



DEPARTMENT OF THE NAVY  
COMMANDER, NAVY RESERVE FORCE  
1915 FORRESTAL DRIVE  
NORFOLK VA 23551-4615

COMNAVRESFORINST 1604.1  
N00CP  
25 Jan 2022

COMNAVRESFOR INSTRUCTION 1604.1

From: Commander, Navy Reserve Force

Subj: BARRIER ANALYSIS AND IDENTIFICATION

Ref: (a) Management Directive 715  
(b) Civilian Human Resources Manual, Subchapter 1604  
(c) 29 Code of Federal Regulations § 1614.101 and 1614.102

Encl: (1) Equal Employment Opportunity Commission Agency Self-Assessment Checklist

1. Purpose. To provide guidance and requirements to individuals responsible for implementing, coordinating, and conducting barrier analysis efforts to identify and eliminate any impediments to equality of opportunity regarding employment in the workplace within Commander, Navy Reserve Force (COMNAVRESFOR) per references (a) through (c). All commands must regularly evaluate their employment practices to identify barriers to equality of opportunity for all individuals. Employment practices cover the processes of recruitment, employee development and advancement, performance management, discipline, and retention. Where such barriers are identified, commands must take measures to eliminate them. Only through these efforts will it be ensured that all individuals are provided opportunities to participate in the full range of employment opportunities and achieve their fullest potential.

2. Background.

a. Reference (a) establishes the ongoing obligation for agencies to conduct an annual assessment of their Equal Employment Opportunity (EEO) programs. There are two aspects of an (EEO) Program that must be addressed during a self-assessment.

(1) The first element is a self-assessment of the command's EEO program measured against the six essential elements of a model EEO program using the Equal Employment Opportunity Commission (EEOC) Agency Self-Assessment Checklist provided in enclosure (1).

(2) The second element of the self-assessment process is a snapshot of the status of command efforts to identify and eliminate any barriers to EEO. Barrier identification and elimination is the process by which commands uncover, examine and remove barriers to equal participation at all levels of the workforce. A barrier is an agency policy, principle or practice that limits or tends to limit employment opportunities for members of a particular sex, race, or ethnic background, or based on an individual's disability status.

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b. Reference (a) provides 28 Workforce Data Tables to assist commands in the examination of their workforce racial, national origin, gender and disability profiles; the first step of the barrier analysis process. Reference (a) also provides guidance and a specific format, i.e., EEOC Form 715-01 PART I, for commands/activities to document their barrier analysis efforts and plans to eliminate any identified barriers.

### 3. Policy

a. Per references (a) through (c), COMNAVRESFOR will identify and eliminate barriers that impede free and open competition in the workplace and prevent individuals of any race, national origin group, either sex, or individuals with a disability from realizing their full potential.

b. All COMNAVRESFOR civilian employees and their supervisors will work towards the goal of creating an inclusive work environment where qualified applicants and employees have the freedom and opportunity to compete and participate in all applicable employment processes, e.g., recruitment, employment, promotion, training, awards, etc.

c. In order to achieve this goal, focused, methodical and on-going efforts to identify and eliminate any barriers to equality of opportunity must be developed and implemented at all levels of COMNAVRESFOR.

### 4. Responsibilities

a. COMNAVRESFOR Commanders and Commanding Officers serve as the Equal Employment Opportunity Officer (EEOO) for their organizations and are responsible for:

(1) Communicating and demonstrating their commitment to equality of opportunity for all employees and applicants for employment.

(2) Recognizing potential barriers and designating a senior level manager(s) to execute and coordinate all barrier analysis efforts with the activity, or consulting with a higher level command to conduct the barrier analysis.

(3) Ensuring that officials responsible for barrier identification and elimination obtain trained on program requirements.

(4) Ensuring that EEO professionals are involved with and consulted on the management and deployment of human resources.

(5) Evaluating managers and supervisors on efforts to ensure equality of opportunity for all employees.

b. COMNAVRESFOR Director of EEO (DEEO) is responsible for:

(1) Serving as the primary advisor to the DEEO on the command's process for conducting regular internal audits, on at least an annual basis, to assess whether the activity has made a good faith effort to identify and eliminate barriers to equality of opportunity.

(2) Working collaboratively with senior level manager(s) at all component levels, COMNAVRESFOR Director, Civilian Human Resources (DCHR) and echelon IV Readiness and Mobilization Command (RMC) Assistant Chief Staff Officers (ACSO) in executing COMNAVRESFOR barrier analysis efforts.

(3) Providing guidance, assistance, and training on barrier identification and elimination to individuals responsible for developing, coordinating and implementing the activity's barrier analysis efforts.

(4) Ensuring that barrier analysis efforts continue on an ongoing basis and involving appropriate stakeholders in this process.

c. COMNAVRESFOR EEO Specialists are responsible for:

(1) Serving as Special Emphasis Program (SEP) Managers to assist with enhancing the employment, training, and advancement of minority groups, women and/or individuals with disabilities by assisting, supporting and participating in the activity's barrier analysis efforts.

(2) Working collaboratively with senior level manager(s), COMNAVRESFOR Civilian Human Resources (N00CP) staff, and Echelon IV ACSOs in executing COMNAVRESFOR barrier analysis efforts.

(3) Access and analyze Work-Force data tables for COMNAVRESFOR to assist with barrier analysis efforts

d. COMNAVRESFOR Director, Civilian Human Resources Director (DCHR) is responsible for:

(1) Serving as the civilian human resources advisor to assist with identifying and eliminating barriers to equality of opportunity.

(2) Working collaboratively with senior level manager(s) and the COMNAVRESFOR EEO Office in exercising COMNAVRESFOR barrier analysis efforts.

(3) Ensuring Human Resources (HR) Specialists are knowledgeable on and participating in, as needed, the activity's barrier analysis efforts.

(4) Establishing a viable communication exchange between the COMNAVRESFOR EEO Office, key management officials and other applicable stakeholders to review policies and procedures, in an effort to identify and eliminate barriers to equality opportunity.

e. COMNAVRESFOR RMC echelon IV ACSOs are responsible for:

(1) Serving as the direct point of contact to assist with identifying and eliminating barriers to equality of opportunity for their assigned RCC their respective echelon V commands.

(2) Working collaboratively with senior level manager(s), COMNAVRESFOR EEO Office and Civilian Human Resources (N00CP) in executing COMNAVRESFOR barrier analysis efforts.

(3) Reviewing assigned workforce data tables and other information pertinent to equal employment in the areas of placement, policies and procedures, training opportunities, upward mobility and incentive awards etc., on an annual basis, or as needed to assist with identifying and eliminating barriers to equality of opportunity.

(4) Establishing a viable communication exchange between the COMNAVRESFOR EEO Office, key management officials and other applicable stakeholders to review policies/procedures, in an effort to identify and eliminate barriers to equality opportunity.

f. COMNAVRESFOR Managers and supervisors are responsible for:

(1) Assisting, supporting and participating in the COMNAVRESFOR barrier analysis efforts.

(2) Maintaining and executing clearly defined, well-communicated, consistently applied and fairly implemented civilian human resources policies, including selection and promotion procedures, evaluation procedures, rules of conduct and training systems.

g. COMNAVRESFOR Employees and or other stakeholder are responsible for assisting, supporting and participating in COMNAVRESFOR barrier analysis efforts as applicable.

5. Data and Trend Analysis. Per reference (a), a review of the EEOC MD-715 Workforce Data Tables will be conducted by the COMNAVRESFOR EEO Department and the echelon IV ACSO annually to assist in the review of the COMNAVRESFOR workforce, as generally compared to appropriate comparators, to identify possible triggers. The EEOC Workforce Data Tables will be used as one source of data to identify triggers to be explored. A trigger is a situation or a 'red flag' that indicates the possible existence of a barrier to equal opportunity. The end result of the data analysis is to gather enough information to identify problem areas that may indicate the existence of potential barriers to EEO. The problem areas identified by an analysis of the data are not the barriers to equality of opportunity, but are a symptom of a problem that needs to be addressed.

6. Employment Processes. Per reference (a), the COMNAVRESFOR DEEO and COMNAVRESFOR DCHR, on a regular recurring or as needed basis, will conduct an examination of COMNAVRESFOR civilian programs, policies and procedures for different employment processes to include: Recruitment, Hiring/Placement, Employee Development and Training Opportunities, Promotions and Other Internal Selections, Award Distribution, Discipline and Separations to ensure there are no barriers to equal employment opportunity.

a. Other employment processes that may be considered for examination include, but are not limited to:

- (1) Performance rating procedures
- (2) Advertisement and selection for reassignment opportunities
- (3) Honorary awards
- (4) Comparison of pay rates between males/females performing substantially similar work
- (5) Command/activity level career development programs

b. Other Relevant Data that may be considered as part of the barrier analysis may include, but is not limited to:

- (1) Discrimination complaint activity (formal, informal, contacts)
- (2) More detailed information on accessions, promotions and separations, i.e., name of employee, organizational code, pay plan, series, grade, gender, Ethnicity and Race Indicator (ERI) code, handicap code, EEOC job category, nature of action description, nature of action code, authority code, entry date, effective date, veterans' preference (NOTE: this information is covered under the provisions of the Privacy Act and must be safeguarded and used for official use only)
- (3) Organizational environment, e.g., hiring freeze, BRAC activity, downsizing efforts, fiscal constraints, increased hiring efforts, etc.
- (4) Exit survey results
- (5) Input from Special Emphasis Groups
- (6) Input from Union Official
- (7) Input from employees, to include supervisors and managers

(8) Input from Human Resources practitioners

(9) Government reports, e.g., EEOC, GAO, OPM, MSPB, DOL, etc.

c. Data obtained from the workforce data tables, workforce analysis, employment processes analyses, stakeholders, government reports, etc. will be analyzed in totality and put in the proper context to narrow and focus barrier identification efforts. At a minimum, data and barrier analysis will be based on data through the end of 3<sup>rd</sup> quarter i.e., 30 June.

7. Documentation of Barrier Analysis Efforts. The command's complete barrier analysis efforts should be documented in writing, even if the analysis does not result in the identification of a barrier to EEO, and include the following:

a. Sources of information, e.g., EEOC MD-715 workforce data tables, trends analysis, government studies, etc.

b. Summary of findings.

c. Basis for findings.

d. Recommended actions for the elimination of the identified barrier.

This documentation will be maintained as part of the working documents used to support and prepare the COMNAVRESFOR Annual EEO Program Status Report. This documentation will also be used by the COMNAVRESFOR EEO Department to simplify the process of completing EEOC Form 715-01, Part I, EEO Plan to Eliminate Identified Barrier, for the annual assessment report to document plans for improvement, overall objectives for barrier elimination, with corresponding action items, identify responsible personnel and target dates, after all available source materials have been analyzed, potential barriers thoroughly investigated and specific barriers are identified.

The EEO Office will document and track the COMNAVRESFOR plan and discuss any questions or matters pertaining to the barrier analysis results and action items within the scope of the program and make recommendations to Director of Civilian Human Resources (DCHR), senior level management and other stakeholders, concerning eliminating barriers and practices that impede equal opportunity and to promote effective affirmative action practices for all employees and applicants for employment.

8. Action. Managers, supervisors, and employees shall take necessary actions to conduct barrier analysis throughout COMNAVRESFOR in accordance with the provisions outlined in this instruction and references (a) through (c).



9. Review and Effective Date. Per OPNAVINST 5215.17A, COMNAVRESFOR will review this instruction annually on the anniversary date of its effective date to ensure applicability, currency, and consistency with Federal, Department of Defense, SECNAV, and Navy policy and statutory authority using OPNAV 5215/40 Review of Instruction. This instruction will automatically expire 5 years after effective date unless reissued or canceled prior to the 5-year anniversary date, or an extension has been granted.



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By direction