for Civil Rights.
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.1.1. 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			
Compliance Indicator		ıre Has n Met		For all unmet measures, provide
E.2. The agency has a neutral EEO process. Measures	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
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.	х			Through a separate USDA organization (Agency), the USDA's Office of General Counsel.
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			The USDA's Office of General Counsel.
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			
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)]				
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			

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Compliance Indicator			ire Has n Met		For all unmet measures, provide a
Measures	E.3. The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
	ished an ADR program for use during both the pre-complaint and formal complaint [see 29 CFR §1614.102(b)(2)]	X			
E.3.b. Does the agency requi	ire managers and supervisors to participate in ADR once it has been offered? [see	X			
E.3.c. Does the Agency enco 3(IV)(C)]	ourage all employees to use ADR, where ADR is appropriate? [See MD-110, Ch.	X			
E.3.d. Does the agency ensu resolution process? [see MD	re a management official with settlement authority is accessible during the dispute 0-110, 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)]					
E.3 f. Does the agency annu	ally evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	X			
Compliance Indicator		Measure Has Been Met			For all unmet measures, provide
Measures	E.4. The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
E.4.a. Does the agency have	systems in place to accurately collect, monitor, and analyze the following data:				
	including the issues and bases of the complaints, the aggrieved individuals/ ved management official? [see MD-715, II(E)]	X			
E.4.a.2. The race, national or	rigin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	X			
E.4.a.3. Recruitment activiti	2 7 7 72	X			
E.4.a.4. External and interna disability status? [see MD-7	ll applicant flow data concerning the applicants' race, national origin, sex, and 15, II(E)]	Х			
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 co Vicarious Employer Liabilit	omplaints for the anti-harassment program? [see EEOC Enforcement Guidance on y for Unlawful Harassment by Supervisors (1999), § V.C.2]	X			
E.4.b. Does the agency have Instructions, Sec. I]	a system in place to re-survey the workforce on a regular basis? [MD-715	X			

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Compliance Indicator		Measu Been	re Has Met		For all unmet measures, provide
Measures	E.5. The agency identifies and disseminates significant trends and best practices in its EEO program.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
	tor trends in its EEO program to determine whether the agency is meeting its sEEOC enforces? [see MD-715, II(E)] If "yes", provide an example in the	х			Compliance reviews, quarterly analysis of workforce data on promotions/ hiring, barrier analysis of affinity groups, complaint activity reports, settlement/order compliance reports, and by issuing an annual MD-715 report to the EEOC, including FY18.
	w other agencies' best practices and adopt them, where appropriate, to improve the gram? [see MD-715, II(E)] If "yes", provide an example in the comments.	х			Participating in the USDA's quarterly MD-715 workgroup meetings.
E.5.c. Does the agency comp [see MD-715, II(E)]	pare its performance in the EEO process to other federal agencies of similar size?	х			

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Essential Ele	ment: F Responsiveness and Legal Compliance				
Compliance Indicator			sure Has en Met		For all unmet measures, provide a
	has processes in place to ensure timely and full compliance with a settlement agreements.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
F.1.a. Does the agency have a system of manage EEOC orders/directives and final agency action	gement controls to ensure that its officials timely comply with as? [see 29 CFR §1614.102(e); MD-715, II(F)]	X			
F.1.b. Does the agency have a system of manage compliance with resolutions/settlement agreem	gement controls to ensure the timely, accurate, and complete ents? [see MD-715, II(F)]	X			
F.1.c. Are there procedures in place to ensure the [see MD-715, $\Pi(F)$]	ne timely and predictable processing of ordered monetary relief?	X			
F.1.d. Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]					
	ompliance by the agency, does the agency hold its compliance ad/or delays during performance review? [see MD-110, Ch. 9(IX)	Х			
(H)]					
(H)] Compliance Indicator			re Has 1 Met		For all unmet measures, provide
Compliance Indicator F.2. The agency of the second	complies with the law, including EEOC regulations, management, and other written instructions.			N/A	
Compliance Indicator F.2. The agency directives, orders		Beer	n Met	N/A	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
Compliance Indicator F.2. The agency directives, orders F.2.a. Does the agency timely respond and fully II(E)]	y comply with EEOC orders? [see 29 CFR §1614.502; MD-715,	Beer Yes	n Met	N/A	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
Compliance Indicator F.2. The agency directives, orders Measures F.2.a. Does the agency timely respond and full II(E)] F.2.a.1. When a complainant requests a hearing appropriate EEOC hearing office? [see 29 CFR	y comply with EEOC orders? [see 29 CFR §1614.502; MD-715, g, does the agency timely forward the investigative file to the .§1614.108(g)] on that is not the subject of an appeal by the agency, does the	Yes X	n Met	N/A	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
Compliance Indicator F.2. The agency directives, orders Measures F.2. The agency directives, orders F.2.a. Does the agency timely respond and fully II(E)] F.2.a.1. When a complainant requests a hearing appropriate EEOC hearing office? [see 29 CFR F.2.a.2. When there is a finding of discriminating agency ensure timely compliance with the order	y comply with EEOC orders? [see 29 CFR §1614.502; MD-715, g, does the agency timely forward the investigative file to the s§1614.108(g)] on that is not the subject of an appeal by the agency, does the rs of relief? [see 29 CFR §1614.501] oes the agency timely forward the investigative file to EEOC's	Yes X	n Met	N/A	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

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-	Compliance Indicator			re Has 1 Met		For all unmet measures, provide a
+	Measures	F.3. The agency reports to EEOC its program efforts and accomplishments.	Yes	No	N/A	brief explanation in the space below or complete and attach an EEOC FORM 715- 01 PART H to the agency's status report
	oes the agency timel (May 15, 2002), §20	y submit to EEOC an accurate and complete No FEAR Act report? [Public Law 13(a)]			x	We submit the annual report to the Department.
F.3.b. Do §1614.70		y post on its public webpage its quarterly No FEAR Act data? [see 29 CFR	х			We submit to the Department who separates by sub- agency. https:// www.usda.gov/ nofear/agencies

Essential Element: O Other