



Memorandum from the Office of the Inspector General

August 23, 2017

Christopher R. Carlson, LP 3A-C

**REQUEST FOR FINAL ACTION – EVALUATION 2016-15445-03 – TALENT
ACQUISITION AND DIVERSITY'S ORGANIZATIONAL EFFECTIVENESS**

Attached is the subject final report for your review and final action. Your written comments, which addressed your management decision and actions planned or taken, have been included in the report. Please notify us when final action is complete. In accordance with the Inspector General Act of 1978, as amended, the Office of the Inspector General is required to report to Congress semiannually regarding evaluations that remain unresolved after 6 months from the date of report issuance.

If you have any questions or wish to discuss our findings, please contact Amy R. Rush, Evaluations Manager, at (865) 633-7361 or Lisa H. Hammer, Director, Evaluations – Organizational Effectiveness, at (865) 633-7342. We appreciate the courtesy and cooperation received from your staff during the evaluation.

David P. Wheeler
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Attachment

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OIG File No. 2016-15445-03



Office of the Inspector General

Evaluation Report

To the Director, Talent
Acquisition and Diversity

TALENT ACQUISITION AND DIVERSITY'S ORGANIZATIONAL EFFECTIVENESS

Evaluation Team
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Evaluation 2016-15445-03
August 23, 2017

ABBREVIATIONS

CHRO	Chief Human Resources Office
D&I	Diversity and Inclusion
EEO	Equal Employment Opportunity
EEOC	Equal Employment Opportunity Commission
ERG	Employee Resource Group
FY	Fiscal Year
HR	Human Resources
HRG	Human Resources Generalist
SPP	Standard Programs and Processes
TAD	Talent Acquisition and Diversity
TVA	Tennessee Valley Authority
U.S.	United States

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Evaluation 2016-15445-03 – Talent Acquisition and Diversity’s Organizational Effectiveness

EXECUTIVE SUMMARY

Why the OIG Did This Evaluation

Organizational effectiveness, as defined in this evaluation, is the ability of an organization to achieve its mission and goals. To achieve and sustain organizational effectiveness, there should be alignment between strategy, team engagement, and operational performance. Specifically, values and behaviors that drive good performance should be embedded throughout the organization’s business processes and exemplified by the individuals that manage and work in the organization. The Tennessee Valley Authority’s (TVA) 2017 3-year Enterprise Risk Profile recognized ongoing workforce refinementⁱ might negatively affect the performance environment. Therefore, employee engagement is critical.

Due to the importance of alignment between strategy, team engagement, and operational performance, the Office of the Inspector General is conducting organizational effectiveness evaluations of business units across TVA. In support of TVA’s mission and performance risk mitigation efforts, TVA’s Chief Human Resources Office (CHRO) is responsible for “fostering an environment that enables all employees to contribute at optimum levels through connections to each other and to TVA’s mission.” Talent Acquisition and Diversity (TAD), an organization within CHRO, assists with workforce optimization and furthers fostering an engaged workforce through activities conducted by its departments. This evaluation assesses strengths and risks that could impact TAD’s effectiveness.

What the OIG Found

We identified strengths within TAD related to (1) organizational alignment, (2) collaboration, (3) support from TAD management, and (4) department morale and ethics. However, we also identified potential risks that could negatively affect the achievement of the mission. These risks include (1) the potential for increased noncompliance risk due to (a) the use of social media in the recruitment process and (b) no documentation requirements for hiring interns, (2) talent acquisition process inefficiencies, and (3) the potential for ineffective inclusion metrics and programs.

Based on our findings and using TVA’s Business Operating Model, we assessed TAD’s level of risk in the areas of alignment, engagement, and execution. As shown in Table 1 on the following page, we determined alignment risk to be low because of the cascading and aligned goals of management and personnel within TAD as well as the alignment of TAD business unit responsibilities and initiatives to those goals. Furthermore,

ⁱ Refinement of the workforce includes activities such as reduction in force.



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TAD business unit responsibilities and initiatives supported the CHRO mission. We also assessed engagement as low risk. Our interviews disclosed that TAD personnel had support from their direct supervisors, which included holding employees accountable, providing the tools they need, and being receptive to differing opinions. Furthermore, individuals also cited collaboration, morale, and ethics within TAD departments as positive attributes. Finally, we rated execution risk as medium due to (1) the potential for increased noncompliance risk in the recruitment and selection processes, (2) inefficiencies in the talent acquisition process, and (3) the potential ineffectiveness of inclusion metrics and programs. While execution was ranked as a medium risk, there is potential for this risk to decrease with the implementation of the fiscal year 2017 initiatives related to the redesign of the talent acquisition process.

	Low Risk	Medium Risk	High Risk
Alignment	x		
Engagement	x		
Execution		x	

Table 1

What the OIG Recommends

We recommend the Director, TAD:

1. Develop a policy or guideline to define (a) social media pipeline and recruitment activities, including social media sites searched and the relevant and objective search criteria used, and (b) expectations of hiring managers with regard to social media usage in the hiring process. Require record retention of social media searches conducted for potential applicants.
2. Implement controls over the intern hiring process, including documentation retention of criteria used for intern candidate selection and evaluation results.
3. Continue with plans to (a) update the Standard Programs and Processes related to applying Veteran’s Preference and (b) limit direct selection usage.
4. Continue with plans to address the inclusion of individuals based on characteristics other than those represented in the Employee Resource Groups and expand the diversity and inclusion metrics to obtain a more comprehensive view of inclusion within the organization.



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TVA Management’s Comments

TVA management generally agreed with the recommendations related to social media usage, controls over the intern process, continuing with plans to update the Standard Programs and Processes related to Veteran’s Preference, and limiting direct selection usage. However, TVA management did not agree with the recommendation related to expanding the diversity and inclusion metrics because they believe there is a collaborative monitoring approach with other TVA organizations. TVA management also provided comments related to the content of the draft report that we incorporated as appropriate. Descriptions of TAD departments and programs were summarized based on TVA documentation; therefore, not all TAD suggestions were incorporated into the background of this report. See Appendix B for TVA management’s complete response.

Auditor’s Response

We disagree with TVA management’s inaction related to the expansion of TAD diversity and inclusion metrics. Data examined by TAD personnel contained fluctuations in respectful workplace incidentsⁱⁱ from the current year to the prior year rather than fluctuations across multiple time periods. Trending employee grievance data, such as equal employment opportunity complaints and employee concerns, and the inclusion index over time could allow TAD personnel to more effectively (1) monitor the inclusion culture across TVA and within TVA organizations and (2) assess the effectiveness and sustainability of TAD programs designed to build and maintain an inclusive workforce.

ⁱⁱ According to TVA’s Leader Handbook, this includes incidents involving inappropriate behavior that are to be reviewed on a quarterly basis so common themes and repetitive problem areas may be identified.

BACKGROUND

Organizational effectiveness, as defined in this evaluation, is the ability of an organization to achieve its mission and goals. To achieve and sustain organizational effectiveness, there should be alignment between strategy, team engagement, and operational performance. Specifically, values and behaviors that drive good performance should be embedded throughout the organization's business processes and exemplified by the individuals that manage and work in the organization.

In recent years, the Tennessee Valley Authority (TVA) has faced internal and external economic pressures and implemented cost-cutting measures in an attempt to keep rates low and reliability high while continuing to fulfill its broader mission of environmental stewardship and economic development. In addition to recognizing operational risks related to those pressures, TVA's 2017 3-year Enterprise Risk Profile recognized ongoing workforce refinement¹ might negatively affect the performance environment. Therefore, employee engagement is critical.

Due to the importance of alignment between strategy, team engagement, and operational performance, the Office of the Inspector General is conducting organizational effectiveness evaluations of business units across TVA. In support of TVA's mission and performance risk mitigation efforts, TVA's Chief Human Resources Office (CHRO) is responsible for "fostering an environment that enables all employees to contribute at optimum levels through connections to each other and to TVA's mission." Specifically, the CHRO's key initiatives for fiscal year (FY) 2017 are to:

- Optimize the workforce in order to support nonfuel Operations and Maintenance reductions.
- Foster a work environment where employees are fully engaged.
- Build individual, leadership, and organizational capabilities.
- Leverage human resources (HR) technology to enhance employee efficiencies.

The CHRO is comprised of five organizations, including HR Business Office and Ombudsman; Learning, Growth, and Management; Talent Acquisition and Diversity (TAD); Compensation and Benefits; and HR.² The TAD organization, the focus of this report, assists with workforce optimization and furthers fostering

¹ Refinement of the workforce includes activities such as reduction in force.

² Separate reports have been or will be completed for each of the five organizations within the CHRO:

- Evaluation Report 2016-15445-01, HR Business Office and Ombudsman, May 18, 2017.
- Evaluation Report 2016-15445-02, Learning, Growth, and Management, May 18, 2017.
- Evaluation Report 2016-15445-03, TAD.
- Evaluation Report 2016-15445-04, Compensation and Benefits, June 29, 2017.
- Evaluation Report 2016-15445-05, HR.

an engaged workforce through activities conducted by its departments. TAD consists of the following two departments:

- The Talent Acquisition department is responsible for generating a diverse pipeline of talent,³ recruiting qualified candidates, and filling jobs within TVA based on merit and efficiency. TAD personnel must carry out these responsibilities in accordance with antidiscrimination laws, such as Title VII of the Civil Rights Act of 1964, which prohibits employers from discriminating against employees based on protected characteristics such as race, color, religion, sex, or national origin. While TAD personnel cannot violate antidiscrimination laws by selecting individuals based on protected characteristics, recruiters, known as talent acquisition consultants, may focus on increasing the number of protected class applicants through special recruiting efforts in order to present a diverse slate of eligible candidates for management to consider in the selection process as part of TVA's affirmative employment plan.⁴ This includes attending events at universities and using social media to connect with individuals who might be interested in positions at TVA.

When filling positions, talent acquisition consultants post positions internally and/or externally, screen candidates by comparing resumes to job requirements, and identify potential candidates for hiring managers to interview. Part of this identification includes determining whether (1) the applicant is a United States (U.S.) citizen or meets criteria outlined in the Immigration Reform and Control Act of 1986,⁵ (2) Veterans' Preference⁶ or union agreement terms apply, and (3) applicants meet age requirements in accordance with the Fair Labor Standards Act. Hiring managers are responsible for completing the records review,⁷ interviewing the candidate, and recording assessment results on a selection matrix. The talent acquisition consultant receives the selection matrix and extends an offer to the top candidate on the matrix. In the event there is a tie between the top two candidates and one of the candidates is underrepresented within TVA, the talent acquisition consultant may extend the offer to the underrepresented candidate in accordance with TVA's affirmative employment plan.

- The TAD Programs department is responsible for implementing (1) talent acquisition programs and (2) governance and programs to build and maintain an inclusive workforce.⁸ In addition, the department provides training courses

³ A talent pipeline is a pool of candidates who are qualified to assume open positions that have been newly created or vacated through retirement or promotion.

⁴ An affirmative employment plan is a plan for improving employment and advancement opportunities for women, minorities, and individuals with disabilities.

⁵ The purpose of this legislation was to amend, revise, and reform/reassess the status of unauthorized immigrants.

⁶ Veterans' Preference was established by the Veterans' Preference Act of 1944, as amended, and is a tool to assist in the placement of veterans in federal government positions by providing a "first consideration."

⁷ The records review includes review of type and years of experience, type of degree, and job performance.

⁸ According to TAD management, this includes university, military, and diversity outreach and recruitment.

pertaining to diversity and inclusion (D&I). TAD Programs developed the intern program, Bold Beginnings, designed to attract a diverse group of interns in order to provide those individuals with meaningful assignments while leveraging their diversity of thought and perspective. The TAD Programs department is also responsible for providing governance to various D&I groups, such as D&I steering teams and employee resource groups (ERG). They also support employees who join professional associations, such as U.S. Women in Nuclear and the American Association of Blacks in Energy.

TAD Programs tasks D&I steering teams with fostering an inclusive culture by modeling diversity and inclusive behaviors, assisting with the execution of D&I initiatives, and developing and implementing activities based on local needs. These teams are in various locations across the TVA region, including Browns Ferry, Watts Bar, and Sequoyah Nuclear Plants as well as in Knoxville, Chattanooga, and Nashville, Tennessee. ERGs are employee-led, self-formed groups designed to provide members with opportunities to exchange information and ideas, offer opportunities for networking with others sharing similar interests, provide avenues to raise issues for improvement, and serve as a source for coaching and mentoring opportunities. The focus of the ERGs is on recruitment, retention, and development of the constituency group it serves. TVA has eight ERGs, including ABLED (Awareness Benefitting Leadership and Employees about Disabilities), African American Voices, ACTion (Asian Collaboration Team), Women Empowered, New Employee Network, Spectrum (LGBT and allies), TVA Veterans' Association, and TVA and Amigos.

TAD monitors metrics associated with its talent acquisition, diversity, and inclusion responsibilities. Specifically, TAD monitors diversity metrics, targeted recruiting program metrics, customer feedback, and completion statistics for inclusive culture training provided to TVA employees. TAD also monitors the culture through TVA's Employment Engagement Survey as well as through observation and consultation with ERGs to determine effectiveness of D&I activities.

TVA used the Corporate Executive Board⁹ to self-assess and benchmark CHRO-related functions and the report, dated April 2015, indicated "low" maturity for recruiting new employees, one of the functions for which TAD is primarily responsible. This rating included sourcing talent, assessing and hiring talent, acquiring critical talent segments, and recruiting executives. TVA also received a "low" maturity rating for managing D&I; however, the report noted that both sourcing talent and managing D&I are high priority areas for TVA. Furthermore, CHRO identified risks, as of FY2016, including the inability to attract and retain diverse and effective leadership talent.

TAD documentation indicated the organization completed various initiatives in FY2016 related to (1) enabling greater levels of diversity, inclusion, and

⁹ The Corporate Executive Board is a best practice insight and technology company. The benchmarking report covered 38 functional activities across seven CHRO-related objectives.

engagement in the workforce and (2) building the talent acquisition function. FY2016 initiatives included:

- Launching D&I groups to drive strategic initiatives aligned to the Diversity Maturity Model.¹⁰
- Designing and launching a diversity recruiting strategy.
- Designing and developing social media engagement campaigns to support D&I and Talent Acquisition efforts.
- Identifying opportunities to incorporate D&I content into core business and technical trainings and developing key content that aligns to D&I behaviors.
- Developing recruiter handbook and training documentation.
- Designing and launching a co-operative and internship program.
- Implementing technological enhancements related to talent acquisition.

TAD's FY2017 initiatives focus on redesigning the talent acquisition process, which includes process and technology enhancements, greater transparency and increased governance and oversight of the selection process, and a formalized TVA-wide internship program. As of September 8, 2016, TAD contained 5 employees and a management team comprised of a director and 2 manager positions, 1 of which is vacant. The average tenure of the group is approximately 3 years.

OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of this evaluation was to identify strengths and risks that could impact TAD's organizational effectiveness. We assessed operations of TAD as of April 2017 and culture as of the date of our interviews occurring in October 2016. To complete the evaluation, we:

- Reviewed CHRO's FY2017 through FY2019 business plan to gain an understanding of goals.
- Reviewed TVA values and competencies (see Appendix A) for understanding of cultural factors deemed important to TVA.
- Interviewed the TAD Director and 1 manager to obtain their perceptions related to strengths and risks that could affect organizational effectiveness.
- Conducted interviews with all 5 employees, 3 contractors, and a management assistant that was shared with the Learning, Growth, and Management organization and analyzed the results to identify themes related to strengths and risks that could affect organizational effectiveness.

¹⁰ The Diversity Maturity Model defines maturity levels for elements of the diversity program, including demographic diversity, ERGs, diversity reputation, diversity mission and values, diversity development opportunities, supplier diversity, diversity training, and diversity recruitment.

- Obtained feedback from 54 out of 96 nonstatistically selected individuals, including Human Resources generalists (HRG), hiring managers, and D&I groups that work closely with TAD and analyzed results to identify strengths and risks from a support service standpoint.
- Analyzed performance management documentation for management and employees in TAD for alignment with department and organizational goals, where applicable.
- Selected a nonstatistical sample of 23 selection matrices from calendar year 2016 to determine whether explanations were documented as to why individuals were or were not selected.
- Reviewed select TVA Standard Programs and Processes (SPP) and guidelines and reviewed documentation pertaining to the talent acquisition redesign to gain an understanding of processes and controls.
- Reviewed results of TVA's 2016 Pulse Survey as compared to the 2015 Employee Engagement Survey to identify changes within the inclusion index. We determined TAD's results were not listed due to the size of the organization.
- Assessed the overall effectiveness of TAD in the following areas, as included in TVA's Business Operating Model:
 - Alignment – How well the organization coordinates the activities of its many components for the purpose of achieving its long-term objectives—this is grounded in an understanding of what the organization wants to achieve, and why.
 - Engagement – How the organization achieves the highest level of performance from its employees.
 - Execution – How well the organization achieves its objectives and mission.

This evaluation was performed in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

OBSERVATIONS

We identified strengths within TAD related to (1) organizational alignment, (2) collaboration, (3) support from TAD management, and (4) department morale and ethics. However, we also identified potential risks that could negatively affect the achievement of the mission. These risks include (1) the potential for increased noncompliance risk due to (a) the use of social media in the recruitment process and (b) no documentation requirements for hiring interns, (2) talent acquisition process inefficiencies, and (3) the potential for ineffective inclusion metrics and programs.

STRENGTHS

During the course of our interviews and data analyses, we identified strengths that positively affected the day-to-day activities of TAD employees and performance. These strengths included (1) organizational alignment, (2) collaboration, (3) support from TAD management, and (4) department morale and ethics.

Organizational Alignment

Our review of performance management documentation for management and employees within TAD revealed performance goals were consistent with overarching TAD goals. In addition, some individuals felt they had input into their performance management goals, and their goals aligned with TAD's mission. We also confirmed TAD business unit responsibilities and initiatives supported the CHRO and TVA missions.

Collaboration

TAD personnel cited department teamwork as a positive attribute of the organization. Some individuals mentioned they manage a large workload and assist each other when needed. Because of the size of the organization, in our opinion, collaboration is a necessary component to the success of the team in achievement of its responsibilities.

Support From TAD Management

The majority of the individuals we interviewed believed TAD management understands and supports the work they do. Several individuals stated that supervisors provide the tools they need, including training. Some individuals also believed TAD management holds individuals accountable and are receptive to differing opinions.

Department Morale and Ethics

The majority of personnel interviewed cited morale within the organization as being positive. In addition, the majority of personnel believed individuals within their organization are ethical and would do the right thing. In our opinion, these characteristics are positive attributes in light of the organizational responsibilities and the changes the organization is undergoing in the FY2017 redesign of the talent acquisition process.

RISKS

We identified risks that could impact TAD's effectiveness in achievement of its responsibilities and contribution to the CHRO mission, including (1) the potential for increased noncompliance risk due to (a) the use of social media in the recruitment process and (b) no documentation requirements for hiring interns, (2) talent acquisition process inefficiencies, and (3) the potential for ineffective inclusion metrics and programs.

Potential for Increased Noncompliance Risk

An inherent risk in the talent acquisition process pertains to noncompliance with antidiscrimination laws and regulations and/or increased exposure to equal employment liabilities. As stated previously, laws such as Title VII of the Civil Rights Act address discriminatory practices based on race, color, religion, sex, or national origin. Protected individuals, such as employees and applicants who feel that employers violate these laws, may file complaints with the Equal Employment Opportunity Commission (EEOC). The U.S. EEOC is responsible for enforcing federal laws that make it illegal to discriminate against a job applicant or an employee because of the certain protected characteristics mentioned previously. Furthermore, the mission of TVA's Equal Opportunity Compliance department is to plan, develop, and implement TVA's total civil rights program to ensure that TVA is an equal opportunity employer and complies with all federal antidiscrimination employment laws, regulations, executive orders, and guidelines. Addressing EEOC complaints can create additional expenditures for an employer due to the time and monies spent investigating the claim. In addition, there is a reputational risk as well as incurrence of compensatory and punitive damages if employers are found liable. We identified the potential for noncompliance with antidiscrimination regulations and/or increased exposure to equal employment liabilities within the recruitment and selection processes.

Recruitment Process

As stated previously, TAD personnel use social media to connect with individuals who might be interested in positions at TVA. According to the *Journal of Social Media for Organizations*,¹¹ social media is advantageous to an organization in that it can assist with maximizing external connections and provide a means for customer feedback and marketing.¹² It can also be used to enhance an organization's reputation. According to TAD management, social media searches are necessary to effectively recruit a diverse pool of candidates in a declining labor market and to identify passive, qualified candidates. However, utilizing social media has its own set of risks related to hiring individuals because it allows employers to see information that could expose them to equal employment liabilities. For instance, employers may visit social media sites and discover an individual's race, religion, or national origin prior to performing the applicants' records review or interviewing the candidate. Furthermore, talent acquisition consultants utilizing social media to build pipelines and/or recruit future employees may increase equal employment liability. This could occur from exclusively relying on social media for pipeline or recruiting purposes that could favor one class of potential applicants over another when competing for jobs.

While social media searches conducted by someone other than the individual making the hiring decision reduces risk of employer liability and can decrease the

¹¹ The *Journal of Social Media for Organizations* is a peer-reviewed, electronic journal that focuses on high-quality empirical investigations, analyses, theories, and case studies in social media development and usage.

¹² Margaret Vroman et al., "Employer Liability for Using Social Media in Hiring Decisions," *Journal of Social Media for Organizations*, Vol. 3, No. 1, July 2016, <http://www2.mitre.org/public/jsmo/pdfs/03-01-employer-liability.pdf>.

risk of discrimination, other activities can further reduce TVA's risk. This includes implementing policies or guidance that define social media pipeline and recruitment activities, including social media sites searched, the relevant and objective search criteria used, and keeping a detailed record of social media searches conducted. Furthermore, defining the expectations of hiring managers with regard to social media use in the hiring process can further reduce risks.

Selection Process

To decrease exposure to equal employment liabilities and to mitigate the risk of discrimination in the hiring process, TAD personnel screen potential employees based on certain requirements prior to providing the list of candidates to the hiring managers. In addition, hiring matrices serve as documentation of a hiring manager's selection criteria and decisions that talent acquisition consultants can examine for irregularities. TAD is planning to strengthen these controls by defining selection criteria before managers receive resumes for review and enhancing interview training and resources for hiring managers as part of its FY2017 talent acquisition redesign initiative.

While controls are in place for acquisition of new employees, those same controls do not exist for candidates selected for the internship program. TAD personnel screen applicants for internships to determine whether they meet minimum requirements. These requirements include enrollment in an accredited two-year technical or community college or a four-year college or university, completion of 30 hours of coursework, and achievement of at least a 2.75 grade point average. Once applicants meeting these requirements are identified, their information is sent to the hiring managers who select a candidate for the internship.

TAD personnel do not review or maintain documentation of intern candidate selections; therefore, hiring managers could select someone for reasons other than those considered job-related. Employment laws cover interns, whether they are considered employees or contractors whose daily work is closely controlled and directed by TVA management. While the risk of an applicant filing a complaint with the EEOC is low, not documenting reasons for candidate selection exposes TVA to potential liability pertaining to antidiscrimination laws and regulations and can increase reputational risks. Furthermore, it allows hiring managers who may have an unconscious bias¹³ to select candidates based on that bias. Implementing controls, such as those required of new applicants, can further reduce potential equal employment liabilities.

Talent Acquisition Process Inefficiencies

We interviewed a nonstatistical sample of hiring managers to obtain feedback pertaining to the talent acquisition process. While some individuals mentioned having a positive experience with TAD personnel and/or stated the hiring process is improving, some individuals identified risks that could negatively affect their business units. Specifically, individuals mentioned the hiring process was cumbersome and time-consuming with regard to the time it takes to process a

¹³ Unconscious bias occurs when discrimination and incorrect judgments occur due to stereotyping.

candidate including background checks, which are outside of TAD's control, and the length of time from posting the application to reviewing resumes. Some individuals also had concerns about the recruitment methods used because of the lack of candidates or the skill set of candidates.

In addition to the above, a few hiring managers described potential issues with role clarity between TAD personnel and the HRGs who serve as the first point of contact for the CHRO. In these instances, individuals described receiving conflicting information from both the talent acquisition consultant and the HRG with regard to the hiring process. Some HRGs we interviewed also identified role clarity and alignment issues with TAD personnel. Not addressing these issues could increase the time to fill a position. In addition, it could be motivation for hiring managers to recruit and/or hire individuals outside of the talent acquisition process, which TAD personnel stated has been attempted with regard to recruitment of individuals, thereby increasing equal employment opportunity (EEO) liability. According to TAD documentation, there are plans to implement training for hiring managers that will assist with identifying legal risks. TAD has also developed a document outlining roles and responsibilities for the hiring manager, TAD personnel, HRGs, and other individuals involved in the hiring process. TAD management stated that TAD has initiated a series of meetings across leadership teams and employee-based sessions to highlight this document.

Inefficiencies in the talent acquisition process, such as those described above, were identified in Office of the Inspector General Audit Report 2014-15234, TVA's Talent Acquisition and Deployment Process, which has an open recommendation with an expected completion date of June 2017. According to HR management in response to the recommendation, HR completed a staffing process map, is developing ad hoc training as necessary, and has used a talent acquisition alignment team to identify and implement changes to the process. The response also stated that, because of changes to People Lifecycle Unified System¹⁴ and the initiative to collect job requirements and add them to position descriptions, items related to online training and position requirements needed to be extended to June 2017. This recommendation was closed on July 28, 2017. In addition, TAD documentation reflects that technology enhancements, part of the FY2017 talent acquisition redesign initiative, will improve "the effectiveness and efficiency for Talent Acquisition and hiring managers to fill roles with the right people at the right time." The redesign is to include increased access to more highly qualified candidates, which may address the concerns we identified pertaining to recruitment methods used.

Furthermore, TAD personnel self-identified areas where they may inadvertently fail to complete all necessary steps in the acquisition process, which might increase the length of time to hire a candidate. Specifically, these "single points of failure" have been described by TAD personnel as noncompliance with union agreement terms and application of Veterans' Preference. For instance, union agreements may require TVA to post certain positions internally. For positions

¹⁴ The People Lifecycle Unified System is TVA's HR system.

posted externally, TVA must apply Veteran's Preference, which allows eligible veterans or those deemed as preference eligible¹⁵ to apply for positions noncompetitively. TAD management indicated they are working to address the risk. In addition, as part of the FY2017 talent acquisition redesign, TAD planned to update the SPP related to filling vacant positions and applying Veteran's Preference. As of May 1, 2017, the SPP related to filling vacant positions had been revised and approved. There are also plans to post more positions and limit direct selection usage, which provides individuals with more opportunities to apply on positions.

Potential for Ineffective Inclusion Programs and Metrics

As stated previously, TAD is responsible for implementing governance and programs to maintain an inclusive workforce. Inclusion, as defined in the Leader Guide supporting the 2015 Employee Engagement Survey Results Rollout, is the extent to which employees are "respected, supported, valued, and enabled to fully participate." TAD has fostered the creation of diversity steering teams and ERGs to focus on increasing D&I across TVA. While TAD personnel and ERGs encourage participation from everyone in TVA, these teams are primarily based on specific characteristics or demographics and are designed to address underrepresentation of certain personnel within TVA. We obtained feedback related to D&I from individuals working closely with TAD and found, while some believed that working with TAD personnel was a positive experience, there were several issues pertaining to the D&I initiatives. Specifically, comments from individuals included the need for attracting more participation in the D&I teams, the need for additional communication and/or training, and feeling the diversity focus is based on visible traits rather than other attributes, which could deter participation.

While diversity was defined by gender, race, demographic differences, and other characteristics, Deloitte's *2017 Global Human Capital Trends* report¹⁶ states the "new rules" around D&I for companies is to define diversity in a broader context than visible traits and include concepts related to invisible traits such as diversity of thought. In addition, TVA's Employee Handbook states "TVA is inclusive of all people, regardless of race, color, national origin, ethnicity, gender, abilities/disabilities, religion, age, personality, or other differences."

Because the groups fostered by TAD primarily focus on acquisition and inclusion of underrepresented personnel, there is a risk that individuals who comprise a majority of the workforce will feel excluded because there is no group representing their demographic. According to TAD management, there are plans to create "tiger teams" representing the most and least represented groups in TVA. The purpose of these teams is to increase support and participation in the

¹⁵ Preference eligibility includes disabled veterans or persons with a derivative preference, such as the spouse of a disabled veteran, widow/widower of a veteran, or mother of a veteran who can apply under certain circumstances.

¹⁶ Deloitte, a team of professionals that provide audit, consulting, risk management, and related services, has published global human capital trends for the past 5 years. The current report, dated 2017, includes input from approximately 10,000 business and HR leaders across 140 countries. The majority of respondents were from medium or large companies.

existing ERGs. TAD management also stated they are in the process of creating a new ERG related to innovation that is designed to address diversity of perspectives. Furthermore, TAD management stated they have created an inclusion interview guide that addresses diversity, including differing perspectives. According to Deloitte's *2017 Global Human Capital Trends* report, research suggests that one of the biggest sources of bias within companies is a lack of diversity of thought. By addressing the inclusion of all individuals regardless of visible or nonvisible diversity characteristics, TVA can enhance organizational performance. Specifically, engaging individuals who have differing perspectives can increase innovation, creativity, and engagement.

As noted earlier in this report, TAD monitors the inclusion culture through TVA's Employment Engagement Survey as well as through observation and consultation with ERGs to determine effectiveness of D&I activities. From the 2015 Employment Engagement Survey to the 2016 Pulse Survey, the Inclusion Index increased by 1 percent for TVA. However, the 2015 Employee Engagement Survey contained eight questions designed to measure inclusion risk at TVA, while the 2016 Pulse Survey, contained only three questions to gauge inclusion. These differences make it difficult to trend improvements or declines in the Index. In addition, there has not yet been a survey conducted for 2017. According to TAD personnel, they also examine the respectful workplace incident reports¹⁷ and receive anecdotal information from the ERGs and HR to monitor the inclusion culture. While these may serve as indicators of the inclusive culture within TVA, expanding the metrics may provide a more comprehensive view of inclusion. For example, TAD currently tracks the number of open and closed employee concerns; however, further in-depth monitoring of these concerns as well as EEO complaints may signify whether there is increased risk related to inclusion in organizations across TVA.

CONCLUSION

As indicated previously, TAD is a small organization that has the opportunity to interact with many individuals across TVA. Through engagement and identification of talent suitable for employment, it interacts with new employees as well as TVA leadership. Furthermore, it has the potential to interact with current TVA employees through D&I programs. These interactions present opportunities for decreasing equal employment liabilities because of the oversight it provides in the acquisition process as well as fostering an environment where employees feel safe to express differing opinions, thereby fully contributing to TVA regardless of their visible or invisible diversity traits.

With the maturity levels of the recruiting process and management of D&I programs being rated low as well as the prior identification of talent acquisition process inefficiencies, TAD has focused its efforts on enhancing D&I management and transforming the talent acquisition process. By incorporating

¹⁷ According to TVA's Leader Handbook, these reports contain incidents involving inappropriate behavior that are to be reviewed on a quarterly basis so common themes and repetitive problem areas may be identified.

actions related to the risks identified in this report, TAD can further decrease potential liabilities and increase the potential for employee engagement and performance across TVA. Based on TVA's Business Operating Model, we evaluated the risk of three critical areas that could impact TAD's effectiveness:

- Alignment risk is low based on the alignment of management and employee goals within the TAD organization to the TAD mission. In addition, some TAD personnel stated they had input into their goals and believed the goals aligned with the TAD mission. We also confirmed that TAD business unit responsibilities and initiatives supported the CHRO and TVA mission.
- Engagement risk is low. TAD personnel cited collaboration and morale as strengths for the organization. Furthermore, the majority of individuals believed TAD management understands and supports the work they do, provides tools they need, holds individuals accountable, and are receptive to differing opinions. TAD personnel also held the belief that individuals within their organization are ethical and would do the right thing.
- Execution risk is medium due to risks in the recruitment and selection processes related to the potential for EEO liability, process inefficiencies in talent acquisition, and potential ineffectiveness of inclusion metrics and programs. There is potential for this risk to decrease with the implementation of the initiatives related to the talent acquisition redesign.

RECOMMENDATIONS

We recommend the Director, TAD:

1. Develop a policy or guideline to define (a) social media pipeline and recruitment activities, including social media sites searched and the relevant and objective search criteria used, and (b) expectations of hiring managers with regard to social media usage in the hiring process. Require record retention of social media searches conducted for potential applicants.
2. Implement controls over the intern hiring process, including documentation retention of criteria used for intern candidate selection and evaluation results.
3. Continue with plans to (a) update the SPP related to applying Veteran's Preference and (b) limit direct selection usage.
4. Continue with plans to address the inclusion of individuals based on characteristics other than those represented in the ERGs and expand the D&I metrics to obtain a more comprehensive view of inclusion within the organization.

TVA Management's Comment's – TVA management generally agreed with the recommendations related to social media usage, controls over the intern process, continuing with plans to update the SPP related to Veteran's Preference, and limiting direct selection usage. TVA management's planned

actions include establishing guidelines related to social media use in recruiting and addressing risks with stakeholders, implementing a selection process for interns, and updating the Veteran's Preference SPP. However, TVA management did not agree with the recommendation related to expanding the D&I metrics because they believe there is a collaborative monitoring approach with other TVA organizations. TVA management also provided comments related to the content of the draft report that we incorporated as appropriate. See Appendix B for TVA management's complete response.

Auditor's Response – We disagree with TVA management's inaction related to the expansion of TAD's D&I metrics. According to TVA documentation, TAD is (1) responsible for implementing governance and programs to build and maintain an inclusive workforce and (2) accountable for monitoring the TVA culture to target inclusive cultural interventions and assure effectiveness. TVA management indicated in their response that TVA utilizes metrics, such as internal talent mobility and D&I participation, to monitor inclusion. We would argue these metrics are designed to track the implementation of inclusion programs and actions rather than program effectiveness. TVA management's response also indicated that TAD reviews respectful workplace information and the inclusion index regularly. Supporting documentation reflected that data examined by TAD personnel contained fluctuations in respectful workplace incidents from the current year to the prior year rather than fluctuations across multiple time periods. Trending employee grievances, such as EEO complaints and employee concerns, and the inclusion index over time could allow TAD personnel to more effectively (1) monitor the inclusion culture across TVA and within TVA organizations and (2) assess the effectiveness and sustainability of TAD programs designed to build and maintain an inclusive workforce.

We revised the report to address TVA management's comments related to (1) expansion of the TAD program descriptions, (2) clarification of the recruitment process and associated recommendation, (3) inclusion of TAD actions pertaining to role clarity and response to Audit Report 2014-15234, (4) revision and approval of the SPP related to filling vacant positions, and (5) clarification of inclusion programs. Descriptions of TAD departments and programs were summarized based on TVA documentation; therefore, not all TAD suggestions were incorporated into this report.

TVA Values	
Safety	We share a professional and personal commitment to protect the safety of our employees, our contractors, our customers, and those in the communities that we serve.
Service	We are privileged to be able to make life better for the people of the Valley by creating value for our customers, employees, and other stakeholders. We do this by being a good steward of the resources that have been entrusted to us and a good neighbor in the communities in which we operate.
Integrity	We conduct our business according to the highest ethical standards and seek to earn the trust of others through words and actions that are open, honest, and respectful.
Accountability	We take personal responsibility for our actions, our decisions, and the effectiveness of our results, which must be achieved in alignment with our company values.
Collaboration	We are committed to fostering teamwork, developing effective partnerships, and valuing diversity as we work together to achieve results.

TVA Leadership Competencies

Accountability and Driving for Results
Continuous Improvement
Leveraging Diversity
Adaptability
Effective Communication
Leadership Courage
Vision, Innovation, and Strategic Execution
Business Acumen
Building Organizational Talent
Inspiring Trust and Engagement



Tennessee Valley Authority, 400 West Summit Hill Drive, Knoxville, Tennessee 37902

August 3, 2017

David Wheeler
Office of Inspector General
400 W. Summit Hill Drive, ET 3C-K
Knoxville, TN 37902

RESPONSE TO AUDIT **2016-154453-03** - Talent Acquisition and Diversity's
ORGANIZATIONAL EFFECTIVENESS

Dear Mr. Wheeler:

Please accept the following comments in regards to the draft report. Our comments address each recommendation and supporting facts, conclusions, and recommendations. Any initiated or completed remediation has been noted as well.

To begin the response, we will focus on key comments of the draft report followed by specific responses to the recommendations.

What the OIG Found (page i):

The strengths and risks associated with TAD as described in this section provided an overview of the OIG draft findings. The areas of risk will be explored further in the later sections, but of note the third risk related to potential for ineffective inclusion metrics and programs fails to take into account the full spectrum of the sustainable infrastructure, programs, HR processes and organizations, industry best practices as well as current metrics that drive efforts. Additional comments will follow. The OIG findings indicated that additional metrics would be required to ensure inclusivity among employees and that it is solely the responsibility of D&I to address employee engagement. We disagree, this assumption does not take into account the broader responsibilities of the full CHRO and the accountability of leadership across TVA. TVA has initiated multiple steps to gauge inclusion across TVA through the use of the Inclusion Index as well as tools implemented by the EEO office and the Human Resources office.

Response: Remove as a risk area

Background (pp 1-4):

The Talent Acquisition department responsibilities are not captured correctly on page 2.

Response: Align definition to the responsibilities as listed in HR-SPP-11.2.0 using the following suggested language.

The Talent Acquisition department is charged with five primary oversight functions as established in TVA's SPPs - (1) Ensure all selections are based on merit and efficiency and all selection processes are followed; (2) Ensure all Federal laws, negotiated agreements with employee unions, and TVA requirements are met when hiring internal and external applicants; (3) Oversee selection process and applicant records for fairness in selection process; and (4) Ensure appropriate approvals for selection are obtained; and (5) As dictated by the appropriate workflow (Management Specialist vs. Represented), ensure feedback provided to applicants in a timely manner of their application status at key decision points in the process.

As part of Talent Acquisition's execution, it seeks to identify, source and recruit a diverse and qualified workforce. This approach is part of TVA's commitment to providing equal employment opportunities and adherence to Federal laws including but not limited to Title VII of the Civil Rights Act, Fair Labor Standards Act, Immigration Reform and Control Act of 1986, Veterans' Preference Act. Additionally, TVA complies with regulations which includes the EEOC regulation that requires an annual MD-715 Report outlining TVA's plans to ensure a diverse, qualified workforce. TVA seeks to attract qualified, diverse talent through a wide-range of efforts many of which are above and beyond adherence to laws. For example, TVA posts all of its external positions through local community-based organizations, veterans associations, local job banks and other job assistance programs, leveraging the same approach as the OFCCP regulations of which TVA is not bound. TVA also attends career events hosted by various diversity associations and community organizations and universities. Partnerships are established to brand TVA as an employer of choice across the various communities within the Tennessee Valley. In addition, TVA leverages social media to identify, recruit and invite to apply passive and active candidates with required skill sets.

The TAD Programs are not appropriately defined nor is the description of the infrastructure fully described. (p. 2)

Response: Report the responsibilities of the TAD Programs to be identifying, implementing and supporting (1) talent acquisition programs to include university, military and diversity outreach and recruitment and (2) diversity and inclusion programs designed to promote a diverse and inclusive workforce and workplace while working to enhance relationships with diverse communities across the Tennessee Valley.

The OIG report notes a Corporate Executive Board benchmark report on April 2015. This self-assessment was taken by leaders within the TVA CHRO organization as a proactive approach to measure maturity of the function, not execution or performance of the team. It was used to identify areas of opportunity and focus as the organization sought to prioritize actions to continue progress to mature the function. Since 2015, the TVA CHRO and the TAD organization have undergone a number of efforts to enhance and improve overall service delivery including standing up a robust D&I infrastructure that continues to mature as well as a total transformation of the talent acquisition process. Maturity since 2015 has progressed based on decisions by the CHRO leadership since that initial self-assessment.

Response: Denote that significant improvement and focus as a result of the self-assessment has resulted from this exercise.

Observations (pp 5-11)

Strengths: Concur with strengths and recognize that these strengths also support a reduced risk overall especially in the execution of the selection process given the strength of the department's morale and ethics.

Risks: The OIG noted three primary risks including (1) the potential for increased employer noncompliance due to (a) the use of social media in the recruitment process and (b) no documentation requirements for hiring interns, (2) talent acquisition process inefficiencies, and (3) the potential for ineffective inclusion metrics and programs. Our response to these risks are below

Potential for Increased Noncompliance Risk (page 7):

The draft report noted that the OIG had identified the potential for noncompliance with antidiscrimination regulations and/or increased exposure to equal employment liabilities within the recruitment and selection process. We do not concur with this statement as there was no evidence of atypical risks. As noted in the same paragraph, such risk is inherent with talent acquisition. TVA has comprehensive processes and policies designed to mitigate such risks as well as provides numerous processes for any candidate who may feel TVA was noncompliant to object to the process. These measures go beyond what one would find in a typical IOU. SPP 11.2.0 Filling Vacant Positions outlines the comprehensive process for ensuring adherence to all applicable antidiscrimination regulations and equal employment.

Response: Rewrite that sentence to read: "The OIG found additional opportunities to further mitigate risks to TVA's already extensive process to safeguard against discrimination and to ensure equal opportunity

Recruitment Process (p. 7)

Social Media recruitment is an essential component of attracting qualified, diverse applicants. In order for TVA to effectively recruit a diverse pool of candidates with a declining labor market, and to identify passive, qualified candidates, social media searches are necessary. TVA is committed to expanding the pool of qualified, diverse talent pools and as such needs to proactively reach a more diverse pool of qualified applicants. One of the primary tools for outreach to passive candidates is social media but it is not the only source leveraged by TVA. A 2016 SHRM study noted that the primary uses of social media by corporations (82%) are to identify passive candidates and target job candidates with a specific set of skills (71%). TVA defines an applicant as the point in which a candidate formally submits an application through the Careers page at TVA.com. The potential for risk that exists with social media is the same as leveraging a career fair or in conducting an interview. TVA takes steps above-and-beyond to ensure that all candidates who apply are give the opportunity to compete fairly and equitably based on merit. Candidates identified through social media are invited to formally apply and compete for positions and are not provided any special consideration, preference or unique identifier in the selection process. TAD only sends candidates to managers who have formally applied for a position and only invites candidates who have been identified through social media to formally apply to posted positions. Keeping a detailed record of social media searches conducted would represent an unnecessary administrative hardship and would expand risks.

Response: TVA does not agree that the use of social media represents a risk as it is both necessary to attract qualified, diverse pools of candidates and offers the same exposure to candidates as attending a career fair. TVA's selection processes of applicants beginning at the application process remains unbiased with no identifiers, demographic information, pictures or source denoted to the hiring manager. The addition of more administrative burden would detract from TVA's Talent Acquisition team from focusing on being both proactive in identifying candidates, reducing time-to-fill as this would lead to more time to complete administrative tasks, and mitigating risks in other components of the process due to increased time constraints in tracking searches.

Selection Process (p. 8)

We concur that there is a potential risk in the selection process of interns (p. 8) identified by the report; however, we believe this risk is very limited and low. The number of interns who return to TVA as full-time employees remains below industry norms and they are often hired after several years of being an intern. TVA will address this further in the response to the OIG Recommendations section.

Talent Acquisition Process Inefficiencies (pp 8 - 10):

The report notes that hiring managers had concerns related to the recruitment methods used because of the "lack of candidates or skill set of candidates" (p 9). This notation is another example of why the expanded use of social media and other progressive sourcing techniques adopted by the TAD team is critical for success in better identifying and inviting diverse, qualified individuals to apply to TVA's opportunities.

Recommendation: Reflect that TVA should continue to expand its leverage of progressive sourcing and outreach methods to identify qualified, diverse pipelines to address the staffing needs. TVA has already added several new methods including the leverage of localjobnetwork.com, LinkedIn, and a recruiting marketing system (Talemetry).

In relation to the role clarity observation in the report, the TAD team has developed and posted on SharePoint a role clarity document that outlines the steps and anticipated timeline in filling a vacant position. The TAD team has also initiated a series of meetings across leadership teams and employee-based sessions to highlight this document.

Response: Remove this as a potential area of concern.

The notation around the OIG Audit Report 2014-15234 has been addressed and closed. In regards to the statement related to areas where TAD team members may inadvertently fail to complete a step relate to infrequent situations. As noted in the OIG report, such single points of failure can increase time-to-fill. The OIG recommendation for tracking social media searches would expand the single points of failure thus potentially adding additional time-to-fill. There are, however, some checks in the process including review by the HR Transaction Team of all selection material and a review of offers by TAD management prior to offer extension. The recent transformation of talent acquisition included looking for ways to streamline and make more efficient the process and TVA seeks to further mitigate in planning for PLUS upgrade to 9.2 .

The revised SPP Filing a Vacant Position extremely limits where there can be a waiver for non-posting and additional requirements are in place where a non-posting selection is made. This SPP has been completed and TAD is ensuring oversight of compliance.

Response: Remove this as a potential area of concern.

Potential for Ineffective Inclusion Programs and Metrics (p. 10-11):

Whereas TVA continues to mature its programs related to diversity and inclusion, the report did not address a fully comprehensive view of the programs and efforts. TVA's CEO has signed TVA POL 11-002, which outlines TVA's commitment to

"create and implement strategies to attract, develop, and retain a workforce that is representative (at all levels) of the Tennessee Valley population, ensuring that TVA maintains the advances that have been made in equal employment opportunities while continuing to be aggressive in reaching these goals and creating an environment where each employee is enabled to contribute their individual talents to the successful achievement of TVA's business objectives."

TVA's D&I organizational model demonstrates a robust infrastructure designed to provide employees opportunities to fully engage. The OIG report didn't fully address the comprehensive nature of this organizational model in attracting, retaining and engaging employees at TVA. It insufficiently characterized the importance of the steering teams that are currently active at the seven largest locations across TVA. These steering teams are similar to the Deloitte "inclusion councils". They are made up of any individual from that location interested in expanding inclusion within their location. They have direct interface with senior leadership at those sites to address concerns and areas of opportunity as well as to host events open to all employees that focus on a range of perspectives and dimensions of diversity.

The Employee Resource Groups are designed to address four primary areas (1) Career Development, (2) Community, (3) Commerce/Business and (4) Culture, which is an industry best practice known as the Four C's. Each ERG must develop a strategy to design programming to provide all employees opportunities to engage across those dimensions. Several of the ERGs, including Spectrum, New Employee Network, Veterans Association, ABLED, and Ignite do not focus on visible traits as noted in the OIG report. The Men Enabling iNclusion Tiger Team/Task Force is focused on building recommendations for including additional engagement by the white male population (TVA's largest represented group). The career development programming is specifically designed for all employees to engage. In addition to these, TVA supports and recognizes various professional associations of which visible traits are not necessarily the focus, in fact, all are welcome and encouraged to participate. The North American Young Generation in Nuclear focuses on generational inclusion across TVA's Nuclear fleet.

Response: Remove this as a potential concern.

The Inclusion Index and other metrics are industry best practices for monitoring inclusion. TVA requested from CEB a list of different metrics used by companies to monitor inclusion. TVA leverages several of these tools that it has deemed most appropriate for TVA including the Inclusion Index, representation, internal talent mobility, turnover and D&I training participation. Additionally, TVA tracks EEOC, recruiting metrics, sourcing channels, and has integrated D&I messages and themes across corporate and technical training programs. TAD partners with the EEO team and with HR to regularly review the Respectful Workplace report and the Director of TAD serves as a primary POC for individuals to contact related to a potential issue or concern as noted on posters across TVA. The collaborative approach for addressing EEO and Respectful Workplace issues allows for a more immediate and comprehensive

approach. The EEO team proactively conducts training across TVA locations based on trend data and all of the organizations are provided and review the trend information provided by the Respectful Workplace program owners related to reported incidents, which also tracks the response by TVA management and the CHRO organization.

The Inclusion Index leveraged by TVA is a robust tool that provides trends leveraging a model of a full engagement survey followed by pulse surveys to track changes. TVA employs a well established company to conduct these surveys with industry-wide data that ensures reliability and validity to the survey results. TVA conducts the survey on a regular cadence which is industry best-practice.

Recommendation: Remove this as a potential concern or risk area as TAD already reviews comprehensive metrics including trend data around EEO and Respectful Workplace trends in addition to a number of other key indicators.

Conclusions (pp. 11-12)

Recommendation: The Conclusion section be reconsidered given this response.

Recommendations (p 12)

Recommendations	Response
Develop a policy or guidance to define (a) social media pipeline and recruitment activities, including social media sites searched and the relevant and objective search criteria used, and (b) expectations of hiring managers with regard to social media usage in the hiring process. Require record retention of social media searches conducted for applicants.	We concur with the portion of the recommendation that overall guidelines need to be established to ensure appropriate use of social media as part of recruitment activity and to ensure key stakeholders understand the risks associated (currently under development with anticipated completion by October 1, 2017). Remove remaining items.
Implement controls over the intern hiring process, including documentation retention of criteria used for intern candidate selection and evaluation results.	We concur with this recommendation and are implementing the same selection processes to interns as we do with non-intern selections (to be completed by September 1, 2017).
Continue with plans to (a) update the Standard Programs and Processes related to filling vacant	Remove or note as completed. The TVA-SPP-11.2.0 has been updated and is in currently in effect as of May 1, 2017

positions and applying Veterans' Preference and (b) limit direct selection usage	The applying Veterans' Preference is being finalized at this time and should be completed by September 1, 2017.
Continue with plans to address the inclusion of individuals based on characteristics other than those represented in the ERGs and expand the D&I metrics to obtain a more comprehensive view of inclusion within the organization.	Remove this recommendation.

Please let me know if you need any further information.

Sincerely,



Christopher Carlson
Director of Talent Acquisition and Diversity