

**Farm Credit Administration
Office of Inspector General**

Inspection Report

FCA's Implementation Efforts for the 2017-2018 Fairness and Inclusiveness Assessment

I-20-01

July 29, 2020

FCAOIG

Farm Credit Administration
Office of Inspector General



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The Honorable Glen R. Smith, Board Chairman
The Honorable Jeffery S. Hall, Board Member
Farm Credit Administration
1501 Farm Credit Drive
McLean, Virginia 22102-5090

Dear Chairman Smith and Board Member Hall:

The Office of Inspector General (OIG) completed an inspection of the Farm Credit Administration's (FCA or Agency) implementation efforts for the 2017-2018 Fairness and Inclusiveness Assessment (assessment). The objective of the inspection was to analyze FCA's implementation of diversity and inclusion efforts, and we limited our scope to the assessment. We did not review FCA's agencywide diversity, inclusion, and equal employment opportunity program.

In July 2017, FCA's Office of Equal Employment Opportunity and Inclusion hired a contractor to conduct an assessment to identify strengths and challenges of FCA's diversity and inclusion efforts. In August 2018, the contractor issued the final report that included 15 recommendations and 50 actions with steps the Agency can take to implement each recommendation.

The OIG found that the Agency had taken preliminary steps to assess and implement recommendations in the contractor's assessment. However, we identified areas for improvement in the Agency's implementation and tracking of recommendations in the assessment. We made five recommendations to improve diversity and inclusion efforts resulting from the assessment. FCA agreed to the five recommendations and provided appropriate corrective actions for each recommendation.

We appreciate that FCA remains committed to encouraging diversity and inclusion in the workplace and understands the importance of continuous improvement. We appreciate the courtesies and professionalism extended by FCA to our staff during the inspection. If you have any questions about this inspection, we would be pleased to meet with you at your convenience.

Respectfully,

A handwritten signature in black ink that reads 'Sonya K. Cerne'.

Sonya K. Cerne
Assistant Inspector General for Audits, Inspections, and Evaluations

cc: Wendy Laguarda, Inspector General
Thais Burlew, Director of the Office of Equal Employment Opportunity and Inclusion

EXECUTIVE SUMMARY

FCA's Implementation Efforts for the 2017-2018 Fairness and Inclusiveness Assessment

Report No. I-20-01

July 29, 2020

Objective and Scope

The objective of this inspection was to analyze FCA's implementation of diversity and inclusion efforts. Our scope was limited to FCA's 2017-2018 Fairness and Inclusiveness Assessment. We did not review FCA's agencywide diversity, inclusion, and equal employment opportunity program.

Recommendations

1. We recommend the Office of Equal Employment Opportunity and Inclusion document actions, milestones and accountabilities to address recommendations in the fairness and inclusiveness assessment, including justifications for tabling or not implementing recommendations and actions.
2. We recommend the Office of Equal Employment Opportunity and Inclusion document a monitoring plan for updating information in the tracking site through completion or closure of each recommendation and associated action.
3. We recommend the Office of Equal Employment Opportunity and Inclusion update all employees on the status and current priorities of actions to address recommendations in the assessment.
4. We recommend the Office of Equal Employment Opportunity and Inclusion brief current FCA leadership on the assessment results, implementation progress, priorities, and monitoring plan.
5. We recommend the Office of Equal Employment Opportunity and Inclusion, in coordination with the contracting staff, review the contract file for the fairness and inclusiveness assessment and add all available documentation necessary to fully support award decisions and conclusions reached by the evaluation team.

The Farm Credit Administration (FCA or Agency) is an independent federal agency responsible for regulating, examining, and supervising the Farm Credit System (System) and the Federal Agricultural Mortgage Corporation (Farmer Mac). The Agency's mission is to ensure that System institutions and Farmer Mac are safe, sound, and dependable sources of credit and related services for all creditworthy and eligible persons in agriculture and rural America.

FCA's employees are its most important resource. Diversity and inclusion are essential to achieving an environment in which all employees can reach their full potential. FCA's commitment to diversity and inclusion is established in its Equal Employment Opportunity and Diversity board policy statement. The Agency strives to create, maintain, and continuously improve on an organizational culture that fully recognizes, values, and supports employee diversity.

To identify strengths and challenges of FCA's diversity and inclusion efforts, the Office of Equal Employment Opportunity and Inclusion (EEOI) hired a contractor to independently conduct an assessment in July 2017. This initiative began under FCA's prior Board Chairman and Chief Executive Officer (CEO). The project objective was to assess the inclusiveness of the FCA workplace; identify barriers, if any, to equal opportunity and advancement to higher ranks; and develop recommendations to remove barriers if any were found.

The contractor's final report was issued in August 2018. The report was shared with employees in October 2018, along with a message from the former Board Chairman about recommendations from the assessment and the Agency's focus areas. FCA designated a new Board Chairman and CEO in July 2019. The Agency experienced additional key leadership changes between August and October 2019, including the Chief Operating Officer and Chief Examiner.

The contractor's assessment identified strengths in FCA's diversity and inclusion efforts, including:

- Staff are engaged and mission-focused;
- Employees believe diversity and inclusion are important and they share responsibility for it;
- Employees feel their rating officials respect them and support their work/life balance needs; and
- Employees believe their rating officials foster an environment where diverse employees can interact effectively in the workplace.

EXECUTIVE SUMMARY

FCA's Implementation Efforts for the 2017-2018 Fairness and Inclusiveness Assessment

Report No. I-20-01

July 29, 2020

Objective and Scope

The objective of this inspection was to analyze FCA's implementation of diversity and inclusion efforts. Our scope was limited to FCA's 2017-2018 Fairness and Inclusiveness Assessment. We did not review FCA's agencywide diversity, inclusion, and equal employment opportunity program.

Recommendations

1. We recommend the Office of Equal Employment Opportunity and Inclusion document actions, milestones and accountabilities to address recommendations in the fairness and inclusiveness assessment, including justifications for tabling or not implementing recommendations and actions.
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4. We recommend the Office of Equal Employment Opportunity and Inclusion brief current FCA leadership on the assessment results, implementation progress, priorities, and monitoring plan.
5. We recommend the Office of Equal Employment Opportunity and Inclusion, in coordination with the contracting staff, review the contract file for the fairness and inclusiveness assessment and add all available documentation necessary to fully support award decisions and conclusions reached by the evaluation team.

We found FCA had taken certain preliminary steps to assess and implement recommendations in the contractor's assessment. In July and August 2019, EEOI convened a workgroup to discuss recommendations in the report and areas of responsibility within the Agency. The Agency also began taking action to address recommendations in the assessment by conducting field office visits with senior officials, distributing an internal communication about Agency benefits, and creating videos introducing Agency leadership.

We found areas for improvement in the Agency's implementation and tracking of recommendations in the assessment. The Agency had not developed specific action plans, milestones, and accountabilities to address recommendations in the contracted assessment. In March 2020, the Agency took a positive step and began developing a tracking site to document the status, accountable offices and individuals, and quarterly updates for each recommendation in the assessment. However, during our review, the site was not complete and missing key elements to track progress. We also found that the Agency did not follow the internal competitive contracting process for the assessment award.

Improvements in documentation, communication, and accountabilities will help ensure the Agency realizes the full benefits of the independent assessment and further demonstrates its commitment to fostering diversity and inclusion.

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ACRONYMS AND ABBREVIATIONS

Agency or FCA	Farm Credit Administration
CEO	Chief Executive Officer
CLF	Civilian Labor Force
EEOI	Office of Equal Employment Opportunity and Inclusion
Farmer Mac	Federal Agricultural Mortgage Corporation
HR	Human Resources
IDP	Individual Development Plan
OAS	Office of Agency Services
OCPA	Office of Congressional and Public Affairs
OE	Office of Examination
OIG	Office of Inspector General
OPM	Office of Personnel Management
SEP	Special Emphasis Program
System	Farm Credit System

BACKGROUND

The Farm Credit Administration (FCA or Agency) is an independent federal agency responsible for regulating, examining, and supervising the Farm Credit System (System) and the Federal Agricultural Mortgage Corporation (Farmer Mac). The Agency's mission is to ensure that System institutions and Farmer Mac are safe, sound, and dependable sources of credit and related services for all creditworthy and eligible persons in agriculture and rural America.

Employees are FCA's most important resource in achieving its mission. Diversity and inclusion are essential to achieving an environment in which all employees can reach their full potential. Diversity and inclusion are also essential elements of the Agency's strategic plan. FCA's strategic plan includes a goal to cultivate an environment that fosters a well-trained, motivated, and diverse staff while providing an effective plan for leadership success.

Diversity and inclusion goals, priorities, and actions are further defined as part of the Agency's diversity and inclusion strategic plan. The plan states:

- Goal 1 Tone at the Top: We will intensify our diversity and inclusion efforts through the active participation of leadership to accomplish the agency's mission.
- Goal 2 Workplace Inclusion and Engagement: We will strive to create and foster an inclusive environment that encourages employees to feel uniquely valued and experience a sense of belonging, engagement, and connection to the agency's mission.
- Goal 3 Data-Driven Diversity: We will strive to create and engage a diverse, high-performance workforce, using data-driven approaches and optimizing policies, processes, and programs to drive inclusion and diversity efforts and accomplish the agency's mission.

FCA has reaffirmed its commitment to equal employment opportunity and diversity in Policy Statement 62, which states that all FCA employees should be treated with dignity and respect and FCA prohibits discrimination in its policies, program practices, and operations. In addition, the policy provides that employees, applicants for employment, and members of the public who seek to take part in FCA programs, activities, and services will be treated fairly. The FCA Board Chairman, who also serves as the Chief Executive Officer (CEO), is ultimately responsible for ensuring that FCA meets all equal employment opportunity and diversity requirements and initiatives in accordance with laws and regulations, to maintain a workplace that is free from discrimination and that values all employees.

FCA's Office of Equal Employment Opportunity and Inclusion (EEOI), led by the Director of EEOI, manages and directs the Agency's diversity, inclusion, and equal employment opportunity program. The EEOI Director reports directly to FCA's Board Chairman and CEO, underscoring the importance and independence of the office. EEOI provides advice and leadership to Agency management to carry out its continuing policy and program of nondiscrimination, affirmative action, and diversity. EEOI also serves as the chief liaison with the Equal Employment Opportunity Commission and the Office of Personnel Management on all equal employment, diversity, and inclusion issues.

As an initiative that began under the prior Board Chairman and CEO, EEOI sponsored an assessment to identify strengths and challenges of FCA's diversity and inclusion efforts. The Agency hired a contractor in July 2017 to independently conduct the assessment in order to safeguard confidentiality. The total contract value was \$76,241. The project objective was to assess the inclusiveness of the FCA workplace; identify barriers, if any, to equal opportunity and advancement to higher ranks; and develop recommendations to remove barriers if any are found. The assessment was designed to help management understand employees' views on:

- Work experiences and work/life balance,
- Opportunities for career development and advancement,
- Efforts of rating officials and senior leadership to promote a fair and inclusive work environment, and
- Overall effectiveness of creating a fair and inclusive work environment.

The contractor was responsible for conducting a survey, reviewing FCA documents and data, interviewing leadership and external stakeholders,¹ conducting focus groups, and preparing a report with recommendations. The survey was designed to provide more in-depth insight on equal employment at FCA, beyond what is included in the Federal Employee Viewpoint Survey. The report noted that FCA had ranked 3 out of 28 small agencies on the 2017 Best Places to Work Index based on the Federal Employee Viewpoint Survey. The survey included about 90 questions in 8 different areas. Of the 286 employees invited to take the survey, 245 completed the survey (about 86%). FCA employees responded to the survey in November 2017.

The contractor issued its final report on August 29, 2018. The report identified FCA's commitment to diversity and inclusion and its intent to be a model employer with a workforce that reflects the diversity of the Nation. The report included 15 recommendations with 50 actions to enhance the Agency's diversity and inclusion efforts (see Appendix A for a listing of all recommendations and associated actions). The final report was shared with all employees in October 2018, along with the Agency's initial plans for implementing recommendations.

Prior Reviews

In February 2016, the Office of Inspector General (OIG) completed an audit of human capital planning at FCA that contained areas related to the inspection objective. The objectives of this audit were to assess the adequacy of the Agency's human capital planning and the effectiveness of its implementation. The report made 11 recommendations, with the following five recommendations pertaining to FCA's workplace diversity and inclusion:

- Consider a veterans' representative for Agency veteran efforts;
- Provide training to all personnel involved in the recruiting and hiring process on potential biases and barriers to employment;
- Conduct an assessment of FCA hiring practices to identify potential barriers and areas of improvement;
- Establish a policy that includes the plan for requesting and analyzing applicant flow data for FCA job announcements; and
- Conduct a survey, or use other information-gathering tools, to gather additional targeted information on workplace diversity and inclusion.

All recommendations in the report were closed by September 2016.

¹ External stakeholders included five individuals at historically black colleges and universities with AgBusiness concentrations and professionals of color with AgBusiness degrees to assess FCA's reputation within the diverse talent marketplace.

INSPECTION RESULTS

The objective of this inspection was to analyze FCA's implementation of diversity and inclusion efforts. We limited our scope to FCA's 2017-2018 Fairness and Inclusiveness Assessment (assessment). We did not review FCA's agencywide diversity, inclusion, and equal employment opportunity program.

We found that FCA had taken initial positive steps to communicate the results of the assessment and distribute the final report and recommendations to all employees. The report was shared with employees in October 2018 along with a message from FCA's then Board Chairman and CEO explaining which recommendations the Agency would prioritize from the assessment. The contractor's report also identified strengths at FCA, including:

- Staff are engaged and mission-focused;
- Employees believe diversity and inclusion are important and they share responsibility for it;
- Employees feel their rating officials respect them and support their work/life balance needs; and
- Employees believe their rating officials foster an environment where diverse employees can interact effectively in the workplace.

The Agency had taken certain preliminary steps to assess and implement recommendations in the contractor's assessment. Specifically, in July and August 2019, EEOI convened a workgroup to discuss recommendations in the report and areas of responsibility within the Agency. During the same timeframe, in July 2019, the President designated a new Board Chairman and CEO and the Agency experienced additional leadership changes in the following months. The Agency began implementing certain actions in response to the assessment, including conducting field office visits by senior officials, distributing an internal communication about Agency benefits, and creating videos introducing Agency leadership.

We found areas for improvement in the Agency's implementation and tracking of recommendations in the assessment. Although it took a positive step and began developing a tracking site, the Agency had not developed specific action plans, milestones, and accountabilities to address recommendations in the assessment. In addition, the award for the assessment did not follow the Agency's competitive procurement process, and the contract file was incomplete. Improvements in documentation, communication, and accountabilities will help ensure the Agency realizes the full benefits of the independent assessment and further demonstrate its commitment to fostering diversity and inclusion.

Implementation Efforts

The Agency could improve its implementation efforts related to the assessment. EEOI led the initiative to conduct a fairness and inclusiveness assessment at FCA. In August 2018 the contractor issued its final report including 15 recommendations and 50 actions with steps the Agency can

take to implement each recommendation.² The assessment was designed to identify strengths and challenges of diversity and inclusion efforts at FCA. The assessment stated:

“Recommendations that result from this study will be used as input to a process that will determine FCA’s path of action. At the end of that process, FCA will have articulated specific plans, timelines, and accountabilities to help us better achieve FCA’s commitment to diversity and inclusion- including our intent to build and maintain a workforce that reflects the rich diversity of individual differences evident throughout this Nation. These efforts are grounded in FCA’s leadership’s conviction that when individual differences are respected, recognized, and valued, diversity becomes a powerful force that can contribute to achieving superior results.”

In October 2018, the contractor’s final assessment report was shared agencywide along with a message from FCA’s then Board Chairman and CEO on initial plans for implementation. The Agency’s internal communication with employees stated that it would evaluate each recommendation in the assessment and immediately focus on the following recommendations:

- Help bridge the generational gaps that can sometimes present a barrier to having a culture of inclusion and continuous improvement,
- Find ways to better inform employees about the work/life programs available to them,
- Address and identify hiring barriers,
- Build on the relationships we have established with diverse universities and professional groups,
- Develop more opportunities for leadership and staff to build relationships,
- Continue coordination between EEOI and Human Resources to better achieve goals, and
- Distinguish between preferences and requirements in job postings.

Plans, Timelines, and Accountabilities

During our review, we found that the Agency had not put in place specific plans, timelines, and accountabilities to address recommendations from the assessment. A working group was formed with members of EEOI, the Office of Agency Services (OAS), the Office of Examination (OE), and the Office of Congressional and Public Affairs (OCPA) to discuss each recommendation in the assessment. The working group met twice, in July and August of 2019, about a year after the final report was issued. EEOI prepared notes from the meetings about each recommendation and how it would be addressed. The EEOI Director stated that there were several discussions with senior officials about the assessment before the working group was established; however, notes from the working group meetings were the Agency’s only documented plan to address recommendations in the assessment.

The notes included responsible offices and short descriptions of planned actions, tabled items, and areas that had already been addressed by the Agency. However, the working group’s notes did not provide a comprehensive plan with milestones, documented follow-up, descriptions of

² See Appendix A for a listing of report recommendations and associated actions.

the Agency’s evaluation of each recommendation, or a schedule to monitor implementation progress. Specifically, the notes were vague and indicated planned actions for 21 of the 50 associated actions in the report. The following are examples of the working group notes that lacked detailed actions:

Report Recommendation	Working group notes
"Conduct job analysis to determine whether criteria are requirements or preferences. Assess whether each criterion is so non-negotiable that FCA/OE would be willing to bypass a superstar who doesn't meet that criterion. If not, the criterion is a preference..."	"Expand on what OAS already does and communicate to staff."
"Implement Individual Development Plans (IDPs) agencywide. Provide detailed guidance on IDP implementation, focused on open and honest feedback, resources, actions to improve performance, and consistent implementation across team members."	"OAS"
"Update SEP goals and charters to include a strategic mission enabler; reflect the inclusion of activities that advance the FCA mission and staff development needs to achieve the mission (e.g., SEPs should identify actions and activities to close gaps and execute recommendations outlined in this report)..."	"Share information"
"Recruit internally and encourage applicants to apply for promotions; strive to have a diverse slate of candidates that reflect the civilian labor force (CLF) and federal civilian workforce."	"OAS working on policy succession planning. Creating stand-alone Human Capital Plan. Communicate to staff there is no retirement wave."

Of the 50 actions in the assessment report, the Agency noted it would “table” 22 to evaluate at a later date. In general, the working group’s notes stated “table,” and did not explain why the recommendation was tabled or the date that the Agency would reevaluate the recommendation. Two complete recommendations (with 10 associated actions) were tabled, including:

- Hold all FCA employees accountable for diversity and inclusion,³ and
- Identify Historically Black Colleges and Universities, Hispanic Serving Institutions, American Indian Higher Education Consortium institutions and diverse professional groups that FCA/OE will commit to building long-term relationships with, and develop a plan to achieve a high yield of applicants.

³ FCA includes a performance standard on diversity and inclusion for employees so that they are evaluated in this area as part of overall job performance.

The following actions were also tabled without an explanation of the Agency’s justification:

- Increase transparency in senior leadership decision-making such as communicating the ways in which employee input was considered, the “why” behind the decision, and sharing weekly meetings notes (as appropriate); communicate priority decisions via face-to-face methods in addition to written communications.
- Provide sample follow-up, trigger questions for Board and leadership to ask when discussing decisions with Directors and below.
- Develop an “assessing decisions with a diversity and inclusion lens” tool for the Board, leaders, managers, and supervisors to apply during decision-making.
- Set expectation that leaders, managers, and supervisors take risks on younger employees when delegating tasks, identify and develop emerging leaders, and focus on communicating institutional knowledge; hold leadership, managers, and supervisors accountable.
- Hold supervisor roundtables, by managerial level, to share diversity and inclusion best practices and solve diversity and inclusion challenges.
- Provide coaches for Board and leadership focused on creating and leading diverse and inclusive environments.
- Provide coaches for managers struggling to create and manage diverse teams and inclusive environments.
- Including recognition for individuals who stepped in to cover people on special assignments.
- Ensuring principles of diversity and inclusion are integrated into award and recognition (e.g., someone cannot be recognized as a best performer, if he/she has demonstrated anti-diversity and inclusion behaviors).
- Conduct diversity dialogues with mix of race, gender, level, etc. staff to discuss past and current harms experienced, diversity and inclusion myths and misconceptions, capacity for forgiveness, and what amelioration and moving forward looks like.
- Ensure that OE’s decision criteria – formal and informal – are bias-free and are used in a consistent manner, to give women and people of color their fair share of high-visibility opportunities.
- Try “Five Cups of Coffee” in which a Board member or leader schedules coffee with small groups of staff.

For the remaining seven actions in the assessment report, the working group noted no action would be taken or that the recommended action was being addressed, with little or no explanation. The following table shows the working group notes for these seven items:

Action	Working Group Notes
"Require all surveys and data collection to disaggregate results by race and gender demographics (at a minimum). To protect survey participants anonymity, don't compute or report results for any subgroup with fewer than 10 members. Review and develop	"Already doing"

targeted strategies to close gaps or inequities.”	
“Create regular touchpoints between OE and OAS and EEOI to develop and implement OE’s human capital processes. For example, include OAS or EEOI staff on panels that conduct interviews and make hiring and promotion decisions. Involve OAS/EEOI in data tracking and review, for example, to increase accountability and transparency regarding career development and advancement opportunities across demographic differences.”	“Already doing. Share information. Incorporate OAS more into SEP activities.”
Increase transparency, communication, roles/responsibilities, and accountability related to the agency’s diversity and inclusion goals.	“Already doing. Share information. Incorporate OAS more into SEP activities.”
“Develop a FCA-specific definition of diversity and inclusion and include in all key FCA documents (e.g., Human Capital Plan, Strategic Plan, Diversity and Inclusion Plan), FCA website (EEO and Diversity tab), and applicable policies.”	“Following OPM EEO Directives”
“Separate EEO and Diversity into separate tabs on FCA’s website.”	“Following OPM EEO Directives”
“Create separate sections for EEO and diversity and inclusion in all key documents and when communicating to staff; add final to communications plan (see recommendation #1).”	“Following OPM EEO Directives”
“Update language in documents to clarify when FCA means specifically race and gender diversity.”	“Following OPM EEO Directives”

Tracking Site

Recent efforts by the Agency are a step in the right direction, but improvements are needed to increase the effectiveness of the site to document and track implementation efforts. During our inspection, the Agency began developing an internal site to track and document the Agency’s implementation of recommendations from the assessment. The site, developed in March 2020, includes fields for:

- Start date,
- Status,

- Completed date,
- Division/individual assigned,
- Quarterly updates, and
- Priority.

As of May 2020, the site listed a January 2020 start date for implementing recommendations. In addition, the status of all recommendations was noted as “in process,” “tabled,” or “not started,” with no recommendations noted as complete. The site documented the assigned program office for most items; however, the site only listed a responsible individual for eight actions. Quarterly updates were documented for ten actions, and seven of these updates were the notes from the working group meetings in July and August 2019. The following table shows the status of items in the tracking site by program office:

Program Office Assigned	In Process	Not Started	Other
EEOI	3	7	
OAS	2	2	
OE	5		
OCPA	1		
OAS and OE	3		
EEOI and OCPA		1	
OCPA and OAS	1		
EEOI and OAS	4		
No Division listed - Not Started			4
No Division listed - Tabled			17
Total	19	10	21

For the 50 actions in the newly developed tracking site, 3 were rated “high” priority, 17 were rated “low” priority and the rest were rated “normal” priority. In general, tabled items were deemed low priority. However, priorities assigned in the tracking site did not align with what had been communicated to employees. For example, the Agency’s only communication with employees about plans to address the assessment said two of the recommendations it would focus on immediately were to bridge generational gaps and distinguish between preferences and requirements in job postings. However, neither of these recommendations were identified as high priority in the tracking site. The recommendation to establish a generations SEP was assigned a low priority and had not been started. The recommendation to distinguish between preferences and requirements had three associated actions. Two were deemed normal priority and had not been started, and one was tabled and deemed low priority.

The tracking site provided a centralized location to document progress; however, key elements were missing. The site listed recommendations and associated actions, but it did not include specific actions the Agency planned to take. For example, the site included the following action from the final assessment and ranked it as a “high” priority: “Increase Board and senior leadership interaction with staff (e.g., Town Halls, reverse mentoring, matrix mentoring, regular trips to field locations).” There was no description of specific steps the Agency planned to take to address this

item. The tracking site included a first quarter update which stated that field office visits were conducted and that OCPA has been publishing videos introducing FCA leadership. Along with planned action steps and missing information about responsible personnel, there were no target completion dates to track Agency progress.

Implementation Challenges

Several factors contributed to implementation challenges. First, the Agency waited almost a year to establish a working group to address recommendations in the assessment. Although the final assessment was completed in August 2018, the working group did not meet until July 2019. The EEOI Director stated that there were several discussions with senior officials about the Agency's response to the assessment; however, notes from the two working group meetings were the first and only documented steps for addressing recommendations in the assessment. After the working group's last meeting in August 2019, no additional meetings or follow-up were scheduled to discuss or document the status of the Agency's implementation efforts. The tracking site was not developed until March 2020, 19 months after the final report was issued and after the start of this review.

A lack of centralized accountability was another factor that contributed to implementation challenges. Recommendations in the assessment involved multiple program offices and individuals across the Agency, including OAS, OE, OCPA, and most importantly EEOI. With so many different offices and individuals involved, the Agency needs a more centralized project manager role to ensure plans and actions are tracked, communicated, and implemented in a manner consistent with the message to employees and FCA diversity goals.

Finally, another challenge to implementing the assessment recommendations has been significant leadership changes experienced by the Agency after the completion of the assessment. Since the final report was issued in August 2018, new individuals were appointed to the following key leadership positions:

- Chairman of the Board and CEO in July 2019,
- Chief Operating Officer in August 2019, and
- Chief Examiner in October 2019.

Changes in leadership can change focus areas and priorities, further supporting the need to document specific plans, follow-up with centralized accountability, and communicate with employees.

Complete documentation provides a record of the Agency's response to the assessment. Without documented plans, milestones, and accountabilities it is difficult to determine the status of implementation efforts and when planned actions will be completed. Furthermore, clear action steps and milestones ensure the Agency is committed to completing recommendations in the assessment. Specific, detailed follow-up and implementation is especially important given FCA's significant investment to identify areas to strengthen diversity and inclusion efforts. A delayed response can create the perception that the assessment was not a priority or current focus for the

Agency. Employee input through a survey and focus groups was a key component of the assessment. Therefore, it is even more important that employees know their input was fully considered and changes were implemented as a result of findings and recommendations in the assessment. Delayed action and limited communication may also discourage employees from participating in future assessment efforts and providing open and honest feedback.

Recommendations 1-4

To improve diversity and inclusion efforts resulting from the assessment:

1. We recommend the Office of Equal Employment Opportunity and Inclusion document actions, milestones, and accountabilities to address recommendations in the fairness and inclusiveness assessment, including justifications for tabling or not implementing recommendations and actions.
2. We recommend the Office of Equal Employment Opportunity and Inclusion document a monitoring plan for updating information in the tracking site through completion or closure of each recommendation and associated action.
3. We recommend the Office of Equal Employment Opportunity and Inclusion update all employees on the status and current priorities of actions to address recommendations in the assessment.
4. We recommend the Office of Equal Employment Opportunity and Inclusion brief current FCA leadership on the assessment results, implementation progress, priorities, and monitoring plan.

FCA Response

The Agency agreed with the recommendations (see additional responses in the Management Comments section of this report). EEOI stated the tracking site will be implemented with documented actions, milestones, and accountable offices. EEOI will document the rationale when it decides not to move forward with a recommendation, based on business judgment, and all remaining recommendations will be tracked through completion. EEOI stated a monitoring plan would be developed to specifically address how information will be updated in the tracking site for each recommendation and associated action. Estimated completion dates for the tracking site and monitoring plan were noted as August 31, 2020.

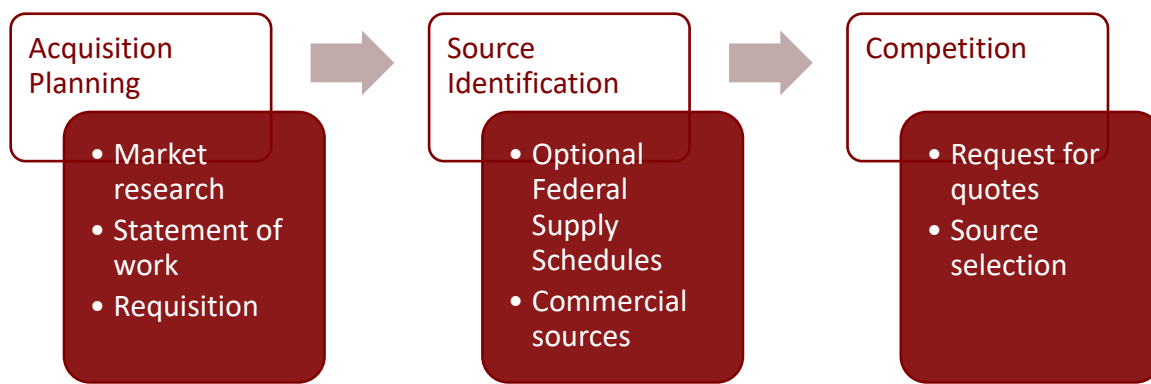
Within 30 days of implementing the tracking site, EEOI plans to communicate with staff and brief the FCA Chairman. EEOI stated that employees will be updated through the Agency's internal newsletter and the Chairman will receive an overview of assessment results, implementation progress, priorities, and the monitoring plan.

OIG Response

The OIG finds the planned actions responsive to our recommendations.

Contracting Process

During our review, we found that the Agency did not follow internal procedures and the contract file was missing necessary information. To safeguard confidentiality and utilize diversity specialists, FCA hired a contractor to conduct its assessment. The award was classified as competitive and totaled \$76,241. As a non-appropriated fund agency, FCA is not subject to certain governmentwide procurement requirements. FCA's procurement policy is established through the Policies and Procedures Manual 812, Contracting/Procurement Policy and acquisition procedures in OAS Directive 4, Contracts Desk Manual. The Contracts Desk Manual describes FCA's competitive procurement process, which includes acquisition planning, source identification, and competition.



Acquisition planning includes working with procurement personnel to develop a comprehensive plan and requirements package. The statement of work is part of this package and describes the project objective, required services, deliverables, and period of performance. The Contracts Desk Manual states that a statement of work and issuance of a formal request for quotes is deemed advisable for most situations involving consulting, advisory, and assistance services contracts, to ensure that project requirements and Agency expectations are conveyed in a clear, unequivocal manner. Evaluations performed for competitive procurements must be documented to support the conclusions reached by the evaluating team and show the differences between proposals and the judgment that led to the selection decision.

In reviewing the award for FCA's assessment, we found:

- Requirements were established after a contractor was selected. The EEOI Director notified procurement that a vendor was selected to initiate a contract in May 2017. In June 2017, procurement provided EEOI with a statement of work, vendor evaluation forms, and price comparison research. Pricing research was not included in the contract file and did not include the type of assessment services being procured by the Agency. The statement of work in the contract file was prepared by procurement and included required services and deliverables from the selected vendor's proposal. The statement of work did not include selection factors or the basis for the Agency's award decision. The requisition for the

contractor was dated July 5, 2017, and the award was signed by the Contracting Officer on July 6, 2017.

- Vendor evaluation forms were created and completed after a contractor was selected in May 2017. Three evaluation forms were included in the contract file and were dated June 14, 2017. Evaluation forms were completed by the EEOI Director, not other members of the evaluation team.
- A request for quotes was not issued for the award. EEOI identified vendors and contacted them directly. Because a request for quotes and requirements package were not issued, proposals were based on discussions with EEOI. As an example, correspondence in the contract file stated "I like to think of this as a continuation of our earlier conversation- not as a final offer or line in the sand. So if there's anything that can help make this work better for you- more information or any changes, please don't hesitate to reach out." EEOI received four proposals between October 2016 and April 2017.
- Documentation in the contract file did not fully support procurement decisions. A memorandum to file in the contract file stated that the selected contractor's proposal was the most comprehensive and included use of a survey, focus groups, and individual interviews, along with policy review. Vendor evaluations did not fully explain differences between proposals and comparisons that led to the selection decision. The three evaluation forms in the contract file rated vendors in four areas related to past experience as well as price. Rankings included: outstanding, excellent, average, or unacceptable without supporting information. In addition, the vendor with the lowest price was rated "unacceptable" for price without an explanation.
- Although four proposals were received by EEOI, only three were included in the contract file. In addition, the EEOI Director provided correspondence showing that the selected vendor modified its initial proposal to "get to FCA's budget." Documentation related to this negotiation, including the original proposal, was not included in the contract file.

Procurement personnel stated that the award did not follow the normal competitive process because there was an urgency to complete the award. The EEOI Director stated instructions were followed from procurement officials who are no longer with the Agency and that requirements for the contract were not posted by procurement because it was not required and less efficient. Although FCA has additional flexibilities as a non-appropriated Agency, a requirements package and request for quotes ensure awards are fair and the best value for the Agency. This is especially important for higher value contracts with multiple vendor options. Not following the competitive contracting process and documenting conclusions can bring into question award decisions and raise overall concerns with vendor selection, which can create liabilities for the Agency.

The assessment award period of performance ended in September 2018. However, it is important for the contract file to include all records to support Agency decision-making and procurement actions. As of May 2020, the contracting specialist and two contracting officers involved in the

award for the assessment had left the Agency. Because of procurement personnel turnover and EEOI's role in identifying sources, discussing proposals, and negotiating with vendors, EEOI can provide documentation to complete the contract file.

Recommendation 5

To ensure complete records are maintained:

5. We recommend the Office of Equal Employment Opportunity and Inclusion, in coordination with contracting staff, review the contract file for the fairness and inclusiveness assessment and add all available documentation necessary to fully support award decisions and conclusions reached by the evaluation team.

FCA Response

The Agency agreed with the recommendation (see additional responses in the Management Comments section of this report). EEOI will work with procurement staff to determine what is missing from the contract file and provide responsive documentation. EEOI estimated completion of the contract file by September 30, 2020.

OIG Response

The OIG finds the planned actions responsive to our recommendation.

MANAGEMENT COMMENTS

Memorandum

Farm Credit Administration
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July 24, 2020

To: Sonya Cerne, Assistant Inspector General for Audits, Inspections, and Evaluations
FCA Office of Inspector General

From: Thais E. Burlew, Director *TB*
FCA Office of Equal Employment Opportunity and Inclusion

Subject: Management's response to Office of Inspector General draft inspection report on implementation efforts for the 2017-2018 Fairness and Inclusiveness Assessment

This memorandum responds to the draft inspection report from the Office of Inspector General (OIG) dated July 10, 2020, and titled FCA's Implementation Efforts for the 2017-2018 Fairness and Inclusiveness Assessment.

FCA remains committed to promoting and supporting a diverse and inclusive work environment that provides our employees the chance to achieve their full potential in the pursuit of our mission.

Because of this commitment, we were ranked as follows in 2019:

- First among small federal agencies and second governmentwide for our support of diversity
- In the top five among small agencies for best places to work in the federal government

Our rating for diversity has steadily increased since 2015, in part because of our efforts to engage leaders, provide special emphasis programs, and recognize employees.

Engaging leaders: The board continues to demonstrate its commitment to diversity and inclusion. The board members reaffirmed our policy statement supporting diversity and inclusion internally and externally. They regularly participate in special program events, often delivering remarks at these events to underscore their support. The board also ensures that funds and other resources are available to carry out diversity and inclusion initiatives.

Providing robust special emphasis programs: We have seven special emphasis programs (SEPs) that take an active role in training, recruiting, and providing feedback to

management on diversity and inclusion topics. Here are just a few examples of their contributions:

- Arranged an interview with the late Congressman John Lewis during Black History Month
- Invited Congressman Pedro Pierluisi to deliver remarks to the agency during Hispanic Heritage Month
- Sponsored a networking and mentoring series to support FCA women
- Advocated for changes in work-life programs that have been implemented by the agency

These are simply highlights; all the agency's special emphasis programs have sponsored informative events and advocated for positive changes in the agency.

Recognizing employees: Each year we ask employees to nominate colleagues for the Diversity Leadership Award. The purpose of the award is to recognize individuals who have demonstrated a significant commitment to enhancing diversity and inclusion at our agency. It shows the importance leadership places on fostering a culture of diversity and inclusion.

The assessment report

We agree with the recommendation in the OIG inspection report that we need to better communicate about the agency's diversity and inclusion program. However, the assessment and the resulting report do have two important limitations.

First, although the information gathered during the assessment is very valuable, the assessment process was not a formal audit or an inspection of the agency's diversity and inclusion practices. The thoughts and insights provided in the assessment report are based mainly on a survey of agency staff, interviews of selected individuals, and input from focus groups.

Second, many of the recommendations staff offered during the assessment already existed as agency procedures and practices. Our discovery that some employees were unfamiliar with existing procedures and practices prompted a conversation within the agency about the need for better communication with staff on FCA's diversity and inclusion efforts.

Examples of communication initiatives in response to the assessment

Responding to a desire many employees expressed in the assessment report to have more access to the agency's senior leaders, we launched "town hall" meetings where staff could talk with the board and senior staff.

In response to requests for additional training and leadership opportunities, the SEPs have begun to tailor their programs to meet this demand. For example, the Federal Women's Program Committee used the assessment information to develop a presentation with insights on how staff members can "be the change," which included highlights from the "Women at Work" podcast series by the Harvard Business Review.

These are just two examples of several initiatives we have undertaken in response to the assessment.

Documentation initiative in response to the assessment

As we evaluated and began addressing the recommendations in the assessment report, we realized we needed a formal tracking system. At the time of the OIG inspection, we were developing this system, which — when completed — will capture all the agency's diversity and inclusion efforts. Our plan is to use the tracking system to establish accountabilities and timeframes and to provide reports to management and updates to staff.

At the time of the OIG inspection, however, the tracking site was incomplete: we had not yet input actions taken or addressed preliminary priority levels. As a result, the OIG incorrectly concluded that the recommendations had been "tabled." That was not the case. In fact, some of the recommended actions have already been in practice for many years. We simply had not yet had the opportunity to enter them into the tracking system.

Following are just two examples of the recommended actions that the agency has been doing for years.

Holding all FCA employees accountable for diversity and inclusion. All annual performance appraisals include a diversity element. In addition, all employees must take periodic training in diversity and inclusion, with content determined by their position in the agency. For example, all employees receive antiharassment training, whereas training in developing reasonable accommodation is reserved for supervisors. As part of onboarding, all new employees are provided training in diversity and inclusion. Staff can also choose to take advantage of monthly training opportunities in diversity and inclusion (e.g., January, "Unconscious Bias"; March, "How Diversity Makes Teams More Innovative"; June, "Leading Inclusively"). Ad hoc training is also offered. For example, the agency has offered a webinar series on enhancing self-awareness, as well as coach/mentor training through ACT Leadership.

Attracting applicants from minority-serving institutions and diverse professional groups. FCA has sought to identify and build long-term relationships with minority-serving institutions and diverse professional groups so that we can attract applicants from these institutions and groups. Initiatives include the following:

- Every year FCA staff attend career fairs at historically Black colleges and universities and Hispanic-serving institutions.
- We conduct outreach and recruiting at other types of institutions such as those with high minority enrollment, those that are "military friendly," and institutions that serve Asian-Pacific Americans and Native Americans.
- We have engaged our SEPs to reach out to student organizations, professors, and others and to form partnerships to increase the diversity of the applicant pool. For example, members of the Federal Women's Program Committee gave presentations at clubs and for programs at the University of California, Davis, and California State University, Sacramento, and are exploring targeting coed business and women-in-business groups. Members of the Hispanic Organization for Leadership and Advancement (HOLA) have reached out to Hispanic students at select universities in an effort to increase the diversity of the applicant pool for FCA jobs.

- Staff who are alumni of minority-serving institutions maintain relationships with their schools and actively reach out to deans and professors on campus.
- We use an online recruiting tool that enables us to post our job announcements on a website that connects with more than 150 minority-serving institutions, historically Black colleges and universities, Hispanic-serving institutions, and women's colleges, as well as student diversity groups.

We continue our efforts to refine our outreach to diversify our applicant pool.

Response to OIG recommendations

The recommendations in the OIG inspection report to address the Ivy Planning Group's recommendations further emphasize the benefits of increased documentation and communication. We thank the OIG for underlining the need to document the agency's work in increasing diversity and inclusion, which will help us better promote our achievements, communicate with staff about diversity and inclusion, and identify areas to improve.

However, we believe the inspection report does not fully portray what the agency was already doing before the assessment or what it has done since the assessment to implement recommendations. Nevertheless, we agree that documenting our actions and communicating to staff could be improved as we continue to make progress in our diversity and inclusion efforts, guided by the assessment report. We will follow the OIG's recommendations, which are consistent with our ongoing efforts and which will enable us to capture and report on our efforts to date.¹

As our employees have noted through external surveys, we are committed to diversity and inclusion and providing our employees the environment to work to their full potential in the pursuit of our mission.

¹ The inspector general's fifth recommendation, along with the others, will be addressed in the IG tracking system but was not the primary focus of this management response.

OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of this inspection was to analyze FCA's implementation of diversity and inclusion efforts. We conducted the inspection at FCA's headquarters in McLean, VA from January-July 2020. The scope of this inspection was limited to FCA's 2017-2018 Fairness and Inclusiveness Assessment.

We took the following steps to accomplish the objective:

- Identified and reviewed applicable regulations, policies, and procedures related to the objective.
- Reviewed prior reviews related to the inspection objective.
- Interviewed the Director of EEOI and personnel from OAS and OE with significant responsibilities related to implementation efforts associated with FCA's fairness and inclusiveness assessment.
- Requested and reviewed plans, timelines, supporting documentation, and tracking documentation related to the assessment.
- Analyzed information in the tracking site, including start dates, status documentation, responsible officials, and priorities.
- Reviewed the contract file for the assessment, including requirements, evaluation, and selection documentation.

This inspection was performed in accordance with the Council of the Inspectors General on Integrity and Efficiency's Quality Standards for Inspection and Evaluation. These standards require that we plan and perform the inspection to obtain sufficient, competent, and relevant evidence that supports a reasonable basis for our findings, conclusions, and recommendations. We assessed internal controls and compliance with laws and regulations to the extent necessary to satisfy the objective. Because our review was limited, it would not necessarily have disclosed all internal control deficiencies that may have existed at the time of our inspection. We assessed the information and data collected during the inspection and determined it was sufficiently reliable and valid for use in meeting the inspection objective. We assessed the risk of fraud related to our inspection objective while evaluating evidence. Overall, we believe the evidence obtained is sufficient to provide a reasonable basis for our findings and conclusions based on the inspection objective.

APPENDIX A- ASSESSMENT RECOMMENDATIONS

FCA's 2017-2018 Fairness and Inclusiveness Assessment included the following recommendations:

1. Develop a communications plan including:
 - Continue to celebrate and highlight FCA's ranking as a best place to work, highlighting all programs and resources that support employees and how to access and use them.
 - Communicate findings and recommendations from all studies, including this one.
 - Increase Board and senior leadership interaction with staff (e.g. Town Halls, reverse mentoring, matrix mentoring, regular trips to field office locations).
 - Increase transparency in senior leadership decision-making such as communicating the ways in which employee input was considered, the "why" behind the decision, and sharing weekly meeting notes (as appropriate); communicate priority decisions via face-to-face methods in addition to written communications.
 - Provide sample follow-up, trigger questions for Board and leadership to ask when discussing decisions with Directors and below.
 - Develop an "assessing decisions with a diversity and inclusion lens" tool for the Board, leaders, managers, and supervisors to apply during decision-making.

2. Further define diversity and inclusion expectations such as:
 - Require all surveys and data collection to disaggregate results by race and gender demographics (at a minimum). To protect survey participants' anonymity, don't compute or report results for any subgroup with fewer than 10 members. Review and develop targeted strategies to close gaps or inequities.
 - Set expectation that leaders, managers, and supervisors take risks on younger employees when delegating tasks, identify and develop emerging leaders, and focus on communicating institutional knowledge; hold leadership, managers, and supervisors accountable.
 - Create a task force to review and develop recommendations to ensure FCA's performance management system, performance goals, technology, resources, and job descriptions support the goal of work/life balance along with mission success. This task force should include representatives from leadership and from each Special Emphasis Program (SEP), so that leadership and SEPs are working in partnership to update performance management at the agency.

3. Build capacity to value diversity and demonstrate inclusive behaviors, such as:
 - Hold supervisor roundtables, by managerial level, to share diversity and inclusion best practices and solve diversity and inclusion challenges.
 - Provide coaches for Board and leadership focused on creating and leading diverse and inclusive environments.

- Provide coaches for managers struggling to create and manage diverse teams and inclusive environments.
 - Train Examiners-in-Charge/managers on having difficult conversations, giving feedback, building relationships across difference, unconscious bias, and subtle behaviors of exclusion.
 - Identify opportunities for cross-training, rotational assignments, and/or collateral assignments.
 - Establish mentoring for people new to management roles.
4. Establish a Generations Special Emphasis Program to:
 - Help bridge the generation gap; create connections
 - Support institutional knowledge transfer
 - Develop any knowledge, skill, and ability deficiencies that are perceived to be hinderances to younger generations getting opportunities.
 5. Enhance reward and recognition program, such as:
 - Including recognition for individuals who stepped in to cover people on special assignments.
 - Ensuring principles of diversity and inclusion are integrated into award and recognition (e.g. someone cannot be recognized as a best performer, if he/she has demonstrated anti-diversity and inclusion behaviors).
 6. Acknowledge and address historical challenges with diversity at FCA
 - Conduct diversity dialogues with mix of race, gender, level, etc. staff to discuss past and current harms experienced, diversity and inclusion myths and misconceptions, capacity for forgiveness, and what amelioration and moving forward looks like.
 - Develop Frequently Asked Questions about diversity and inclusion, addressing the myths and misconceptions and add final to communications plan (see recommendation #1)
 7. Hold all FCA employees accountable for diversity and inclusion.
 - Get an answer to “what will happen when a star performer behaves in a way that violates diversity or inclusion principles?” from Board and senior leadership.
 - Review, update (as necessary based on answer to question above), and communicate disciplinary procedures to address individuals who display anti-diversity and inclusion behaviors. Invite the EEO Director to review procedures with input from SEP managers. Add final to communications plan (see recommendation #1).
 - Create list of specific diversity and inclusion behaviors and actions (e.g., providing instant, open and honest feedback) and conduct a 360 assessment for leaders and managers; hold leaders and managers accountable for developing an action plan to address any performance gaps.
 - Diversity dialogues and facilitation services for the purpose of helping work groups have open, even if uncomfortable, conversations about diversity and inclusion.

- Increase weight of diversity and inclusion metric in performance evaluations; set clear expectations for this factor that go beyond simply attending SEP events.
8. Clarify and communicate definitions of EEO, Affirmative Action, and diversity and inclusion.
 - Develop a FCA-specific definition of diversity and inclusion and include in all key FCA documents (e.g., Human Capital Plan, Strategic Plan, Diversity and Inclusion Plan), FCA website (EEO and Diversity tab), and applicable policies.
 - Separate EEO and Diversity into separate tabs on FCA's website.
 - Create separate sections for EEO and diversity and inclusion in all key documents and when communicating to staff; add final to communications plan (see recommendation #1)
 - Update language in documents to clarify when FCA means specifically race and gender diversity.
 9. Distinguish between preferences versus requirements.
 - Conduct job analysis to determine whether criteria are requirements or preferences. Assess whether each criterion is so non-negotiable that FCA/OE would be willing to bypass a superstar who doesn't meet that criterion. If not, the criterion is a preference. For example, if an undergraduate degree in accounting or finance is currently required, is this requirement supported by job analysis as essential? Are any other majors closely-related enough to serve as substitutes? What about candidates who have advanced degrees- such as a Master of Business Administration- would their undergraduate majors still be important? Clarify, codify, and standardize selection criteria.
 - Ensure that OE's decision criteria- formal and informal- are bias free and are used in a consistent manner, to give women and people of color their fair share of high-visibility opportunities.
 - Implement Individual Development Plans (IDPs) agencywide. Provide detailed guidance on IDP implementation, focused on open and honest feedback, resources, actions to improve performance, and consistent implementation across team members.
 10. Identify Historically Black Colleges and Universities (HBCUs), Hispanic Serving Institutions (HSIs), American Indian Higher Education Consortium (AIHECs) institutions and diverse professional groups that FCA/OE will commit to building long-term relationships with, and develop plan to achieve a high yield of applicants, including:
 - Develop relationships with career counselors, Deans, and professors to build a pipeline of entry-level candidates; communicate FCA/OE's ideal candidate profile so that they can begin recruiting on the organization's behalf.
 - Consider selecting a few HBCUs, HSIs, and/or AIHECs with which to develop substantial partnerships that include developing FCA/OE specific curriculum elements or modules to be included as part of their AgBusiness and AgEconomic courses.

- Outline regularly scheduled meetings and activities to perform on campus with students and diverse campus organizations.
 - Identify and develop relationships with diverse professional groups that meet FCAs/OE requirements and leverage online sources to build a pipeline of mid-career/experienced candidates (e.g. Veteran career fairs, LinkedIn).
 - Update recruiting material to highlight finance and credit backgrounds.
11. Develop opportunities for leadership and staff to build relationships across difference.
- Try “Five Cups of Coffee” in which a Board member or leader schedules coffee with small groups of staff.
 - Develop informal communication channels for staff to reach out to leaders (e.g., At a large financial institution any employee can request a “pull-up” with leadership; a pull-up is an informal meeting, usually over coffee in the café. No agenda is needed but should be a pointed conversation with a goal in mind).
12. Better position HR, EEOI, and SEPs to achieve diversity and inclusion goals.
- Create regular touchpoints between OE and HR and EEOI to develop and implement OE’s human capital processes. For example, include HR or EEOI staff on panels that conduct interviews and make hiring and promotion decisions. Involve HR/EEOI in data tracking and review, for example, to increase accountability and transparency regarding career development and advancement opportunities across demographic differences.
 - Increase transparency, communication, roles/responsibilities, and accountability related to the agency’s diversity and inclusion goals.
 - Update SEP goals and charters to include a strategic mission enabler; reflect the inclusion of activities that advance the FCA mission and staff development needs to achieve the mission (e.g., SEPs should identify actions and activities to close gaps and execute recommendations outlined in this report). Because it is notoriously difficult to fit internal networking and development opportunities into busy work days, some structure helps these connections happen. With a “Five Cups of Coffee” program, Board members and senior leaders could schedule five specific hours, over the course of a few months, during which they invite any staff member to join them for coffee and casual conversation. Leaders can volunteer for time slots and employees can simply sign up and attend. Be sure to include some senior-leader field visits in the plans, and/or find creative ways to invite virtual participation. If such a program is well-received, offer it on a regular (e.g. annual) basis, rather than having it be just a one-off experiment.
13. Use the opportunity of the retirement wave to recruit from diverse pools of candidates for open senior positions.
- Substantially increase recruiting efforts; involving diverse leadership and staff in on-campus and professional recruiting activities.

- Recruit internally and encourage applicants to apply for promotions; strive to have a diverse slate of candidates that reflect the civilian labor force (CLF) and federal civilian workforce.
14. Identify surrogate data analysis techniques to analyze decisions and outcomes across the employee life cycle, from recruiting to separation, given FCA's small numbers. For example:
- Conduct adverse impact analysis (use the 80% rule instead of, or along with, statistical significance testing).
 - Aggregate data over several years (e.g. analyze promotion rates across demographics for the last five years).
 - Capture and analyze applicant flow data, to pinpoint where candidates exit the process from first recruiting contact to hire.
15. Use SEPs to operate as surrogate cadres of like groups to connect, network, support, and share and learn from each other's experiences; update SEP charters to reflect this goal.
- Currently, FCA's SEPs are known almost exclusively for cultural celebrations, awareness, and one-off events. SEPs can do much more to create value for the agency and its employees (see ideas below).



Farm Credit Administration
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