

EEO
Self-Study Course
For
Managers and
Supervisors

January 2014

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Know How to Handle EEO Complaints

Even the greatest care cannot eliminate the possibility of an EEO Complaint against you.

What happens to that complaint may depend in good part on how you react. You could make things worse by reacting with anger, or you could limit damage and encourage resolution by reacting calmly and professionally.

Mistakes to Avoid

Two common mistakes by managers in this situation are apt to make things worse for your agency and for you personally.

Do not:

1. Refuse to cooperate with the EEO process.
2. Retaliate against the complaining employee.

The first point covers the initial handling of the complaint by the EEO counselor, any later EEO investigation (including testimony before an Equal Employment Opportunity Commission administrative judge,) and alternative dispute resolution if it is offered by your agency.

The second point covers your behavior regarding the complaining employee. Any attempt to interfere with your employee's EEO activity, or harass or otherwise discriminate, may provoke an additional complaint of retaliation.

Support Agency Interests – and Your Own

Your agency must defend itself against liability for discrimination. Your job is to assist that effort. This means coordination with agency attorneys and HR at all stages of the process, provision of required information and documentation, and truthful testimony. If your agency offers ADR and asks you to participate, do so in good faith. And if your agency decides to settle the complaint, don't make yourself an obstacle.

What if there are aspects of your behavior relating to the complaint you don't feel good about? The best thing is to be forthcoming from the beginning. This may allow for an early resolution and minimize any damage to your career. Otherwise, you risk blindsiding your agency representatives at a later stage with unfortunate consequences all around.

That said, remember that your agency HR and legal offices represent your agency's interests, not your own. You are entitled to personal representation at any stage in the process.

From Managing Today's Federal Employees

Off-limits Interview Questions

There are certain topics which are completely off-limits during job interviews. However, that shouldn't be a problem for you, because any questions you plan to ask must be reviewed and approved by our Human Resources Office. Still you might be surprised by a few of the things you can't legally ask, like the following:

Are you married? Do you have or plan to have children? Are you pregnant?

These questions require the interviewee to reveal marital status, pregnancy status, and perhaps sexual orientation. If you have concerns about an applicant's ability to work a swing shift, complete overtime work, travel, TDY, or meet other requirements, then ask the applicant about their ability to meet those job-related demands, and leave the personal details out of it.

Where are you from? Is English your primary language? What religious holidays do you observe?

Inquiring about an applicant's national origin or religion is another no-no. The questions above come too close to that topic, so instead reframe the questions to clarify whether the applicant can speak and understand English, if that is indeed a requirement of the job. But steer clear of anything that even flirts with probing an individual's national origin or religion.

Do you drink alcohol?

This question, while seemingly direct, violates the Americans with Disabilities Act because alcoholism treatment is protected under the ADA. An applicant does not have to reveal any disability information during an initial interview, so stay away from questions related to alcohol use. Be careful, too, when inquiring about the illegal use of drugs.

Every question you ask should focus on answering this: "How are you qualified to perform the job you are applying for? Managers can land in trouble when they ask for information that's irrelevant to a candidate's ability to do the job.

Federal law prohibits discrimination based on an applicant's race, color, national origin, religion, sex, age, disability, or genetic information. Marital status and sexual orientation are also protected factors.

To avoid the appearance of discrimination during interviews, you should not ask these questions:

- If you are single, are you living with anyone?
- How old are you?
- Do you have children? If so, how many and how old are they?
- Do you own or rent your home?
- What church do you attend?

- Do you have any debts?
- Do you belong to any social or political groups?

The following questions relating to a person's health could result in a complaint under disability law.

- Do you suffer from an illness or disability?
- Have you ever been treated for any of these conditions or diseases?
- Have you been hospitalized? What for?
- Have you ever been treated by a psychiatrist or psychologist?
- Have you had a major illness recently?
- How many days of work did you miss last year because of illness?
- Do you have any disability impairments that might affect your performance on this job?
- Are you taking any prescribed drugs?
- Have you ever been treated for drug addiction or alcoholism?

Here are some questions that many selecting officials ask women they don't ask men.

- Do you plan to get married?
- What are your day care plans?
- Are you comfortable supervising men?
- What would you do if your husband was transferred?
- Do you think you could perform the job as well as a man?
- Are you likely to take time off under the Family and Medical Leave Act?

If the interviewee reveals information that you're not allowed to ask, don't pursue the topic further; change the subject right away.

Just remember, when you have interviews to conduct, you can't "wing it." Your interview questions must be approved by the Human Resources Office.

From Manager's Legal Bulletin

Don't Stand Idle When Religious Accommodation Is Requested

You may be required to accommodate the religious practices of your employees unless a requested accommodation would impose an undue hardship.

Undue hardship can be shown when the proposed accommodation would impose more than a minimal cost on your agency. But don't be fooled into thinking the Equal Employment Opportunity Commission isn't serious about requiring agencies to make every effort to accommodate the religious needs of their employees.

The EEOC notes that work schedules that conflict with religious obligations can be addressed through voluntary substitutes and swaps, flexible scheduling, lateral transfers, and assignment changes as ways to accommodate employees. These aren't simple suggestions that can safely be ignored. An agency can't claim that allowing an employee time off for religious obligations would be an undue hardship unless it has actually tried the options set out in the regulations.

Consider the EEOC's recent decision in *White v. Department of Defense, Defense Commissary Agency*. The employee, a part-time meat cutter at a commissary facility said she was subjected to discrimination on the basis of her religion (Baptist) when her request for an accommodation that would allow her to attend church services on Sundays was denied.

Sunday Work Required

The evidence showed that the agency provided the employee with a flexible schedule that allowed her to both work and attend church on Sundays. The agency also explained that Sunday was the busiest day at the facility and allowing the complainant the whole day off would be an undue hardship because it would leave her department understaffed.

The EEOC ruled against the agency. It noted the complainant's husband was the minister of her church, and that church services included Sunday School in the mornings, as well as church meetings that extended into the afternoon. She requested the entire day off to observe her faith, but the schedule the agency offered did not allow her to attend both the morning and afternoon meetings.

The EEOC concluded that the agency did not show it made a good-faith effort to accommodate the complainant's religious beliefs because there was no evidence it made any attempt to arrange voluntary substitutes or swaps for the Sundays the complainant was on the schedule. This might have been possible, given the fact that there were six meat cutters who had Sunday off. Based on the agency's lack of effort, the EEOC found its claim of undue hardship was "mere speculation."

Undue Hardship (Religion)

This term refers to the financial burden on the operations of the employer when arrangements are made to allow an employee to observe her religious beliefs and restrictions. When the financial burden becomes too much, the employer can refuse to provide or can discontinue such arrangements. Note that this is a different standard than used in disability accommodation situations.

From *Managing Today's Federal Employees*

ADR: Which Method Will Serve You Best?

What is alternative dispute resolution? Or better yet, what is it an “alternative” to? The short answer is a mess and an expensive one at that. A more formal answer is litigation. Litigation can take the form of a hearing before an administrative law judge, an arbitrator, or a federal judge. It can involve depositions, discovery, requests for admissions, testimony, exhibits, and legal beliefs.

While this is going on, the meter is running and not just for the lawyers—you’re losing productivity, morale is suffering, and a final outcome is being delayed.

What’s so great about ADR? Does it mean we agree to settle everything? No, we don’t settle everything. The decision to settle a particular case is a tactical one based on the specific facts of that dispute. But what ADR does is provide a framework for the parties to try to settle.

ADR is a collection of options selected by the parties which they agree to employ, either singly or in combination.

ADR includes other methods of dispute resolution such as:

- Conciliation is a trust-building process. The conciliator assists to establish communication, clarify misconceptions, promote openness, and break down barriers so parties can build trust and engage in cooperative problem-solving.
- Facilitation focuses more on the process of resolution rather than on the substance of the issue. It is used when the parties have a common goal and some mutual trust, and need procedural assistance from an outsider.
- Fact finding is a form of investigation by an impartial expert to establish the facts of a dispute. Fact finders do not resolve issues, but they may provide an evaluation and make recommendations if requested by the parties.
- Interest-based problem-solving or bargaining is used in collective bargaining in lieu of traditional, position-based bargaining. It attempts to define the problem, separates the person from the problem, identifies the issues, and explores possibilities and opportunities in an effort to reach a solution. The focus is on the problem, not on what each party wants.
- Mediation is by far the most common form of alternative dispute resolution. Mediation involves the use of a professionally trained neutral third party with no decision-making authority. A mediator meets with the parties to explore alternative resolutions and becomes a catalyst to enable the parties to arrive at their own effective resolution.
- Minutials are similar to real trials (or hearings) but with less stringent rules. A third party often heads the trial. Minutials help the parties form their case in summary format so that a settlement may be reached to head off formal litigation. They also sometimes highlight the weaknesses in one’s position that previously had not been evident.
- Nonbinding arbitration is a formal process in which material is presented to a neutral third party who issues an advisory decision, usually after a hearing.

From Managing Today’s Federal Employees

Keep Inappropriate Behavior Out of Your Organization

Sex discrimination is probably the type of discrimination that has earned the most attention, inside and outside of government. The media features high-profile cases, and we read about major court decisions. We could get the impression the sex discrimination is a normal part of employment.

The truth is very different, especially in the federal government. Federal managers regularly receive training in the prevention of sexual harassment and other forms of sex discrimination. The number of complaints has gone down considerably over the years, probably because attitudes toward women in the workforce and in positions of authority have changed and because most managers understand that sex discrimination is illegal, disruptive to the workplace, and bad for morale and productivity.

But since we are all human, discriminatory conduct may creep into the workplace in one way or another. It's your duty as a manager to first understand sex discrimination and then make sure there is no place in your unit for it or any inappropriate behavior. This more than a legal obligation – it's good management.

Disparate Treatment

Sex or gender discrimination can occur any time an employee or applicant is treated less favorably than employees of the opposite gender without a legitimate reason. This could mean being denied an employment opportunity such as a promotion, special training, or management opportunities.

Sex discrimination is sometimes called gender discrimination because it is based on whether employees are male or female and does not involve sexual behavior. Gender discrimination occurs when employment decisions – hiring, firing, promoting, training, or assigning – are made based on the gender of the employee.

When an employee is treated less favorably than another comparable employee of the other gender – because of the gender difference – this is known by EEO specialists as “disparate treatment.”

Gender discrimination most often occurs because managers and employees operate on deep-rooted feelings about the roles proper to men and women. Since these feelings are ingrained by upbringing and culture, managers sometimes have no idea they have discriminated until they are shocked by a complaint. It's better to examine our gender assumptions first and adjust our behavior before the complaint comes in.

Beware of discriminatory family obligation queries

Most instances of gender discrimination involve discrimination against women by men – typically supervisors and selecting managers. Many times they involve the obligations of family. While the federal government has become more aware of the challenges of balancing career and family, supervisors may not always recognize the discrimination issues that can arise as a result of family matters.

This may come up during interviews of job candidates. Consider these real-life examples from the federal government:

- A woman interviewed for the position of fire program clerk. The selecting manager asked her whether her husband would permit her to travel and whether she had or was planning to have any children. The manager asked the man who was eventually selected for the position only if he were available for travel. The manager showed no interest in the women's fire training experience and yet cited

the selectee's prior fire management experience as making him the best qualified. As a result of her complaint, the woman was eventually offered the position.

- The selecting manager questioned a woman candidate about her marital status and children, but did not question the man who was selected in the same manner. The manager's explanation that he was just trying to ease tension during the interview was not believed.

These two examples provide some practical guidance. When you interview any candidate, avoid questions about family status and obligations. A general question about willingness to travel or about the acceptability of certain work schedules is perfectly legitimate if you ask it of all candidates, but probing about family life is definitely out. It inevitably will create an impression of gender bias. "I was just trying to break the ice" is no excuse.

Stereotyping can skew your perception of sex discrimination

Commonly, sex discrimination cases involve female employees as the victims with male supervisors as the perpetrators. As such, it may be easy to assume that your actions don't rise to the level of sex discrimination since you and your employee don't fill those exact roles. Two things are wrong with this stereotypical assumption:

- Everyone has a gender, and everyone can be discriminated against because of it. Men can also be victims of sex discrimination.
- Although most instances of gender discrimination involve two parties of different genders, this is not always the case. Women are perfectly capable of discriminating against women, and men against men.

The best way to avoid claims of gender discrimination is to make sure your employment actions are fairly based on the merits of the individuals involved. Fair decisions, along with careful documentation, will help keep you out of EEO trouble.

From Managing Today's Federal Employees

Fair Treatment Begins and Ends with You

As a manager, you have great power when it comes to setting the tone of a workplace. If you make reasoned decisions and address conflicts fairly, you are much less likely to be the target of complaints and dissatisfaction among employees. Confidence in your ability to make the right decisions and stop inappropriate employee conduct can support harmony and a feeling of shared mission.

There are several steps you can take to foster a work environment characterized by fairness, respect, equal opportunity, and adherence to merit system principles.

Treat employees respectfully.

Managing a respectful workplace means that all of your communications are civil, different opinions are valued, and no individual or group is singled out with offensive jokes or treatment. But the foundation of a respectful workplace starts with the way you treat your employees. Treating them respectfully sends a powerful message because employees who know that you will hear and address their concerns will carry out their work without being distracted by worries of possible mistreatment. Your respectful treatment of employees also signals to would-be perpetrators that bullying and other types of harassment will not be tolerated.

Your employees look to you to provide an example of appropriate workplace conduct. Treating employees of all backgrounds with courtesy and respect encourages your workers to act in a like manner.

Recognize the value of employee work.

Recognizing the values of excellent employee performance allows you to reward the work done by employees and also encourage them to maintain high standards. The appreciation you show for a job well done will also encourage employees to maintain high standards of integrity, conduct, and concern for the public interest, as required by merit system principles.

Recognition and awards are a positive aspect of your duties as a manager. However, as in other areas, you must be careful to be fair in your distribution of praise and other incentives, keeping track of excellence at all types of jobs, not just those at the highest levels.

Keep in mind that recognition can include advancement. Providing advancement opportunities based on superior performance carries out the spirit of merit system principles as long as all qualified employees are allowed an equal chance to compete for those advancements.

Make fair decisions.

Making transparent and supported decisions gives employees confidence that you are acting according to merit principles, not playing favorites, or functioning with a discriminatory motive. Whether you are making a decision about a promotion, discipline for misconduct, or where to cut the budget, having a reputation for making well-considered decisions will encourage your employees to support you and accept that the actions you take are fair to all employees.

Explaining your decisions will add credibility to your fairness. When possible, briefly outline the reasons for a decision to help a disappointed employee understand why it was fair. For example, in the case of nonselection, you could outline the selectee's superior qualifications. This could help you show that your decision was based on merit. By doing so, you remove the likelihood that the disappointed employee will draw conclusions that cast you as having a discriminatory or unfair motive.

Making sure your employment-related decisions are fair means giving all who are eligible the opportunity to compete for positions, promotions, opportunities, and awards.

Address harassment or other employee conflict promptly.

Unchecked bullying and harassment in the workplace can distract not only the victim, but also the perpetrator and all the employees who witness the misconduct. Failing to promptly address the mistreatment of employees risks an escalation of the perpetrator's misconduct, invites complaints, and creates uncertainty regarding the fairness of the workplace. Over time, these outcomes erode the ability of all employees to carry out the mission of the agency.

However, if you have a reputation for addressing these types of incidents quickly and effectively, your employees won't have to waste time and energy worrying about their work environment.

Address other claims of discrimination.

Although claims of harassment or bullying are generally the most common complaints you address, you might also become involved in an employee claim of unfair treatment that is the product of unlawful discrimination – based on sex, color, race, national origin, religion, disability, age, genetic information, or prior EEO activity.

Making fair and transparent decisions can help stem EEO claims, but it won't necessarily stop them altogether. The most important thing to remember here is to keep your cool. Whether the employee simply mentions a concern about discrimination or files a formal complaint, remember EEO activity is protected, and you will only make things worse by reacting in a manner that discourages EEO activity. Although it's difficult not to take an EEO claim personally, you must carry on in a professional manner.

From Managing Today's Federal Employees

Your Response to Coworker Harassment May Limit Agency Liability

It's likely that you will mostly be called on to handle claims of harassment raised by employees against their coworkers. As with any claim of harassment, whether or not you think discrimination occurred, you should take four critical steps:

- **Listen.** Listen to the employee's claim.
- **Investigate.** Immediately conduct an investigation that is sufficient under the circumstances to determine whether the employee's claims could be true. Work with the EEO or HR Office on this.
- **Follow up.** Once you have responded to the initial complaint, check back promptly with the employees involved to make sure the situation is resolved. It may take more than one intervention to address the problem adequately. The EEO and HR Offices can provide support to you on this step.
- **Document.** Make a timely record of your discussions, your investigation, and the outcome of any action you took as a result of the complaint.

If an employee has been subjected to discriminatory harassment, your action will make all the difference in whether the agency will be found responsible for the harassment. If an immediate investigation is undertaken and any harassment is conclusively stopped, your agency generally will not be held liable.

On the other hand, if you know or should have known about coworker harassment but fail to take appropriate action, our agency could be held responsible for the harassment and any mental or physical harm the victim suffers as a result of the harassment. Here are some examples:

- An agency was found responsible for the harassing conduct of a coworker because it essentially ignored the victim's claims that the coworker was intimidating him with verbal abuse based on his national origin. Although the agency reassigned the offending coworker to another unit, it didn't take any further disciplinary actions when the coworker's misconduct continued.
- A female employee subjected a male employee to sexual harassment by making unwelcome vulgar comments, propositioning him, displaying sexually explicit material, and exposing herself during a three-month period. The employee reported the coworker's conduct to management but was forced to continue working in the same area with her. The agency's response, a verbal admonishment, didn't stop the harassment. Because the agency failed to immediately conduct an investigation and take the steps necessary to stop the coworker's harassment, it was responsible for the hostile work environment she created.
- An employee complained to supervisors about three coworkers who had pictures of scantily clad women in their offices. She was initially told to ignore the pictures even though they were in places she couldn't avoid. After one of the coworkers was told to remove the pictures, the employee began finding similar pictures on her desk and around her cubicle. Catalogs for undergarments and sex toys also appeared on her desk. A supervisor held a meeting to address the situation, but the incidents continued. Because her manager didn't take the actions necessary to stop the harassment, the agency was found responsible for creating a hostile work environment.
- Coworkers created a hostile work environment for an employee when they made numerous disparaging comments and otherwise ostracized him because of his disability. The agency could not avoid responsibility for the harassment because management clearly was aware of the coworker's inappropriate treatment but did nothing beyond distributing pamphlets about his medical condition.

An appropriate response

A response to harassment that is prompt and appropriate will depend on the facts of the case, the severity and persistence of the harassment, and whether your initial response proves effective.

Essentially, you and the agency are required to do whatever is necessary to stop harassing behavior and keep the harassment from recurring. In the case of persistent harassment, you may have to take stronger action against the perpetrators.

Perpetrators of harassment could be subject to:

- Oral or written warning or reprimand.
- Transfer or reassignment.
- Demotion.
- Reduction of wages.
- Suspension.
- Discharge.
- Training or counseling.
- Monitoring by supervisors to ensure the harassment stops.

Document your response to harassment

Recording your actions and the reasons for them will help establish that you took appropriate action and also provide support for any further disciplinary actions you may need to take.

If you need guidance with regard to appropriate discipline for discriminatory harassment, check with your chain of command or your HR office.

It's crucial to keep in mind that you cannot penalize employees for reporting that they are the victims of discriminatory harassment. Don't force the employee to take an unwanted reassignment or move to an undesirable location in order to separate him from the harasser. If a separation is needed, the employee accused of harassment must be the one who moves or is reassigned unless the employee who raised the claim volunteers to make a change.

From Managing Today's Federal Employees

A Baker's Dozen of Don'ts

Prohibited personnel practices are defined by law and provide that managers **shall not**:

1. Discriminate on the basis of race, color, religion, sex, national origin, age, disability, marital status, or political affiliation.
2. Solicit or consider any personnel recommendation that is not based on a personal knowledge or records of job-related factors such as performance, ability, aptitude, general qualifications, character, loyalty, or suitability.
3. Coerce an employee to perform or support political activity.
4. Deceive or deliberately obstruct any person who is attempting to compete for employment.
5. Influence or attempt to influence any person to withdraw from competition for the purpose of improving or injuring the prospects of another person for employment.
6. Grant any preference or advantage not authorized by law, regulation, or rule to any employee or applicant to improve or injure the prospects of another applicant.
7. Hire, promote, or influence the hiring or promotion of a relative.
8. Retaliate against an employee for whistleblowing activity.
9. Retaliate against employees or applicants for exercising their appeal rights, for testifying or cooperating with an inspector general or the Office of Special Counsel, or for refusing to comply with an instruction that would require the employee to break the law.
10. Discriminate based on personal conduct or actions that do not adversely affect an employee's or applicant's job performance.
11. Violate any law, rule, or regulation implementing or directly concerning the merit principles.
12. Violate veteran's preference by taking or failing to take a personnel action.
13. Use nondisclosure agreements to curtail whistleblower rights of employees.

From Managing Today's Federal Employees

Telework Talk

The 2010 Telework Enhancement Act is changing the workplace landscape. As government agencies establish policies for working outside the office, many employees are no longer bound to the standard 40-hour work week under the same roof as their manager.

This has its advantages. Telework can improve work-life balance, reduce the need for office space and real estate costs, curb absenteeism, and enhance recruitment and retention. Still, many managers are uncomfortable with this new office culture and worry about productivity. Efforts to manage teleworkers often have not met with great success. The Office of Personnel Management's 2011 Federal Employee Viewpoint Survey found that among 266,000 respondents only 38 percent said they were satisfied with their agency's telework program.

There is a happy middle, however, for teleworkers and their bosses. Here are five tips that can take the tension out of teleworking.

Cover the Basics

Managers and employees both should know the parameters for working off-site – such as who has authority to approve telework and which employees are eligible – and sign agreements. Review agency policies, including terms and conditions, remote transmission of classified and sensitive information, reporting requirements and employee rights. Teleworkers should know what to do in case of emergency and be aware that they may temporarily have expanded roles and responsibilities if their coworkers can't get into the office. Telework training for employees and managers is available at Telework.gov, an interagency website hosted by OPM and the General Services Administration.

Embrace Technology

Inadequate resources, inferior hardware and software, or lack of technological know-how can torpedo a teleworking arrangement. Managers should have an inventory of their agency's information technology assets, as well as access to IT staff support. At a minimum, working remotely requires a computer, peripheral equipment such as a printer, copier, scanner, fax machine, telephone, Internet connectivity, secure network access and tech support, according to technology services provider Verizon Wireless.

GSA has established guidelines for the equipment and support agencies should provide teleworkers. In addition, managers should be well-acquainted with a variety of communication tools, including instant chat, texting, Twitter, email, message boards, social media, and Skype or Google+. Videoconferencing is ideal because it enhances communication and fosters collaboration between remote workers and the office. If it's not already in place, managers should push for high-quality video capabilities and the bandwidth to support it.

Check in Regularly

Regular communication ensures everyone is in sync and teleworkers feel connected to their colleagues and agency projects. Frequent check-ins are crucial. Asking questions is a powerful, and often overlooked, communications tool. Managers can use the answers to organize assignments, adjust workflow, and troubleshoot potential problems.

Make sure on-site employees are communicating effectively with teleworking colleagues. The Veterans Affairs Department, for example, has developed a Microsoft SharePoint website so managers

and employees can easily access forms, documentation and updates. In addition, managers should schedule meeting with teleworkers to review any issues related to the telecommuting arrangement.

Track Performance

No one is sure who said it first, but everyone agrees that what gets measured gets managed. Establish key performance indicators to gauge relevant outputs, service levels, outcomes of program activity and deadlines. Performance standards for off-site employees should be the same as those for on-site employees, according to the Merit Systems Protection Board. The board also recommends that managers give comparable assignments and maintain similar expectations for teleworkers and on-site employees.

Address Problems Immediately

Telework can shine a light on organizational weaknesses that should be addressed. Small issues can snowball and trigger big problems, so, managers should be proactive and identify problems, show concern, and be specific and direct with solutions, Telework.gov advises. Provide clear instructions and deadlines, interim updates and regular feedback. Be prepared to enforce and reinforce telework policy to all direct reports. In addition, managers should be able to turn to a guideline in the policy or procedures manual to back up their actions. If a situation escalates, then this may be the time for a face-to-face meeting.

By Jean Fogarty in Government Executive

Management Directive-715: Our EEO Program Annual Status Report

The Equal Employment Opportunity Commission (EEOC) MD-715 report provides standards for establishing and maintaining an effective affirmative program for equal opportunity.

This EEOC reporting mechanism requires our agency to take appropriate steps to ensure all employment decisions are free of discrimination. It also sets the standards by which EEOC will review the sufficiency of the program with periodic self assessments and the removal of barriers to free and open workplace competition.

EEOC has defined six elements to serve as a foundation upon which each agency should build their program. We are required to review our EEO and personnel programs, policies and performance standards against all elements to identify where programs can be more effective. The essential elements of a model EEO program are:

A. Demonstrated commitment from agency leadership

Objective: Directors issue written policy statements ensuring a workplace free of discriminatory harassment and a commitment to equal employment opportunity. Managers participate in EEO programs. Supervisors are to be evaluated on their ability to hire a diverse workforce.

B. Integration of EEO into the agency's strategic mission

Objective: EEO Programs are organized and structured to maintain a workplace that is free from discrimination in any of the agency's policies, procedures or practices and supports the agency's strategic mission. EEO professionals are involved in all major human resources decisions and have sufficient resources to conduct the type of monitoring, recordkeeping and analysis needed to develop effective EEO strategies.

C. Management and program accountability

Objective: All managers, supervisors and EEO officials are responsible for the effective implementation of the agency's EEO program and plan. EEO Offices must be proactive. Instead of waiting for problems to arise, conduct regular internal EEO program audits to identify problems before they occur. Managers and supervisors are evaluated on their efforts to ensure equality of employment opportunity.

D. Proactive prevention of unlawful discrimination

Objective: Early efforts are made to prevent discriminatory actions, eliminate barriers to equal employment opportunity by equal access to promotions, awards, and career development opportunities.

E. Efficiency

Objective: Ensure that there are effective systems in place for evaluating the impact effectiveness of EEO programs as well as an efficient and fair dispute resolution process. Establish procedures for capturing applicant flow.

F. Responsiveness and legal compliance

Objective: The organization is in full compliance with EEO statutes and EEOC regulations, policy guidance and other written instructions. When a self-assessment that covers the essential elements is completed, action items are created to help ensure a model program.

Bureau of Land Management	
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EXECUTIVE SUMMARY

Scope of work and budget:

The Bureau of Land Management (BLM or Bureau) manages more land – 245 million surface acres – than any other Federal agency. This land, known as the National System of Public Lands, is primarily located in 12 Western States, including Alaska. The Bureau, with a budget of about \$1 billion, also administers 700 million acres of sub-surface mineral estate throughout the nation. The Fire and Aviation Directorate is a component of the BLM.

Description of Mission:

The BLM’s multiple-use mission is to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations. The Bureau accomplishes this by managing such activities as outdoor recreation, livestock grazing, mineral development, and energy production, and by conserving natural, historical, cultural, and other resources on public lands. In support, the BLM establishes and monitors employment policies, procedures, and practices that support diversity, equal opportunity, and a discrimination-free workplace. In support of the overall mission of the BLM, the Fire and Aviation Directorate develops policies and sets standards for firefighting safety and training and for prevention, suppression, and use of wildfires on BLM lands.

Workforce Numbers:

As of September 30, 2013, the Fire and Aviation workforce included 268 permanent employees and 14 temporary employees for a total of 282. This summary will focus on the permanent workforce. This permanent workforce consisted of 1 Senior Executive Service (SES), 239 General Schedule (GS) and 28 Wage Grade (WG, WL, and WS) employees.

Description of Demographic Changes:

In FY 2013, BLM Fire and Aviation Directorate permanent workforce decreased by 22 positions from 290 employees in FY 2012 to 268 employees.

The permanent workforce consisted of 20.9% women, 10.8% minorities, and 10.6% employees with a disability. Employees with a targeted disability made up 0.4% of the permanent workforce. Number of employees with a reportable disability decreased from 28 (7.8%) in FY 2012 to 24 (6.7%) in FY 2013.

Total minorities decreased by 4 positions to 29, representing 10.8% of the total permanent workforce, a decrease from 11.4% in FY 2012. Hispanic men decreased by 2 positions (-0.4%). Hispanic women decreased by 4 positions (-1.3%). Black men increased by 1 position (0.4%). American Indian/Alaska Native men increased by 1 position (0.4%). White men decreased by 8 positions (2.5%). White women decreased by 10 positions (-2.0%).

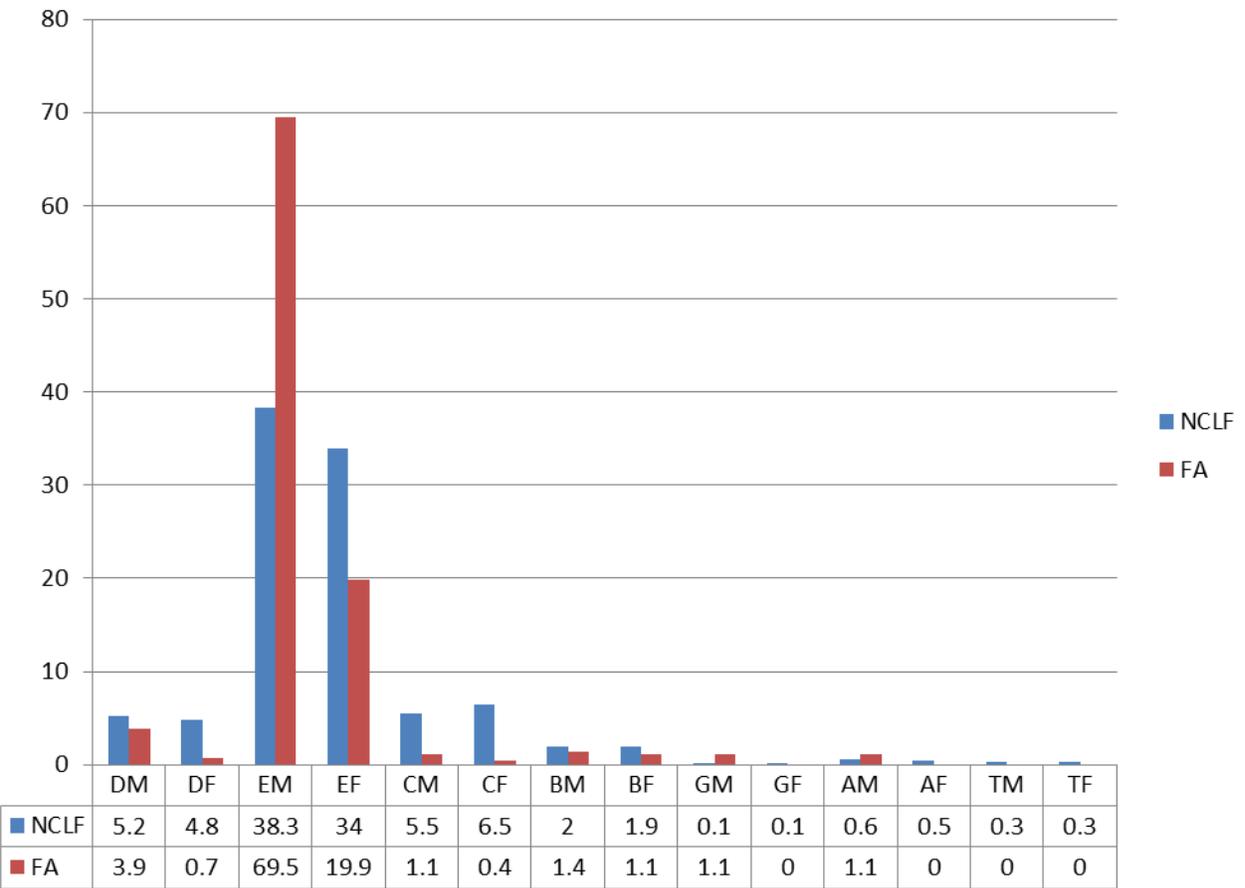
The Graph below compares BLM with NCLF from FY12 to FY13:

Race/Ethnicity/Gender	FY 2012		FY 2013		Ratio Change	Civilian Labor Force Percent
	Number	Percent	Number	Percent		
Female	70	24.1	56	20.9	-3.2%	48.1
Hispanic Male	13	4.5	11	4.1	-0.3%	5.2
Hispanic Female	5	1.7	1	0.4	-1.4%	4.8
White Male	196	67.6	188	70.1	2.6%	38.3
White Female	61	21.0	51	19.0	-2.0%	34.0
Black Male	2	0.7	3	1.1	0.4%	5.5
Black Female	1	0.3	1	0.4	0.1%	6.5
Asian American Male	4	1.4	4	1.5	0.1%	2.0
Asian American Female	3	1.0	3	1.1	0.1%	1.9
Hawaiian or Other Pacific Male	3	1.0	3	1.1	0.1%	0.1
Hawaiian or Other Pacific Female	0	0.0	0	0.0	0.0%	0.1
Am. Indian/Alaska Native Male	2	0.7	3	1.1	0.4%	0.6
Am. Indian/Alaska Native Female	0	0.0	0	0.0	0.0%	0.5
Two or More Races Male	0	0.0	0	0.0	0.0%	0.3
Two or More Races Female	0	0.0	0	0.0	0.0%	0.3
Minorities	33	11.4	29	10.8	0.6	27.8
Total	290		268		-	-

Grade Analysis
Participation Rates for General Schedule (GS) Grades –Permanent Workforce

GS	Total Employees		Race/Ethnicity													
			Hispanic or Latino		Non-Hispanic											
					White		Black or African American		Asian		Hawaiian or other Pacific Islander		American Indian or Alaska Native		Two or more races	
male	female	male	female	male	female	male	female	male	female	male	female	male	female	male	female	
1-6	16	1	1		13	1	1		1							
7-11	94	27	2		85	26	1		3	1	1			2		
12-13	58	22	6	1	50	18		1		2	2					
14-15	17	4	1		16	4										
SES	1				1											
Total	186	54	10	1	165	49	2	1	4	3	3		2			
Group Total	240		11		214		3		7		3		2			

In addition, there are **28** employees in wage grade, wage leader, and wage supervisor positions, including one Hispanic man, one Black man, one American Indian/Alaska Native man, two White women, and 23 White men.



Race/Ethnicity/Gender Designation:

- DM/DF Hispanic Male/Female
- EM/EF White Male/Female
- CM/CF African American Male/Female
- BM/BF Asian Male/Female
- AM/AF American Indian/Alaskan Native Male/Female
- GM/GF Native Hawaiian/Other Pacific Island Male/Female
- TM/TF Two or More Races Male/Female

Complaint Activity

Activity Summary for 10/01/2012 to 09/30/2013

Complaint Type	Count	Average Age of Case
Formal	0	0 days
Informal	1	28 Days

The FY 2013 Self-Assessment Checklist measuring Essential Elements of a Model EEO Program, 715-01 Part G indicated success in the Fire and Aviation Directorate's continuing to meet compliance measures within the Essential Elements. The compliance measures are summarized below.

Element A: Demonstrated Commitment from Agency Leadership

- The Assistant Director continues to serve as a Diversity Change Agent and role model for peers and employees through continued support of the Department's program.
- Assistant Director, Fire and Aviation, issued an annual EEO policy statement and discussed the policy during all-employee meetings. In addition, he and the EEO Manager met with individual groups throughout the year and discussed his expectations of employees concerning work environment and EEO issues.
- New employees are provided with a briefing package that includes EEO policy statements and other information on the EEO program. New supervisors and managers get an additional briefing package that includes the current MD-715 report summary and other information related to the EEO supervisory issues.

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

- During a Senior Management Team meeting, the EEO Manager informed leadership of the status of EEO programs and discuss strategic planning and future outreach opportunities.
- The principal EEO Official briefed managers on Fire and Aviation's accomplishments in each of the six elements of the Model EEO Program.
- EEO Program officials participate in discussions with managers and supervisors about recruitment strategies, vacancy projections, succession planning, training and career development opportunities.
- The Fire and Aviation Directorate uses a Personnel Management Committee to review recruitment, vacancy projects and succession planning issues. The EEO Manager is a member of this committee.
- Fire and Aviation Directorate's EEO Program received sufficient funding to implement EEO action plans and improve EEO program efficiency.

Element C: Management and Program Accountability

- The Fire and Aviation Directorate provided guidance, funding and support for the establishment of 5 Veteran's wildland fire suppression crews and 3 Veteran's fuels reduction crews. These crews provide returning veterans meaningful and important work, the opportunity to gain additional skills, and an appreciation of BLM's mission. In turn, highly trained, experienced, and motivated applicants provide a pool for succession needs including specialty skills and increased diversity within the BLM. BLM is the sole DOI agency to support and sponsor these types of crews.
- The Fire and Aviation Directorate continues to support veteran's hiring initiatives. Most notable are the following activities:
 - 13% of the total hires during FY 2013 are veterans.
 - Staff members have participated in the development of the BLM Veteran's Initiative Action Plan.
 - The Fire and Aviation Directorate is working closely with the Department of Veterans Affairs to explore opportunities for on-the-job training programs for fire and aviation occupations through the Post 9/11 GI Bill.
 - The EEO Office maintains contact with the Boise State University College Assistant Migrant Program (CAMP) Career Counselor as a community outreach resource to recruit summer hires, entry level and student positions.

- In FY2012, the Fire and Aviation Directorate recruited 10 students. At the end of FY2013, 3 of the 10 students were still employed at NIFC, including one student recruited through ongoing contacts with the College Assistance Migrant Program (CAMP).
- EEO and Human Resources Manager coordinated consultation duties to help ensure the Department of the Interior's Medical Standards Program for Fire was redesigned to meet reasonable accommodation standards.
- The EEO and Human Resources Manager meet on a regular basis to coordinate policies, practices and procedures.
- The Aviation Division has established the Aviation Leadership Development Initiative, a 2-year-long mentoring program designed to allow current or potential field BLM aviation managers to apply through a competitive process to attend industry-recognized certificate programs. There were 2 employees in the program in FY2011-2013, including 1 White woman.

Element D: Proactive Prevention

- The *Do What's Right* training material was revamped with new and re-edited material. This program has been used successfully since 2004 and focuses on preventing workplace behaviors that can detract from leadership and professionalism while building on behaviors that hold the values of duty, integrity, and respect. A total of 36 scenarios cover the areas of inclusion and respect, discrimination and harassment, public perception, fitness for duty, social media, and ethical behavior, integrity and policies. This highly successful training program has been adopted for use by other DOI bureaus as well as the USDA Forest Service. More than 90% of the participants have stated that the training helps change behaviors. The program was featured in the BLM Daily and OneInterior prior to its March 13 release to the field. In addition, a workshop featuring *Do What's Right* materials was held during the DOI Multi Cultural Day.
- In an evaluation conducted of the *Do What's Right* training, 93% of the employees surveyed believe the *Do What's Right* training is effective in changing behaviors and informing employees of their rights and responsibilities. Of the leadership that responded, 83% think the training has a positive impact on the behavior of people under their supervision. More than 90% of the facilitators surveyed believe the training is effective and the materials provided are useful.
- 100% of Fire and Aviation Directorate employees met the Department of the Interior's requirement for EEO and diversity training, as detailed in a memorandum from Secretary Salazar in January, 2010. Innovative approaches to training, included *Hispanics and the Civil War: From Battlefield to Homefront* online self-study and showing of the following documentaries: *Apache 8* about an all-women fire-fighting crew from the White Mountain Apache Tribe; *Freedom Riders* about the Civil Rights movement; *The Forgotten Grave* about women in the Civil War; and *Honor Bound* about Japanese-American soldiers in WWII. These approaches have continued to increase participation and interest and improve the understanding of diversity by employees. The use of the cable TV system at NIFC to telecast these documentaries also increased participation and resulted in a cost of about \$1.25 per person to provide diversity training. 98% of Fire and Aviation employees exceeded the annual training requirement in FY2013.
- EEO and Human Resources Manager meet with the DOI Solicitors on a regular basis to discuss issues.
- In FY2013, NIFC on-campus physical improvements to increase accessibility costing \$10,700 included the following: 1) installation of 5 accessible water fountains; 2) installation of 5 accessible lever door handles; 3) Installation of a widened sidewalk and accessible handrail at the Firefighter Monument site; 4) Installation of a widened door with an accessible handle in the Equipment Shop; and 5) Installation of additional accessible interior signage.
- In FY2013, Fire and Aviation competed for and received FY2014 Accessibility Corrective Action funds of \$15,000 for maintenance projects. We received these funds in part as recognition of our proactive efforts in accessibility.

Element E: Efficiency

- EEO and Human Resources Managers coordinated consultation duties to help ensure the Department of Interior’s Medical Standards Program for Fire was redesigned to meet reasonable accommodation standards.
- EEO staff members have met all the training requirements.
- EEO staff members continue to use the DOI complaints tracking system.

Element F: Responsiveness and Compliance

The Office of Civil Rights and the Fire and Aviation EEO Office processed EEO complaints in accordance with 29 C.F.R. 1614. Complaints were investigated, Final Agency Decisions and Final Orders were prepared and issued and the terms of all Settlement Agreements were monitored and strictly enforced.

Additional accomplishments that showcase the agency’s commitment to a model EEO Program include:

- Human Resources representatives are part of the DOI Veterans 2 Wildland Fire team. This team has been tasked to develop a roadmap to assist veterans in finding wildland fire positions.
- In FY 2013, several Fire and Aviation employees were chosen for developmental details and temporary promotions. Fourteen employees, including 5 White women and 2 Hispanic men were temporarily promoted. There were 20 details; those chosen included 5 White women and one American Indian/Alaska Native man. Fire and Aviation afforded detail and temporary promotion opportunities outside our organization to 14 employees, including 6 White women.
- Mentoring: Fire and Aviation continues to use the Fire and Aviation Mentoring web-based platform, which connects hundreds of learners and advisors from the National Park Service, BLM and US Fish and Wildlife Service with each other and gives them the opportunity to share knowledge, expertise, values, skills and perspectives. Guidance from experienced leaders can help a firefighter handle a tough leadership issue, solve a complex problem, or navigate a career path. The AD, Fire and Aviation affirmed the organization’s support of the program by issuing Information Bulletin No. FA IB-2012-017. The platform is located at: <https://fam.openmentoring.com/>
- Leadership: BLM supports the NWCG Leadership curriculum. Fire and Aviation employees regularly attend leadership courses designed for the full spectrum of employees, from entry-level firefighter to the Incident Commander and organization/program leader. More information on the NWCG Fire Leadership curriculum is available at: www.fireleadership.gov
- Special Observances in FY2013 included the following:
 - Hispanic Heritage Month: Starting October 2 offered *Hispanics and the Civil War: From the Battlefield to the Homefront* online; participation counted as a 2-hour diversity self-study course. Displayed posters.
 - Disability Employment Awareness Month: Emailed link to CAP online training module, *Increasing Federal Employment of People with Disabilities*, and other information. Displayed posters with 2013 theme throughout October.
 - American Indian Month: On November 13 presented the documentary, *Apache 8*, with an introduction by BIA Fire staff; attendance counted as 2 hours of diversity training. Displayed posters

- African American History Month: On February 21, presented the documentary, *Freedom Riders*; attendance counted as 2 hours of diversity training. Displayed posters.
 - Women's History Month: On March 28, presented the documentary, *The Forgotten Grave*; attendance counted as 2 hours of diversity training. Displayed posters.
 - Asian American Pacific Islander Month: On May 29, presented the documentary, *Honor Bound*; attendance counted as 2 hours of diversity training. Displayed posters
 - Women's Equality Day: Displayed posters
- In FY 2013, the Joint Fire Science Program (JFSP) continued to actively notify thousands of potential proposers of the program's annual research solicitation including both tribal nations and HBCUs of funding opportunities.
 - JFSP continues to promote Graduate Student Innovation Awards (GRIN) as a way to support student seeking careers in wildland fire management. These awards of \$25,000 support additional research and study.
 - Through the Association for Fire Ecology, the JFSP provided student Travel, Research, Education Experience (TREE) grants that enable students to make presentations at scientific conferences or work with other researchers at their labs.

Fire and Aviation Action Items for FY 2014

- A presentation on outreach best practices for the BLM Fire Leadership Team in FY2014. A first goal is “a diverse, highly effective and motivated workforce.”
- A SharePoint site will be established in FY2014 to share EEO information with employees. It will be a one-stop place to find out EEO processes, training and other pertinent information. The SharePoint site will be an efficient and effective means to provide up-to-date orientation materials to new employees, who now get the material in a paper version.
- A memorandum describing EEO and diversity training requirements and options for accomplishing training will be distributed during the 1st quarter of FY 2014.
- A presentation on outreach and recruitment will be given during the Fall Fire Leadership Team meeting with a goal of creating awareness on the need for better outreach.
- A summit will be held during Spring of FY 2014 to train supervisors and managers in EEO issues and also build their skills in the management and inclusion of employees in the workplace.
- Fire and Aviation will create a group to look at Interagency Fire Program Management (IFPM) qualification requirements that may be limiting career advancement for employees

BLM (State/Center) as of October 1, 2012 – September 30, 2013
Table A1: TOTAL WORKFORCE - Distribution by Race/Ethnicity and Sex

Employment Tenure	TOTAL WORKFORCE			RACE/ETHNICITY														
				Hispanic or Latino		Non-Hispanic												
						White		Black or African American		Asian		Native Hawaiian or Other Pacific Islander		American Indian or Alaska Native		Two or more races		
						Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male
All	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female		
Total Workforce																		
Prior FY (2012)	#	309	231	78	13	6	206	67	2	1	4	4	4		2			
	%	100	74.8	25.2	4.2	1.9	66.7	21.7	0.6	0.3	1.3	1.3	1.3	0.0	0.6	0.0	0.0	0.0
Current FY (2013)	#	282	220	62	11	2	196	56	3	1	4	3	3		3			
	%	100	78.0	22.0	3.9	0.7	69.5	19.9	1.1	0.4	1.4	1.1	1.1	0.0	1.1	0.0	0.0	0.0
All Occupations CLF	%	100	51.9	48.1	5.2	4.8	38.3	34.0	5.5	6.5	2.0	1.9	0.1	0.1	0.6	0.5	0.3	0.3
Organizational CLF	%	100	55.4	44.6	4.5	4.1	41.3	31.5	5.3	5.2	3.1	3.0	0.1	0.1	0.7	0.5	0.3	0.3
Difference	#	-27	-11	-16	-2	-4	-10	-11	1	0	0	-1	-1	0	1	0	0	0
Ratio Change	%	-	3.3	-3.3	-0.3	-1.2	2.8	-1.8	0.4	0.0	0.1	-0.2	-0.2	0.0	0.4	0.0	0.0	0.0
Net Change	%	-8.7	-4.8	-20.5	-15.4	-66.7	-4.9	-16.4	50.0	0.0	0.0	-25.0	-25.0	-	50.0	-	-	-
Permanent Workforce																		
Prior FY	#	290	220	70	13	5	196	61	2	1	4	3	3		2			
	%	100	75.9	24.1	4.5	1.7	67.6	21.0	0.7	0.3	1.4	1.0	1.0	0.0	0.7	0.0	0.0	0.0
Current FY	#	268	212	56	11	1	188	51	3	1	4	3	3		3			
	%	100	79.1	20.9	4.1	0.4	70.1	19.0	1.1	0.4	1.5	1.1	1.1	0.0	1.1	0.0	0.0	0.0
Difference	#	-22	-8	-14	-2	-4	-8	-10	1	0	0	0	0	0	1	0	0	0
Ratio Change	%	-	3.2	-3.2	-0.4	-1.4	2.6	-2.0	0.4	0.0	0.1	0.1	0.1	0.0	0.4	0.0	0.0	0.0
Net Change	%	-7.6	-3.6	-20.0	-15.4	-80.0	-4.1	-16.4	50.0	0.0	0.0	0.0	0.0	-	50.0	-	-	-
Temporary Workforce																		
Prior FY	#	19	11	8		1	10	6				1	1					
	%	100	57.9	42.1	0.0	5.3	52.6	31.6	0.0	0.0	0.0	5.3	5.3	0.0	0.0	0.0	0.0	0.0
Current FY	#	14	8	6		1	8	5										
	%	100	57.1	42.9	0.0	7.1	57.1	35.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Difference	#	-5	-3	-2	0	0	-2	-1	0	0	0	-1	-1	0	0	0	0	0
Ratio Change	%	-	-0.8	0.8	0.0	1.9	4.5	4.1	0.0	0.0	0.0	-5.3	-5.3	0.0	0.0	0.0	0.0	0.0
Net Change	%	-26.3	-27.3	-25.0	-	0.0	-20.0	-16.7	-	-	-	-100	-100	-	-	-	-	-

BLM (State/Center) as of October 1, 2012 – September 30, 2013

Table B1: TOTAL WORKFORCE - Distribution by Disability

Employment Tenure	Total	Total by Disability Status					Detail for Targeted Disabilities								
		(04, 05) No Disability	(01) Not Identified	(06-94) Disability	Targeted Disability	(16, 17) Deafness	(23, 25) Blindness	(28, 32-38) Missing Limbs	(64-68) Partial Paralysis	(71-78) Total Paralysis	(82) Convulsive Disorder	(90) Mental Retardation	(91) Mental Illness	(92) Distortion Limb/Spine	
Total Workforce															
Prior FY	#	309	275	10	24	1			1						
	%	100%	89.0%	3.2%	7.8%	0.3%	0.0%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Current FY	#	282	252	11	19	1			1						
	%	100%	89.4%	3.9%	6.7%	0.4%	0.0%	0.0%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Federal High	%					2.0%									
Difference	#	-27	-23	1	-5	0	0	0	0	0	0	0	0	0	0
Ratio Change	%	-	0.4%	0.7%	-1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Net Change	%	-8.7%	-8.4%	10.0%	-20.8%	0.0%	-	-	0.0%	-	-	-	-	-	-
Permanent Workforce															
Prior FY	#	290	257	9	24	1			1						
	%	100%	88.6%	3.1%	8.3%	0.3%	0.0%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Current FY	#	268	239	10	19	1			1						
	%	100%	89.2%	3.7%	7.1%	0.4%	0.0%	0.0%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Difference	#	-22	-18	1	-5	0	0	0	0	0	0	0	0	0	0
Ratio Change	%	-	0.6%	0.6%	-1.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Net Change	%	-7.6%	-7.0%	11.1%	-20.8%	0.0%	-	-	0.0%	-	-	-	-	-	-
Temporary Workforce															
Prior FY	#	19	18	1											
	%	100%	94.7%	5.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Current FY	#	14	13	1											
	%	100%	92.9%	7.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Difference	#	-5	-5	0	0	0	0	0	0	0	0	0	0	0	0
Ratio Change	%	-	-1.9%	1.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Net Change	%	-26.3%	-27.8%	0.0%	-	-	-	-	-	-	-	-	-	-	-