



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Washington, D.C. 20507

Equity Action Plan in Accordance with Executive Order 13985—Advancing Racial Equity and Support for Underserved Communities through the Federal Government

January 2022

Executive Summary

The U.S. Equal Employment Opportunity Commission (EEOC or the Commission) was created by the landmark Civil Rights Act of 1964 in direct response to the historic 1963 March on Washington for Jobs and Freedom. The EEOC opened its doors in 1965 with a mission to prevent and remedy discrimination in our nation’s workplaces. Today the agency enforces federal equal employment opportunity laws (EEO laws) prohibiting workplace discrimination based on race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability, and genetic information.

The EEOC serves the public by preventing employment discrimination and promoting inclusive workplaces through public education, training, and outreach; investigating and resolving charges of unlawful employment discrimination; advising and providing technical assistance to other federal agencies in meeting their responsibilities under EEO laws; and litigating individual, class, and systemic discrimination cases that advance opportunity in employment.

Historically underserved communities and low-wage employees, who often are unable to secure private representation when their employment rights are violated, rely on the work of the Commission. As such, the goals of Executive Order (E.O.) 13985, “Advancing Racial Equity and Support for Underserved Communities through the Federal Government,” fall squarely within the Commission’s purview. The EEOC submits this equity action plan to implement E.O. 13985 and to develop a “comprehensive approach to advancing equity for all.”

Summary of action plan: The EEOC’s equity action plan focuses on systemic racial discrimination, advancing equity in the agency’s activities, and improving outreach and access to underserved communities. The plan accomplishes this by 1) improving worker access to the EEOC’s charge filing process so that individuals in rural areas, with inflexible schedules or with limited digital resources can use EEOC services with greater ease, which will impact communities who are disproportionately Black, Hispanic and Native American; 2) engaging with a broad range of employers, researchers, and worker and civil rights organizations to support diversity, equity, inclusion and accessibility; 3) further developing the EEOC’s data collection and analysis to support effective enforcement of EEO laws and to empower individuals to exercise their rights under those laws; and 4) continuing to improve access to EEOC’s resources for people whose primary language is not English or who have limited proficiency in reading or accessing digital resources.

Summary of Early Accomplishments

Since E.O. 13985 was released on January 20, 2021, the EEOC has made its outreach more equitable and increased its focus on reaching traditionally underserved communities more effectively. For example:

- Since 2021, the EEOC has actively participated in several interagency policy committees (IPCs), including the Employment for Formerly Incarcerated Persons IPC; the Gender Policy Council; and the Diversity, Equity, Inclusion, and Accessibility Working Group.
- In April 2021, the EEOC held a virtual hearing on workplace civil rights issues related to the COVID-19 pandemic. The Commission received testimony from a diverse panel of experts on effective outreach to underserved communities during the pandemic as well as how the pandemic is further harming already vulnerable populations (e.g., people of color, women broadly, immigrant and migrant workers, caregivers, religious minorities, individuals with disabilities, and older workers). The hearing highlighted pandemic-related violence and discrimination targeting Asian American, Native Hawaiian, and Pacific Islander (AANHPI) persons, job losses and salary reductions for people of color, and the lack of safety protections for essential workers of color.
- In May 2021, the EEOC posted, in English and Spanish, a plain language “Know Your Rights” resource explaining how federal EEO laws protect workers during the pandemic.
- In spring 2021, the EEOC issued two resolutions condemning the violence and growing acts of bias against AANHPIs and Jewish persons, respectively, in the United States. These resolutions reaffirm the agency’s commitment to combat racism, national origin and religion-based harassment, and all other forms of unlawful discrimination in our nation’s workplaces.
- In June 2021, on the anniversary of the U.S. Supreme Court’s decision in *Bostock v. Clayton County*, the EEOC issued technical assistance summarizing *Bostock* and prior EEOC federal sector decisions related to LGBTQI+ issues in easily understandable terms.
- In summer 2021, the EEOC began posting additional translated materials on its Spanish-language website to better communicate with Spanish-speaking individuals. The EEOC also translated key resources into seven additional languages (i.e., Arabic, simplified Chinese, Haitian Creole, Korean, Russian, Tagalog, and Vietnamese).
- In September 2021, the EEOC renewed its Memorandum of Understanding with the Mexican government to provide Mexican nationals in the United States with information, guidance, and access to education and training resources to help them understand and exercise their employment rights, particularly with regard to reducing violations against them under the laws and regulations that are administered and enforced by the EEOC. The EEOC plans to develop similar partnerships with other nations as well.

- In October 2021, the EEOC launched an initiative to ensure that artificial intelligence and other emerging employment tools comply with federal civil rights laws and do not lead to, perpetuate, or exacerbate unlawful discrimination against people of color, women, people with disabilities, or other protected groups. As part of this initiative, the EEOC is collaborating with other administration partners, has created an internal working group, and is engaging in a series of listening sessions with key stakeholders, among other things.
- In November 2021, the EEOC announced a joint initiative with the U.S. Department of Labor and the National Labor Relations Board (NLRB) to address more effectively the significant problem of unlawful retaliation, which is an issue raised in approximately 56 percent of charges of discrimination filed with the EEOC, and often impacts vulnerable and immigrant workers.
- In January 2022, the EEOC and the Department of Labor's Office of Federal Contract Compliance Programs (OFCCP) launched a Hiring Initiative to Reimagine Equity (HIRE), which will help identify actionable strategies to increase diversity, equity, inclusion and accessibility (DEIA) in hiring and recruitment. The launch event was a roundtable featuring the perspectives of employers, labor, and civil rights organizations and was viewed in real time by nearly 1,500 attendees.

(1) Equity Action Plan: Improving EEOC's Public Interaction & Charge Filing Process for Vulnerable and Underserved Communities

A. The Challenge

Barrier being addressed: The EEOC's intake process is difficult to access and complete for individuals who have limited Internet resources, lack reliable transportation, do not live close to field offices, have rigid workhours, or have limited English proficiency or literacy skills. While the EEOC has processes in place to try to reduce these barriers, additional resources and focus on this issue will ensure greater access for these individuals.

Population impacted by barrier: The population primarily impacted are individuals in low-wage jobs, who disproportionately include Black people, immigrants, women, and people in rural or remote areas (including many farmworkers and Native American Tribal members).

Evidence indicating this barrier meaningfully impacts serving communities equitably: Individuals in underserved communities may hold jobs that make it hard to come into the EEOC office during traditional office hours or otherwise lack reliable transportation or Internet access. Individuals may only formally file a discrimination charge after they have made an inquiry to EEOC via the online portal, mail, fax, hand-delivery or phone call, which is generally followed by direct contact with an EEOC representative in person, by telephone, or by video conference. Because this process may present hurdles for members of underserved communities with limited

digital resources or limited literacy, the agency has made efforts to identify other methods for contacts with such individuals, but challenges remain. The barriers are even higher for individuals living in rural areas or Tribal nations that are in states where the EEOC does not have offices (e.g., Idaho, Alaska, Wyoming, Oregon, and North and South Dakota), where there is not an established presence of a state or local Fair Employment Practices Agency, or where internet access may be limited.

Demand for EEOC's intake services has resulted in roughly half of EEOC offices sometimes having filled appointment calendars, some up to four months in advance, and an average wait time of 25 minutes for individuals contacting the EEOC via the national call center. Each of these circumstances may reduce the likelihood that an individual will complete the charge filing process. These challenges are most significant for the poorest individuals, those who face cultural and linguistic barriers to accessing EEOC services, and those who lack attorneys—i.e., the workers who may most urgently need EEOC assistance. Finally, American Indians and Alaska Natives are underrepresented on EEOC's staff, which may be problematic in areas with a significant American Indian or Alaska Native segment of the workforce.

Near- to mid-term outcome: In the near- to mid-term, the goals of this action are to expand mechanisms for the underserved public to access EEOC services outside of regular business hours on occasion, and to create resources that bridge the digital and cultural divides. While EEOC has expanded-presence programs targeted at reaching underserved and unserved communities, additional resources are needed to increase these efforts. These resources include better staff support for Tribal outreach and a more robust outreach plan that builds on the EEOC's current relationships with organizations and media outlets that reach underserved populations.

Long-term success: The long-term goals of this action are to continue expanding services that provide vulnerable and underserved individuals timely and convenient access to EEOC's services. Another goal is to establish a National Program for Tribal Affairs, and to deploy investigators and outreach coordinators to locations on or near reservations, which may result in the hiring and retention of more staff who are American Indians or Alaska Natives.

B. The Action

The action that will occur: The EEOC will expand public access to its services by streamlining its intake procedures to reduce wait times for intake appointments and adding additional and multilingual staffing for the national call center, which will reduce wait times for persons who require an interpreter to use the EEOC's call center. Additionally, the EEOC will seek to expand its ongoing language access efforts by working to make its online intake forms and public portal available in additional languages. It will also explore extended intake hours, increase events for underserved communities, and broaden its current national outreach plan to improve access to Commission services for underserved populations, including Tribal members who live in Indian country. This plan will include recruitment activities with universities and organizations with ties

to Tribal communities and other underserved communities. Additionally, the EEOC will explore creating a National Coordinator for Tribal Programs position, as well as hiring staff in geographic areas where the EEOC has had a limited physical presence, including staff who can work remotely from or near rural areas or Indian reservations.

Reasons for prioritizing the action: Because the EEOC’s work focuses on advancing equity and combatting discrimination, ensuring that its services are more readily accessible will contribute substantially to the goals of E.O. 13985. Additionally, if targeted outreach to Tribal members is successful, it can serve to inform future EEOC efforts to reach rural areas more broadly and other underserved populations in areas without EEOC offices and with limited Internet access.

Connection to the equity assessment: As noted above, ensuring that individuals who suffer employment discrimination can readily obtain EEOC’s support will advance racial equity and support members of underserved communities. In addition, our equity assessment found that American Indian and Alaska Native staff were the only underserved demographic underrepresented on EEOC staff compared to the civilian labor force. This affects the agency’s ability to serve this population effectively. Each of the 574 Tribal Nations have their own distinct government and needs. Nonetheless, Tribal members may not be familiar with the EEOC or the laws it enforces—indicating a need to ensure those in Indian country are aware of and can access our services.

Connection between the proposed action and outcome described: The EEOC has been proactive in ensuring that deaf or hard of hearing individuals have videophone access to facilitate charge filing. The EEOC has also expanded its staffing to include bilingual staff who are fluent in languages of individuals in the communities served by our local offices. Additional resources would expand our success in making foreign language online intake available, as well as providing tools to assist those with low literacy and digital literacy skills. Such actions would greatly improve the EEOC’s ability to advance equity for individuals with limited English proficiency (LEP).

C. Tracking Progress

Near- to mid-term indicators: The EEOC will: (1) increase the number of outreach events in remote areas and with underserved populations; (2) continue to track the number of field offices with an expanded intake presence and customer use of those services; (3) track the average time to secure an appointment and wait times via the national call center; and (4) set benchmarks for programmatic and recruitment activities, e.g., identifying organizations, universities and other entities where we can recruit new staff.

Long-term indicators: The EEOC will: (1) create a position dedicated to coordinating outreach efforts to tribal and rural areas that will monitor for discriminatory patterns and ensure that investigations and charges are executed equitably; (2) seek to complete a Spanish-language

online portal that mirrors the current English-language portal to reduce linguistic barriers to the charge filing process, and explore the feasibility of translating the portal into other languages; and (3) gauge and increase the public's satisfaction with the EEOC's services through client feedback surveys.

D. Accountability

Positions responsible for this action: The EEOC's Office of Field Programs (OFP), which will coordinate field activities; Office of the Chief Human Capital Officer (OCHCO), which will lead on staff recruitment; Office of Information Technology (OIT), which will make updates to the online portal; and Office of Enterprise Data and Analytics (OEDA), which will analyze program impact and effectiveness, will undertake this work in coordination with the Office of the Chair.

Accountability for implementing action: The EEOC will consult with the EEOC/Tribal Employment Rights Offices (TERO) joint committee regularly to share progress on this work and gather feedback on the effectiveness of outreach efforts. Additionally, the EEOC will incorporate these efforts into its five-year strategic plan with specific outcomes, goals, and deadlines, as well as in quarterly and annual performance metrics for leadership staff in field offices.

(2) Equity Action Plan: Identifying & Developing Resources for Effective DEIA Strategies

A. The Challenge

Barrier being addressed: As our nation recovers from the pandemic, and employers rehire after historic job losses, America has a critical opportunity to identify barriers and strengthen recruiting and hiring practices to ensure all workers can obtain good jobs. Changing labor market dynamics are creating challenges, but also an opportunity and a new incentive for employers to reexamine recruitment, hiring, promotion and retention practices and ensure that these practices do not create unnecessary barriers to attracting and hiring a diverse range of talented applicants. In addition, people of color have long experienced systemic discrimination and economic inequality. In the wake of multiple tragic events in 2020 that galvanized millions to protest the brutal killings of George Floyd, Breonna Taylor, Ahmaud Arbery, and other persons of color, and to call for racial justice, many employers have expressed an interest in hearing from the EEOC and OFCCP about ways to increase their DEIA efforts consistent with the EEO laws.

Population impacted by the barrier: The primary affected populations are those historically excluded from many employment opportunities because of race, color, ethnicity, gender, LGBTQI+ status, religion, disability, and age. With respect to DEIA in hiring and recruitment, the EEOC will partner with OFCCP to also focus on veterans.

Evidence indicating this barrier meaningfully impacts serving communities equitably: Ensuring equal employment opportunities has always been important to America's success but is even more urgent now to address inequalities due to the pandemic. In April 2020, the pandemic

caused over 16 million people to lose their jobs. As the nation's economy recovers, historically underrepresented communities are the slowest to regain their jobs, even as recently as last month. As employers struggle to fill job openings, Black and Hispanic communities continue to face higher rates of unemployment than white individuals, as evidenced by December 2021 Bureau of Labor Statistics data that showed a jobless rate of 7.1% for Black people, 4.9% for Hispanic people, 3.8% for Asian people, and 3.2% for White people. Additionally, women -- particularly caregivers, and many other demographic groups also have been hit hard by the pandemic; this effort will benefit these workers as well. This moment provides an opportunity for the EEOC to help employers respond to calls for racial justice, address practices that incidentally shut out historically marginalized communities from good jobs and improve DEIA at all levels, consistent with EEO laws.

Near- to mid-term outcome: In the near- to mid-term, the goals of this area of focus are to provide resources and identify strategies to assist employers that wish to recruit, hire and promote individuals from historically underrepresented backgrounds and to increase their ranks in leadership positions.

Long-term success: The long-term goal of this work is to create sustained and widespread understanding about lawful, effective strategies for employers to undertake and benefit from DEIA.

B. The Action

The action that will occur: Together with OFCCP, through HIRE, the EEOC will work to bring together stakeholders to identify and examine effective DEIA strategies for recruitment and hiring. The EEOC and OFCCP will convene in-depth discussions that highlight leading employer, worker, and research efforts to create more equitable hiring practices. This effort will also draw on the EEOC's initiative on the use of artificial intelligence and algorithms in making employment decisions. Future work will also expand to promoting DEIA in retention and representation in management. The goal of this effort is to inform EEOC resources that will identify and bring attention to promising DEIA practices.

Reasons for prioritizing the action: Effective DEIA efforts can proactively expand much-needed opportunities to members of underserved populations, thereby advancing equal employment opportunity. Research has shown that one-time diversity and inclusion trainings are not effective in changing workplace culture. Rather, successful DEIA programs must be part of a broader, sustained organizational effort that goes beyond training. In addition, many organizations have reported that a diverse workforce supports business needs, and they are anxious to respond to related calls from shareholders, clients, and the public to ensure that their workforces fully reflect America's diversity. The EEOC and other agencies are uniquely positioned to help employers create and implement EEO-compliant programs and to evaluate the success of DEIA programs and policies.

Connection to the equity assessment: Because the EEOC affirmatively advances equal employment opportunity, the agency’s mission is supported by DEIA efforts that expand access to good jobs and comply with EEO laws.

Connection between the proposed action and outcome described: HIRE and the related DEIA work the EEOC will conduct can help employers eliminate unnecessary barriers to employment and find strategies to attract and hire qualified workers of all backgrounds. In addition, this initiative has the potential to promote voluntary compliance with EEO laws and prevent discrimination in the workplace.

C. Tracking Progress

Near- to mid-term indicators: The EEOC will maintain DEIA information and resources on its website and will track pageviews for these resources. In addition, the agency intends to convene roundtables with employers as well as discussions with employees and employee organizations to determine what resources would be most helpful in promoting DEIA in recruitment, hiring, retention, and promotion practices.

Long-term indicators: The EEOC will internally assess employment trends in EEO-1 data to determine whether the private sector’s current focus on adopting or increasing DEIA efforts leads to greater employee representation from underrepresented groups, including in management positions. The goal of this analysis would be solely to evaluate the effectiveness of the DEIA initiative, not to inform enforcement activities. The EEOC also will develop internal DEIA promising practices for recruiting, retaining and promoting diverse staff with the goal of assisting public and private employers in setting and achieving DEIA goals.

D. Accountability

Positions responsible for this action: The EEOC’s Office of Legal Counsel (OLC), OEDA, and Office of Communications and Legislative Affairs (OCLA) will lead this work in coordination with the Office of the Chair.

Accountability for implementing action: This action will release updates on the long-term indicators described here to show progress on this work. The EEOC will also convene roundtables with employers and civil rights groups at least semi-annually to obtain feedback on released guidance and to solicit ideas on topics for future technical assistance.

(3) Equity Action Plan: Improving Data Collection, Reporting & Analysis to Help Advance Employment Opportunities for Vulnerable Populations and Underserved Communities

A. The Challenge

Barrier being addressed: The EEOC collects a variety of data related to employees and employment discrimination, which could be put to greater use in addressing systemic and other forms of discrimination. These include EEOC’s workforce data collections (i.e., EEO-1, EEO-3,

EEO-4 and EEO-5 reports, or collectively EEO reports) and data on charges and findings of discrimination. The EEO reports require workforce demographic information by sex, race/ethnicity, and job category and are used to evaluate potential patterns of discrimination and investigate discrimination charges. The data are essential to EEOC's systemic investigations, which focus on broad patterns or practices of discrimination in certain industries, occupations, geographic regions, or companies. EEOC often receives requests to expand the specificity of the race/ethnicity and gender categories in its EEO reports to capture more detailed information and is considering these requests (e.g., to disaggregate the Native Hawaiian or Other Pacific Islander category into Native Hawaiian, Guamanian/Chamorro, Samoan, Other Pacific Islander or to collect information about the gender identity of workers that goes beyond the binary "male" and "female" categories).

In addition, the EEOC's existing charge data show that some forms of discrimination (e.g., hiring discrimination against Black workers) have been persistent and particularly difficult to ameliorate notwithstanding the EEOC's work. Enhanced analyses of EEOC's various internal data sources as well as those from external sources may help better understand various forms of discrimination, which could lead to more robust and targeted enforcement and education efforts.

Population impacted by the barrier: The populations primarily impacted are those historically subjected to discrimination or occupational segregation in the workplace, including people of color, immigrants, women, caregivers, LGBTQI+ individuals, and people with disabilities.

Evidence indicating this barrier meaningfully impacts serving communities equitably: All the data that EEOC collects from various sources, including, but not limited to the EEO reports, has proved useful in the EEOC's enforcement work. Ensuring that the agency makes the most effective use of these data and collects the appropriate categories of data will help the EEOC better focus its outreach, training, and investigative resources by more readily identifying patterns of potential discrimination.

Near- to mid-term outcome: In the near- to mid-term, the goals of this area of focus are: (1) to determine whether additional demographic categories should be included in the EEOC's workforce data collections, (2) to create an internal working group to establish specific goals, deliverables, and timetables for enhancing the EEOC's internal data systems and analyses to maximize their use in EEOC's systemic enforcement, and (3) to identify topics regarding which EEOC can issue reports using its existing data.

In 2020, the EEOC completed its first historic collection of pay data from private sector employers. The National Academies of Sciences is currently reviewing the data from that collection, which will inform future pay data collection by the agency. The agency will develop near-, mid-, and long-term goals with respect to pay data after receiving the panel's report.

Long-term success: The long-term goals of this work are to (1) maximize the use and analysis of the EEOC's data collections to provide a more robust view of the state of EEO in the

workplace, (2) to expand public access to aggregate online workforce data, consistent with protections for employer confidentiality and employee privacy; and (3) implement a government-wide EEO complaint tracking system that gives real-time access to federal agency EEO complaint activity, which can serve as model for a non-federal complaint tracking system.

B. The Action

The action that will occur: The EEOC will: (1) update demographic categories on relevant internal EEOC forms (e.g., EEOC charge forms); (2) explore ways to make EEO data more accessible through the [public interactive data query and mapping tool](#); (3) perform more targeted and deeper analysis of existing internal and charge data; and (4) determine whether to expand its existing EEO data collections, including to better identify intersectional discrimination.

Reasons for prioritizing the action: A more rigorous review of complaint/charge and investigation data could inform where and how the EEOC could better serve historically underserved communities. In addition, a systematic review of workforce trends and data will help the EEOC determine where barriers to employment exist, thereby enabling the EEOC to engage in more targeted and effective enforcement. At the same time, making aggregate EEO data widely available to and more easily accessible by the public could help educate organizations, researchers and individuals about potential trends, barriers, or disparities in particular industries, occupations, or geographic locations.

Connection to the equity assessment: Appropriate data collection and effective data analyses will help the EEOC better focus its resources to assist underserved communities by updating technical assistance and policy guidance, conducting more or different outreach, and identifying areas for systemic investigations.

Connection between the proposed action and outcome described: Updating and analyzing data will help expose underlying discriminatory practices for EEOC enforcement. Facilitating public access to aggregate data will assist organizations and individuals in identifying and addressing barriers, gaps, or disparities in certain industries, jobs, or geographic locations, including occupational segregation.

C. Tracking Progress

Near- to mid-term indicators: The near-term indicators will be (1) drafting updates to EEOC forms (such as the EEOC's charge form) related to gender self-identification; and (2) determining whether and if so how, to update data categories on the EEO-1 form, which would require approval by vote of the full Commission as well as OMB approval under the Paperwork Reduction Act. Mid-term indicators will focus on updating internal and external systems to better analyze collected data, as well as publicizing portals and online tools that allow users to more easily access and use aggregate data.

The EEOC will make an evidence-based determination as to whether adding demographic categories to its workforce data collections will enhance the Commission's ability to address unlawful discrimination. Because the accuracy of any new data collection will depend, in part, on employees' and union members' willingness to voluntarily disclose potentially sensitive data (e.g., race, ethnicity, sexual orientation, gender identity, or disability status) to their employers, the EEOC likely would need to engage in broad public education to obtain reliable data.

Long-term indicators: The EEOC will update its website annually and solicit feedback from civil rights advocates, labor groups, employer groups, and relevant stakeholders to determine whether reported data is accessible and useful. For internal analysis of charge and investigation data, the EEOC will (1) develop a complaint tracking system that will allow real-time analysis across various datasets within the federal sector; and (2) identify and analyze persistent disparities in investigation, litigation and settlement outcomes to develop and implement mechanisms to create more equitable outcomes.

D. Accountability

Positions responsible for this action: The EEOC's OEDA and OCLA will bear primary responsibility for carrying out this action.

Accountability for implementing action: This action will track and publicly report usage of the public-facing website and identify possible enforcement or workplace discrepancies.

(4) Equity Action Plan: Improving EEOC Educational Materials and Website to Address the Needs of Individuals with Limited English Proficiency, Disabilities or Limited Literacy

A. The Challenge

Barrier being addressed: Much of the EEOC's website and the majority of EEOC's educational materials currently are only accessible to those with a high degree of English literacy and the capability to access online resources.

Population impacted by barrier: The populations primarily impacted are individuals with limited English proficiency (LEP), individuals with low literacy, and those whose disabilities limit their ability to access online resources.

Evidence indicating this barrier meaningfully impacts serving communities equitably: One of the primary ways that people access our educational materials is on the EEOC website, which receives well over two million pageviews each month. Although the website is invaluable to those who can access its materials, underserved communities will not benefit from the website if they are unable to effectively access its resources or understand what constitutes unlawful discrimination at work and how to file a charge.

Near- to mid-term outcome: In the near- to mid-term, the goals of this area of focus are to identify the most visited EEOC webpages and translate them into languages other than English and provide auditory resources for those with limited reading proficiency. The EEOC will also explore making its educational materials available in other forums, such as radio or print.

Long-term success: The long-term goal of this work is to increase the language diversity and readability of materials for LEP, low-literacy and disabled individuals accessing EEOC resources and services, including charge filing.

B. Action and Intended Impact on Barrier

The action that will occur: The EEOC will (1) review and update its website to ensure that its most important and frequently reviewed materials can easily be accessed in multiple languages; (2) reconvene its language access working group and solicit feedback from public sector EEO professionals to ensure that EEOC's materials are accessible, understandable, and relevant to LEP, low-literacy and disabled individuals; (3) consider making key materials available in alternative formats, including print and radio; and (4) improving accessibility services by creating staff positions specifically focused on improving accessibility literacy across the agency.

Reasons for prioritizing the action: Updating the website and making publications available offline and in different formats will send a message to LEP, low-literacy and disabled communities that the EEOC is here to serve and assist them and will empower those individuals with information they can use to understand and enforce their rights under the EEO laws. This will also assist the agency's efforts to combat pandemic-related anti-AANHPI bias by improving outreach to AANHPI persons who have been subjected to discrimination.

Connection to the equity assessment: The EEOC's equity assessment revealed that the EEOC website, which is limited to English and some Spanish, is a potential barrier for those who are limited in their ability to read English or Spanish. Translating webpages and materials into additional languages will significantly reduce those barriers. The EEOC can further reduce barriers by producing more audio content both in English and in other languages for LEP, low-literacy and disabled individuals.

Connection between the proposed action and outcome described: In reviewing the EEOC's outreach and education activities, we believe that increasing the number of educational materials that are available in Spanish and other languages will allow the agency to better reach LEP individuals. In addition, these materials could be improved to reach a wider range of employees or applicants with disabilities or limited literacy skills, for example, through more appealing graphics, audio content or videos using American Sign Language.

C. Tracking Progress

Near- to mid-term indicators: In the near term, the EEOC will track the number of pageviews for non-English translated pages to determine whether they are being accessed by the intended

audience. In the mid-term, the EEOC will also solicit feedback from advocacy groups that represent LEP, disabled or low-literacy individuals and other stakeholders, including those who require auditory support, to determine what resources should be prioritized for translation and supplemental content and outreach.

Long-term indicators: The EEOC will leverage market research, focus groups and other mechanisms used in the private sector to gauge whether outreach and resources targeted at LEP, disabled or low-literacy individuals is effective.

D. Accountability

Positions responsible for this action: The EEOC's OCLA will bear the primary responsibility for carrying out this action with the support of OIT.

Accountability for implementing action: The EEOC will establish the baseline for pageviews of non-English/Spanish resources and include the number of unique pageviews in its internal annual organizational assessments. For resources that have a high number of pageviews, the EEOC will explore publishing, printing and distributing simplified versions of the documents at field offices or with organizations that provide services for individuals in the workforce.

Conclusion

The EEOC continues to work toward an America where all people have a fair chance to obtain employment, provide for their families, and contribute to our economy. The Commission is firmly committed to this goal and looks forward to implementing its equity plan to help achieve it.