

Affirmative Employment Program (AEP) Office

Functional Responsibilities/Program Purpose:

The AEP is a program of positive action in all personnel administration and management matters, including recruitment, employment, and promotion, designed to promote equal opportunity and to identify and eliminate discriminatory practices and policies. The Air Force is legally required to take proactive steps to ensure EEO for all employees and applicants for employment by regularly evaluating employment practices to identify and eliminate barriers that hamper the advancement of any individual on the basis of race, color, religion, sex (including pregnancy, gender identity and sexual orientation), national origin, age, disability, genetic information, or reprisal. The Air Force is also legally required to provide reasonable accommodation to qualified individuals with disabilities who are employees or applicants for employment, unless to do so would cause undue hardship. The SEP are designed to enhance the employment and advancement opportunities of all EEO groups.

Installation Commander:

The installation commander is defined as the commander or other official exercising delegated appointing authority over military and civilian personnel under his or her command or direction. This Installation Commander has overall program responsibility for the AEP and the SEPs for all assigned, serviced and tenant organizations.

- *For more information, view:*
 - Equal Employment Opportunity (EEO) and Non-Discrimination Policy Memorandum (16 Aug 19)
 - 88 ABW EOT Policy 2018 Sherman

Supervisors and Managers:

Managers and supervisors at all organizational levels (HQ, MAJCOM, AFPC, and installation) will:

- Ensure that all employees and applicants for employment are treated in a manner free of discrimination in all aspects of the employment relationship.
- Consider the use of the noncompetitive Schedule A, 5 CFR 213.3102(u) appointing authority to hire individuals with severe physical disabilities, intellectual and psychiatric disabilities, and use the Noncompetitive Appointment of 30% or More Compensable Veteran's to hire qualified compensable veterans as appropriate.
- Maintain awareness of and comply with the intent and requirements of the AF AEP, as well as the respective installation level AEP goals and objectives.
- Ensure that EEO principles are considered in employment decisions such as promotions, reassignments, training, awards, and other personnel management actions
- Encourage employees to serve as collateral duty SEPMS
- Support and participate in community activities, meetings, workshops, conferences, and job fairs that emphasize the employment of all EEO groups, to the extent possible/practical.

- Integrate and evaluate processes to ensure fair and equitable treatment of personnel in organization operations and strategic plans.
- Circulate appropriate policy statements regarding the AEP and SEP.

Responsibilities of the Installation Affirmative Employment Program Manager:

- Develop procedures, implement, and manage the installation's AEP and the six SEPs identified in Chapter 3. Provide program management for special observances. The installation AEPM will work with appropriate offices, including the CPS and NAF-HRS, the EO Office, and the Integrated Delivery System (IDS) to advise the commander, managers, and supervisors on the proactive steps being taken to ensure EEO for all employees and applicants for employment, by regularly evaluating employment practices to identify and eliminate barriers that hamper the advancement of any individual on the basis of race, color, religion, sex (including pregnancy), national origin, age, disability, genetic information, or reprisal as appropriate.
- *For more information, view:*
 - AEP Reference Guide

Special Emphasis Programs (SEPS):

- AFI 36-205, authorizes the establishment of the following six SEPs: Federal Women's Program (FWP), Hispanic Employment Program (HEP), Individuals with Disabilities (IwDs), Black Employment Program (BEP), Asian American/Pacific Islander Employment Program (AAEP), and the American Indian/Alaska Native Employment Program (AIEP). Although the outreach and recruitment mechanisms for achieving SEP objectives are primarily within the civilian personnel function, the responsibility for accomplishment of program objectives will rest with Air Force management.

Appointing the Installation Special Emphasis Program Managers (SEPM):

- SEPMs are designated to enhance employment and advancement opportunities for specific EEO group members; therefore, they can and should play an important role in AEP and EO efforts. The appointment of the SEPM is vital to the success of the program and should be accomplished based on appropriate criteria related to the performance of the duties. Employees may be the SEPM for any group for which they meet the requirements and possess the necessary knowledge, skills and abilities as outlined below. It is not a requirement to belong to the SEP group one represents (i.e. an employee does not have to have a disability to be the DPM) nor be assigned to Civilian Personnel.
- **Federal Women's Program**
- **Hispanic Employment Program**
- **Disability Program Manager**

- **Black Employment Program**
- **Asian American/Pacific Islander Employment Program**
- **American Indian/Alaska Native Employment Program**

SEPM Responsibilities:

In full collaboration with the AEPM, assist in the development of affirmative employment initiatives, in conjunction with SEP initiatives, e.g., outreach and/or recruitment plans and retention initiatives.

Annually, obtain demographic data tables from AFPC Equal Opportunity, by using Business Objects, or working with CPS or other offices. In collaboration with the AEPM, analyze the statistical data on the composition of the entire civilian workforce, Appropriated Fund (APF) and NAF by organization, occupational categories, grade, or grade level groupings, disability, sex, national origin, and race in order to identify trends, triggers or a combination of factors that adversely affect employment opportunities.

Stay abreast of career information and promote participation in management, leadership, career development and mentoring programs to maximize opportunities.

Emphasize career enhancing opportunities such as details, developmental assignments and cross training.

Participate in outreach and recruiting activities and market career employment opportunities in the community to the extent possible.

Participate in and support community relations activities, meetings, national conferences, and job fairs relevant to your respective EEO group, to the extent possible and practical.

Strive to achieve one best practice per year and submit the best practice to the AEPM for use in installation and/or Air Force AEP reports.

Prepare and present briefings/presentations on specific issues and/or initiatives related to all EEO groups as needed.

Serve as a member of the IBAWG and other committees as appropriate and necessary.

Publicize accomplishments or information regarding the particular SEP objectives through various types of media and following public affairs requirements.

Participate in an annual training class, program, or conference related to your respective SEP.

Prepare an after action report on training or conference participation and provide to the AEPM and installation commander.

Develop and conduct installation training and/or share the training or conference information with other SEPMs, SEP committee members, and interested installation personnel.

Establish a SEP Committee, serving as Chair or technical advisor to the Committee

Serve as an ad hoc committee member or advisor to special observance committees.

Additional Responsibilities. In addition to the responsibilities listed above, full time SEPMs should also be responsible for the following regarding their respective SEPs:

Participate in the development of the AEP budget to ensure consideration of the SEP objectives.

Assist in identifying sources likely to provide qualified applicants.

In full coordination with the CPS, NAF-HRS, or AFPC:

Assist in efforts to attract and recruit qualified EEO groups to apply for the Air Force intern programs, e.g., PALACE Acquire and COPPER CAP intern programs and Pathways. (Note: These programs are centrally managed by AFPC/DP3D).

Initiate dialogue and establish working relationships with colleges and universities that have a diverse enrollment including students with disabilities.

Contacts should include placement directors, faculty members, and student organizations on campus, particularly those colleges and universities that graduate individuals with degrees that meet Air Force, installation or job needs.

Monitor and evaluate the effectiveness of the particular SEP on a regular basis. Provide information and/or feedback as requested or required by higher echelons.

Represent the commander at local and national meetings and conferences that are beneficial to the Air Force and support the AF EO and AEP policies and local AEPP, to the extent possible and practical.

SEP Committees:

Each designated SEPM will establish a committee to assist and support the individual SEPM

- Federal Women's Program Committee.
- Hispanic Employment Program Committee.
- Individuals with Disabilities Committee.
- Black Employment Program Committee.
- Asian American/Pacific Islander Employment Program Committee.
- American Indian/Alaska Native Employment Program Committee.

The SEPM will serve as the chairperson or technical advisor.

The committee will serve as a working group. Committee members should be appointed through their supervisory chain of command (immediate supervisor or higher) for a period of two years, recommended, but not less than one year. The committee will be a cross section of the workforce and, to the extent possible, should be diverse based on organization, occupation, grade, age, gender, disability, race, national origin, and military or civilian status.

- *For more information, view:*
 - Handbook SEPM

Special Observances:

Special observances are designed to recognize a particular culture or group for their accomplishments and/or contributions to the Air Force. Special observances are conducted to enhance cross-cultural awareness as they promote and celebrate the significance of diversity among all military members and civilian employees.

These observances recognize the achievements made by members of specific racial, religious, ethnic, and gender groups in our society; as well as, promote mutual respect, understanding, teamwork, harmony, pride and esprit de corps among all groups. Participation in special observance programs is voluntary. These programs are designed to educate the workforce and combat stereotypical behaviors. Additionally, these activities are an extension of human relations education objectives for maintaining a healthy human relations climate. Active command support and leadership along with thorough planning are key fundamentals for success of the program. **Note:** Diversity Day activities must be approved by the Installation commander and will not take place in lieu of those special observance months mandated/proclaimed by the President of the United States

Special observances should be conducted as installation-wide activities, planned by an ad hoc committee composed of military members and civilian employees and meet observance objectives and applicable requirements.

- *For more information, view:*
 - <https://www.deomi.org/>
 - Special Observance Listing

Installation Commander:

Senior installation leadership support is key to a successful special observance program.

The installation commander has the authority to establish ad hoc committees to develop awareness programs for each observance.

In the event a special observance committee is not in place, the installation commander should appoint a voluntary working group made up of military members and civilian employees to plan relevant activities for an observance. The group composition may include designated special

emphasis program managers, chairpersons of chartered ethnic heritage clubs/committees and representatives from staff agencies that normally participate in the planning process. Commanders may engage employee resource groups or other base affiliated groups to participate in observance planning.

The installation commander or designee must approve administrative execution of special observance programs. Adequate funding for observance events is an essential element in the success or failure of the programs.

Any special observances, including heritage or history months, that are not previously approved by law, executive order, DoD or AF policy, will require approval at Headquarters Air Force level. A current listing of approved special observances may be found on the DEOMI website at deomi.org.

Requests for a new special observance, as described in paragraph 3.18.4.1. above, must first be endorsed by the local commander or designee and include concurrence at the major command level or equivalent.

Requests for a new special observance will be staffed (through the chain of command) to AF/A1Q, who will forward the request, with a recommendation to approve or disapprove, through the chain of command to AF/A1. Part of this process will include AF/A1Q notifying the applicable program office in DoD.3.16.4. Committee members will serve as organizational liaisons, providing information about the concerns and needs of specific EEO group members in their respective organizations and presenting ideas and/or concerns from the organization to the appropriate committee.

Individuals responsible for facility engineering, personnel, EO, and budget or procurement functions will participate in the IWD committee deliberations, as appropriate, to assure consideration of their respective responsibilities in procedural and policy determinations. Others who should participate are the safety office and the legal staff representative.

Programs sponsored by the SEP committee will focus on identification and removal of barriers to advancement and career development based on race, sex, national origin, or disability.

The SEP committee should establish a Special Emphasis Program Resource Allocation Plan (SEPRAP) designed to assist SEPMs in outlining the amount of time, money and other resources needed to identify program needs and conduct SEP related activities and events. SEPMs provide estimated total number of hours required, costs, and other pertinent information such as: program objectives, responsible officials and target dates. It is suggested to include non-monetary requirements as well (e.g., number of work/staff hours required to plan, execute event). SEPMs should be able to support the need for the requested funding by explaining the value to and impact of the activities on the installation and its mission. SEPRAPs should be approved by the official allocating the funds (or budget manager) and the AEPM prior to the implementation of the planned activities. SEPRAPs are a tool for SEPMs, but not a requirement.

The committee will be established officially by appropriate memorandum and have documented objectives in the appropriate office. Meetings will be scheduled on a regular basis and conducted

according to established agenda. Committee recommendations will be presented to the AEP manager. Minutes of the meetings should be maintained for the record and distributed, as appropriate.

Special Observance Committee Chairpersons:

The committee chairperson or private organization will coordinate with the AEPM for guidance to ensure proper planning of events.

Chairperson responsibilities include:

Soliciting a diverse group of Federal employee volunteers to assist with planning and executing observance events.

Preparing and coordinating all official correspondence.

Notifying the installation commander of proposed dates/events where attendance is requested at least 30 days in advance.

Coordinating with Public Affairs, Security Forces, Chaplain, SJA, FM and Protocol offices as appropriate.

BARRIER ANALYSIS

Barrier Analysis Obligation:

Section 717 of Title VII of the Civil Rights Act requires federal agencies to take proactive steps to ensure EEO for all employees and applicants for employment. EEOC MD-715 interprets this to mean that federal agencies must regularly, at least annually, evaluate their employment practices to identify barriers to equal opportunity for all individuals. Where such barriers are identified, agencies must take measures to eliminate them where appropriate and possible. Note: Some barriers are necessary for mission accomplishment and/or safety and do not require further action.

Air Force Barrier Analysis Working Group (AFBAWG):

The AFBAWG, led by AF/A1Q, is chartered to identify and, if appropriate, propose elimination of barriers to equal employment opportunity in the Air Force. It is responsible for analyzing anomalies found in civilian workplace policies, procedures, and practices with an eye toward identifying their root causes, and, if those root causes are potential barriers, devising plans to eliminate them.

AFBAWG recommendations are made to senior leaders, MAJCOMs, and other appropriate decision-makers at all levels. They will also inform senior leadership of revisions to Air Force policies.

Installation Barrier Analysis Working Group (IBAWG):

Installations with 2,000 or more civilian employees assigned will establish a barrier analysis working group made up of representatives from the CPS, NAF-HRS, EO, and other functional communities, along with other appropriate personnel as designated by the installation commander (or equivalent). The installation AEPM will serve as the chairperson for the IBAWG. For installations with fewer than 2,000 civilians, establishing an IBAWG is optional. Manning, installation need and resources will be considered by the installation commander when determining if an IBAWG is feasible.

The IBAWG is responsible for carrying out the barrier analysis process outlined in this chapter, for its installation. In addition, the IBAWG will be charged with addressing barriers established by the AFBAWG, to the extent practical and possible.

The IBAWG will use data obtained through local means, as well as information made available by AFPC. These tools should be used as sources of information for identifying areas that need improvement, as mentioned in the remainder of this chapter.

The IBAWG will report its findings and recommendations to the installation commander or designee.

Members of the IBAWG should attend barrier analysis training offered by AF/A1Q, the Defense Equal Opportunity Management Institute (DEOMI), the EEOC, or other federal agency.

Each IBAWG will organize into functional teams that model after the AFBAWG teams, but not necessarily identical to them.

A barrier analysis guide, further detailing the functions of the IBAWG, will be made available and should be used in conjunction with this AFI.

Barrier Analysis:

Barrier analysis is an investigation of anomalies found in workplace policies, procedures, and practices that limit or tend to limit employment opportunities for members of any race or national origin, either sex, or based on an individual's disability status. Barrier analysis identifies the root causes of those anomalies, and if necessary, eliminates them.

- The barrier analysis process includes the following steps:
- Identify triggers.
- Explore root causes of triggers.
- Develop action plan.
- Implement action plan.
- Assess action plan results.

Triggers:

A trigger is a trend, disparity or anomaly that suggests the need for further inquiry into a particular employment policy, practice, procedure, or condition.

Barrier:

A barrier is a policy, principle, practice, or condition that limits or tends to limit employment opportunities for members of any race or national origin group, either sex, or for an individual (or individuals) based on disability status.

Physical barriers:

- Inadequate or ineffective reasonable accommodation procedures.
- Lack of compliance with Architectural Barriers Act or Section 508 of the Rehabilitation Act.

Attitudinal barriers:

- Persistence of myths and stereotypes pertaining to capabilities of individuals with disabilities

Structural barriers:

- Complex hiring process.
- Failure to utilize special hiring authorities.

Plan to Eliminate Barriers;

Form a working hypothesis.

- The identification of barriers that occurs during the course of a barrier analysis investigation is conditional only. It is nothing more than a conjecture, and remains a working hypothesis until it can be tested by developing and implementing an action plan. It is only after the results of the action plan are evaluated that a determination can be made as to whether the policy, practice, procedure, or condition dealt within the plan is, in fact, a barrier.

The Action Plan.

- Design and implement corrective plan to address the identified causes of barriers.
- Even if the barrier is job related, explore alternatives that serve the same purpose and have less impact on a particular group of employees.
- Progress should be measurable and agency officials accountable.
- Periodic reassessments should be conducted to adjust plan if necessary.
- Report plan and progress annually to the installation commander.

Assessing Results:

Indicators of success may be revealed in higher participation rates, lower separation rates, fewer complaints, more favorable survey responses, etc.

- If the plan is unsuccessful, then:
- The wrong barrier was identified; or
- The action gave rise to a new barrier; or

- There was not a barrier.

Generally, it is extremely difficult, if not impossible, to assess the results of an action plan after only one reporting cycle. However, after two or more consecutive cycles, trends in one direction or the other should begin to become apparent. The process is an ongoing one.

Reassessments:

Periodic reassessments should be done to see whether action plan needs adjustment.

Report:

Report plan and progress annually to the installation commander.

Management Directive 715 (MD-715):

The MD-715 is the policy guidance that EEOC provides to federal agencies for use in establishing and maintaining effective EEO programs as required by Title VII and the Rehabilitation Act.

Six essential elements of the Model EEO Program:

- Demonstrated commitment from agency leadership.
 - Integration of EEO into the agency's strategic mission.
 - Management and program accountability.
 - Proactive prevention of unlawful discrimination.
 - Efficiency.
 - Responsiveness and legal compliance
- *For more information, view:*
 - Model EEO Program

Reasonable Accommodations:

Individual with a Disability (IWD)—A person who has a physical or mental impairment that substantially limits one or more major life activities, has a record of such impairment, or is regarded as having an impairment (regardless of whether or not it limits or is perceived to limit a major life activity).

Qualified Individual with a Disability— An individual with a disability, who satisfies the requisite skill, experience, education and other job-related requirements of the employment position such individual holds or desires, and who, with or without reasonable accommodation, can perform the essential functions of such position.

An individual “regarded as” having such an impairment is **not** entitled to reasonable accommodation.

Exceptions to the definition of “Individual with a Disability”

Non-coverage - The term individual with a disability does not include individuals currently engaging in the use of illegal drugs when an employer acts on the basis of such use. Nor does it include the following sexual and behavioral disorders: transvestism, transsexualism, pedophilia, exhibitionism, voyeurism, gender identity disorders not resulting from physical impairments, or other sexual behavior disorders; compulsive gambling, kleptomania, or pyromania; or psychoactive substance use disorders resulting from current illegal use of drugs. In addition, tests for use of illegal drugs are not considered medical examinations and, therefore, are not subject to the restrictions on medical examinations imposed by the Rehabilitation Act and the ADA. An employer does not have to employ an individual with a disability who poses a direct threat to the health or safety of him/herself or of others in the workplace.

Reasonable Accommodation

Any modification or adjustment to a job, an employment practice, or the work environment that enables a qualified individual with a disability to enjoy equal employment opportunities.

- Reasonable accommodation may include, but is not limited to:
- Making existing facilities used by employees readily accessible to and usable by individuals with disabilities;
- Job restructuring, modifying work schedules, or reassignment of a current employee to a vacant position; and
- Acquiring or modifying equipment or devices, adjusting or modifying examinations, training materials, or policies, and providing qualified readers or interpreters.

Reasonable accommodations are not limited to items that permit the employee to perform the essential functions of the job.

An employer is not obligated to provide personal use items such as glasses or hearing aids.

An employer is not required to remove an essential function of the job as a reasonable accommodation.

An employer shall hold employees with disabilities to the same standards of performance and conduct as other similarly situated employees without disabilities. An employee with a disability is expected to meet the same production standards, whether quantitative or qualitative, as a non-disabled employee in the same job. Lowering or changing a production standard because an employee cannot meet it due to a disability is not considered a reasonable accommodation.

Undue Hardship

Employers do not have to provide any accommodation that would pose an undue hardship on the operation of the agency. Undue hardship focuses on the resources and circumstances of the particular employer in relationship to the cost or difficulty of providing a specific accommodation and refers to reasonable accommodations that are unduly extensive, substantial,

or disruptive, or those that would fundamentally alter the nature or operation of the business or organization.

When considering whether the expense of a potential accommodation constitutes an undue hardship, the budget of the entire agency, i.e., the Air Force as a whole, is to be taken into account.

Interactive Process

An interactive communication process with an employee who has requested an accommodation (or otherwise indicated a need) in order to clarify the specific nature of the disability and identify the appropriate reasonable accommodation. This may include asking relevant questions that enables the supervisor or management official to make an informed decision regarding Air Force's accommodation responsibilities in a specific situation.

Supervisors and Managers will:

Work in consultation with the local CPS/NAF-HRS, DPM and, when appropriate, the servicing legal office, in the receipt, review, and determination process in response to an employee's reasonable accommodation request, and participate in the interactive process concerning potential reasonable accommodation.

- *For more information, view:*
 - RAR Form Template -2ID (Reasonable Accommodations Request Form)
 - SF Form 256 Self Identification of Disability
 - Schedule A Hiring Authority Fact Sheet
 - Workforce Recruitment Program
 - www.wrp.gov
 - WRP Employer Guide
 - MYPERS
 - https://mypers-opa.cx.usd.oraclecloud.com/mypers_opa/owdb/0/investigate/Wounded+Warrior/en-US/ScreenOrder~Main~qs%24f760dc04-6525-46bc-9350-4093c28c3066%24global%24global
 - This site below is where individuals on and off base can load their Schedule A/Transcripts/Resume to the database to be considered for job opportunities.