

**Office of the Comptroller of the Currency  
(OCC)**

**Fiscal Year 2018**

**Management Directive (MD-715)  
Report**

**MD-715**  
**Parts A Through E**

**Part A - Department or Agency Identifying Information**

Agency	Second Level Component	Address	City	State	Zip Code (xxxxx)	Agency Code (xxxx)	FIPS Code (xxxx)
Department of Treasury	Office of the Comptroller of the Currency (OCC)	Constitution Center, 400 7 <sup>th</sup> Street, SW	Washington	DC	20219	TR AJ	11001

**Part B - Total Employment**

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	3823	20	3843

**Part C.1 - Head of Agency and Head of Agency Designee**

Agency Leadership	Name	Title
Head of Agency	Joseph M. Otting	Comptroller of the Currency
Head of Agency Designee		

**Part C.2 - Agency Official(s) Responsible for Oversight of EEO Program(s)**

EEO Program Staff	Name	Title	Occup. Series (xxxx)	Pay Plan and Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
Principal EEO Director/Official	Joyce Cofield	Executive Director	0301	NB-08	202-649-6892	Joyce.Cofield@occ.treas.gov
Affirmative Employment Program Manager	Joyce Cofield	Executive Director	0301	NB-08	202-649-6892	Joyce.Cofield@occ.treas.gov
Complaint Processing Program Manager	Rebecca Tudisco	EEO Officer	0260	NB-06	202-649-6893	Rebecca.Tudisco@occ.treas.gov
Diversity & Inclusion	Betty Washington	Diversity & Inclusion Program Manager	0301	NB-06	713-336-4353	Betty.Washington@occ.treas.gov

<b>EEO Program Staff</b>	<b>Name</b>	<b>Title</b>	<b>Occup. Series (xxxx)</b>	<b>Pay Plan and Grade (xx-xx)</b>	<b>Phone Number (xxx-xxx-xxxx)</b>	<b>Email Address</b>
Officer						
Hispanic Program Manager (SEPM)	Elena Olivera	Hispanic Employee Network Group President/Hispanic Program Manager To Be Determined (TBD)	0570	NB-05	415-765-2126	Elena.Olivera@occ.treas.gov
Women's Program Manager (SEPM)	Rachel Bayless	Women Network President/NBE Examiner-in-Charge	0570	NB-07	415-805-3012	Rachel.Bayless@occ.treas.gov
Disability Program Manager (SEPM)	TBD	Disability Program Co-Liaisons/OMWI Staff				
	David Andersen	Disability Program Co-Liaisons/ District Recruitment Specialist	0201	NB-05	917-344-4526	David.Andersen@occ.treas.gov
Special Placement Program Coordinator (Individuals with Disabilities)	Harnet Reddy	Selective Placement Program Coordinators/Human Resource Specialist/ Recruitment	0201	NB-05	202-649-5264	<a href="mailto:Sam.Reddy@occ.treas.gov">Sam.Reddy@occ.treas.gov</a>
	Natasha Schmidt				202-649-6662	Natasha.Schmidt@occ.treas.gov
Reasonable Accommodation Program Manager	Kelly Gauvin	Reasonable Accommodation Coordinator/Human Resources Specialist	0201	NB-05	202-649-6636	GAUVINKL@occ.treas.gov
Anti-Harassment Program Manager	Linda Medina	Anti-Harassment Program Manager/Human Resources Specialist	0201	NB-05	202-649-6638	Linda.Medina@occ.treas.gov
ADR Program Manager	Cheryl Lewis	Equal Employment Specialist	0260	NB-06	202-649-7175	Cheryl.Lewis@occ.treas.gov
Compliance Manager	N/A					
Principal MD-715 Preparer	Valerie Tucker	Program Analyst (EEO)	0343	NB-05	202-649-6460	Valerie.Tucker@occ.treas.gov
Other EEO Staff						

## Part D.1 – List of Subordinate Components Covered in this Report

Please identify the subordinate components within the agency (e.g., bureaus, regions, etc.).

If the agency does not have any subordinate components, please check the box.

Subordinate Component	City	State	Country (Optional)	Agency Code (xxxx)	FIPS Codes (xxxxx)
Northeastern District Office	New York	NY			
Central District Office	Chicago	IL			
Southern District Office	Dallas	TX			
Western District Office	Denver	CO			
Large Bank Supervision	Nationwide				
Headquarters	Washington	DC			

## Part D.2 – Mandatory and Optional Documents for this Report

In the table below, the agency must submit these documents with its MD-715 report.

Did the agency submit the following mandatory documents?	Please respond Yes or No	Comments
Organizational Chart	Yes	
EEO Policy Statement	Yes	
Strategic Plan	Yes	
Anti-Harassment Policy and Procedures	Yes	
Reasonable Accommodation Procedures	Yes	
Personal Assistance Services Procedures	Yes	
Alternative Dispute Resolution Procedures	Yes	

In the table below, the agency may decide whether to submit these documents with its MD-715 report.

Did the agency submit the following optional documents?	Please respond Yes or No	Comments
Federal Equal Opportunity Recruitment Program (FEORP) Report	Yes	
Disabled Veterans Affirmative Action Program (DVAAP) Report	Yes	

Did the agency submit the following optional documents?	Please respond Yes or No	Comments
Operational Plan for Increasing Employment of Individuals with Disabilities under Executive Order 13548	Yes	
Diversity and Inclusion Plan under Executive Order 13583	Yes	
Diversity Policy Statement	No	
Human Capital Strategic Plan	No	
EEO Strategic Plan	No	
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	Yes	

## Part E – Executive Summary

All agencies must complete Part E.1; however, only agencies with 199 or fewer employees in permanent FT/PT appointments are required to complete Part E.2 to E.5. Agencies with 200 or more employees in permanent FT/PT appointments have the option to Part E.2 to E.5.

### Part E.1 - Executive Summary: Mission

The Office of the Comptroller of the Currency (OCC), created in 1863, charters, regulates, and supervises national banks and federal savings associations and licenses, regulates, and supervises the federal branches and agencies of foreign banks. The OCC is an independent, non-appropriated bureau of the U.S. Department of the Treasury. Its mission is to ensure that these institutions operate in a safe and sound manner, provide fair access to financial services, treat customers fairly, and comply with applicable laws and regulations. While bank supervision is the core mission of the OCC and the majority of its employees are bank examiners, examination activities are supported by a variety of other professions.

### Part E.2 - Executive Summary: Essential Element A - F

N/A

### Part E.3 - Executive Summary: Workforce Analyses

As of September 30, 2018, the OCC had 3,843 employees (3,823 permanent and 20 temporary). This number reflects a decline of 2.9 percent below the 3,956 employees (3,930 permanent and 26 temporary) in FY 2017. Generally, all major demographic groups experienced a decline in population. When reviewing the OCC's workforce demographics, benchmark comparisons are made against the 2010 national civilian labor force (NCLF)<sup>1</sup> availability rates and the occupational civilian labor force

<sup>1</sup> NCLF data are derived from the 2010 census reflecting persons 16 years of age or older who are employed or are actively seeking employment and adjusted for citizenship, excluding those in the Armed Services.

(OCLF) availability rates for the OCC's three major occupational groups—bank examiners, attorneys, and economists. In addition, the Treasury Department provided a more realistic benchmark comparison for the OCC's overall workforce than the NCLF rate—known as the relevant civilian labor force (RCLF). The RCLF rate is based on the OCC's occupational composition and total workforce annually. The 2018 RCLF rate was calculated by comparing the OCLF availability rate from the 2010 census data with the percentage availability rate of each occupation represented in the OCC's workforce as of September 30, 2018.

## **Part E.4 - Executive Summary: Accomplishments**

In May and June of 2018, OCC employees participated in the Federal Employee Viewpoint Survey (FEVS), designed to measure employees' perceptions of workplace conditions conducive to fostering employee engagement. FEVS topics include direct supervision, work unit, leadership, diversity, performance management, recognition, pay, work-life balance, and training and development. The 2018 FEVS invited all permanent OCC employees as of October 28, 2017, to participate. More than 2,940 OCC employees completed the survey, representing a 77.2 percent response rate, an increase of 0.8 percent from 2017. OCC employees responded more favorably in all major categories than the rest of the government and the Treasury Department. OCC employees responded most favorably to questions in the categories for Supervisors (84.0 percent) and Work Experience (78.2 percent). The OCC's Employee Engagement Index and Global Satisfaction Index scores (74.3 percent and 75.1 percent, respectively) exceeded those of the Treasury Department (68.3 percent and 62.2 percent, respectively) and the federal government (67.7 percent and 64.4 percent, respectively). The FEVS results also include a diversity and inclusion index (New IQ) created by the U.S. Office of Personnel Management (OPM) that considers responses to questions addressing fairness, open-mindedness, cooperativeness, supportiveness, and empowerment. The OCC's New IQ index score remained stable at 69.4 percent in 2018 (69.0 percent in 2017), higher than that of the Treasury Department (61.9 percent) and the federal government overall (61.0 percent).

The Partnership for Public Service uses a proprietary formula to analyze data from the FEVS to create "The Best Places to Work in the Federal Government" rankings. Based on the 2018 data, the OCC ranked 53 of 415 agency subcomponents. Our 2018 ranking places us in the top 13 percent in our category, as compared to the top 15 percent in the 2017 rankings (51 of 339 last year). In other categories measured by the Partnership, the OCC ranked 29 in training and development and 44 in support for diversity.

For the third time in a row, *Training* magazine rated the OCC among the "Training Top 125" organizations in the nation that are "unsurpassed in harnessing human capital." The OCC earned the award for its design and development of a new National School and the agency's efforts throughout the Human Capital, Leadership and Career Development program areas, which included a competency model and curriculum for every level of leadership within the OCC. Additionally, the magazine recognized the OCC's innovation by the use of virtual and blended learning and the use of role-play in the classroom, all aimed to better support formal and informal learning and on-the-job training and performance.

### **OCC 2018 Areas of Focus**

During this reporting cycle, the OCC continued to address the following areas in which deficiencies, triggers (disparities), and barriers were identified in its FY 2017 report:

1. Increasing the use of alternative dispute resolution (ADR) during the equal employment opportunity (EEO) pre-complaint process.
2. Increasing the number of reasonable accommodation (RA) requests processed within the agency's

procedures.

3. Increasing the participation of Hispanics in the agency.
4. Increasing the participation of female bank examiners.
5. Increasing the participation of females and minorities in supervisor roles and senior-level positions (SLP).
6. Increasing the participation of individuals with disabilities.

#### *1) Increasing the Use of ADR During the EEO Pre-Complaint Process*

The Treasury Department's goal is to process 45.0 percent of completed EEO pre-complaints using ADR in lieu of traditional EEO counseling. The OCC offers ADR services to all eligible participants annually. In FY 2018, the OCC's ADR participation rate was 41.7 percent, a slight decrease from 44.1 percent in FY 2017. Of the 48 cases completed in FY 2018, 38 (79.2 percent) were eligible for ADR (20 participated and 18 declined) and 20.8 percent (10 cases of 48) were ineligible for ADR based on the OCC's ADR policy (two external applicants, one anonymous complainant, four employment terminations, and three other non-employees). The OCC's policy provides that cases involving an anonymous complainant; non-selection of an external applicant for employment; termination, including termination during a probationary period, or other non-employees; criminal activity; and waste, fraud, or abuse, are ineligible for ADR. Of the 38 eligible cases in FY 2018, 20, or 52.6 percent, participated in ADR, compared with 55.6 percent in FY 2017 (of 19 eligible cases, eight participated in ADR). Most of those individuals who were eligible for ADR and declined to participate expressed skepticism that ADR would be effective.

The OCC continues to promote its ADR Program as an alternative means of conflict resolution. An introduction to the ADR Program is included in mandatory training for new employee hires and new managers and supervisors.

In addition, the OCC held a week-long observance during Treasury Dispute Prevention Week, to highlight the benefits of ADR and market the OCC's ADR Program. During Dispute Prevention Week, OCC employees were provided an opportunity to participate in a Treasury-wide webinar entitled "Understanding the Civility Spectrum in the Workplace." The webinar provided techniques for employees to learn to promote courtesy, respect, and collaboration and how they impact workplace culture and productivity. Employees were also provided daily tips regarding ADR through the agency's electronic bulletin boards and announcements in "What's New at the OCC," an agency weekly newsletter emailed to all employees and available on the agency's intranet site. Actions to improve the ADR participation rate are described in Part H.

#### *2) Increasing the Number of RA Requests Processed Within the Agency's Procedures*

In FY 2018, the OCC completed the implementation of its action plan from the formal review of the RA Program, which began in FY 2016. This included publishing a revised RA policy and procedures, and conducting several RA awareness training sessions for manager groups across the agency and training at the Disability Awareness event.

In FY 2018, the OCC exceeded the MD-715 metric set for RA requests processed in a timely manner (97.2 percent vs. 90.0 percent) as set forth in the agency's procedures. Accordingly, the OCC closed out the RA plan. Actions taken to increase the number of RA requests processed within the agency's prescribed time frame are described in Part H.

#### *3) Increasing the Participation of Hispanics in the Agency*

The OCC continues to work to address the low participation rate of Hispanics in its workforce. In FY 2018, the Hispanic participation rate increased to 7.3 percent from 7.0 percent in FY 2017, an improvement from 5.1 percent in the OCC's FY 2005 baseline year. The OCC's Hispanic workforce participation rate (7.3 percent) remains below the NCLF rate of 10.0 percent, but at parity with the RCLF rate of 7.3 percent.

The low workforce participation rate of Hispanics is largely influenced by low participation in the OCC's

non-major occupational groups (7.6 percent vs. 10.0 percent NCLF rate), specifically by Hispanic males. Hispanic males in non-major occupational groups participated at 3.0 percent in the workforce, below the 5.2 percent NCLF. Hires of Hispanic males in non-major occupational groups exceeded their NCLF (6.9 percent vs. 5.2 percent); and their separations were below their workforce participation rate (2.5 percent vs. 3.0 percent).

In addition, the OCC's overall low participation rate of Hispanics is influenced by Hispanic bank examiners, specifically Hispanic females. The workforce participation rate of Hispanic female bank examiners increased in FY 2018 to 3.2 percent, from 2.9 percent in FY 2017, and remains below the OCLF rate of 3.7 percent. In FY 2018, Hispanic female bank examiners were hired at a rate greater than their OCLF rate (15.3 percent vs. 6.8 percent), and separated below their workforce participation rate (2.1 percent vs. 3.7 percent).

The applicant flow analysis conducted on the entry-level bank examiner recruitment campaigns in 2018 reflected no statistically significant shift in the ethnic composition of the applicant pool as applicants progressed through the decision process. To further study the hiring process at the OCC, an applicant flow analysis was conducted on job vacancies processed by the OCC and closed during the first three quarters of FY 2018. Preliminary results indicated no statistical difference between the percentage of Hispanics who applied and who were selected.

The OCC continued to benefit from the activities of its Hispanic employee network group (ENG), the Hispanic Organization for Leadership and Advancement (HOLA). HOLA members served as recruiters/screeners and interview panelists during the entry-level bank examiner and attorney recruitment campaigns and participated in the recruitment and screening processes for experienced/industry hires. HOLA members also represented the agency at various career forums and fairs and networking events. To support retention, HOLA continued to encourage networking, mentoring, and collaboration among its members. The OCC will continue its focus in this area in FY 2019. Actions to increase the participation of Hispanics in the agency are described in Part I.

#### *4) Increasing the Participation of Female Bank Examiners*

The OCC's population of female bank examiners increased slightly in FY 2018 to 39.1 percent from 38.9 percent in FY 2017, but remains below the OCLF rate of 45.3 percent. The 34.7 percent hiring rate of female bank examiners was below the OCLF availability rate (45.3 percent). The OCC's applicant flow data analysis of the 2018 entry-level recruitment campaigns showed females, on average, were only 35.2 percent of the applicant pools; however, females were hired at a rate of 39.3 percent, but below the OCLF rate (45.3 percent). In addition, the OCC conducted a separate applicant flow analysis on examiner vacancies closed during the first three quarters of FY 2018. The analysis showed females were 38.3 percent of the applicant pool and 40.2 percent of the selections, both below the OCLF rate (45.3 percent). There was no evidence of a statistically significant shift in the gender composition of the applicant pool as they progressed through the various stages of the decision process.

During FY 2018, female bank examiners separated at a rate (34.6 percent) below their workforce participation rate (39.1 percent), hiring rate (34.7 percent), and their rate of separation in FY 2017 (35.1 percent).

Retirements accounted for 49.2 percent, and resignations accounted for 47.7 percent of separating female bank examiners in FY 2018. Of the resignations, 51.6 percent were new hires (six or fewer years of employment) and 48.4 percent were mid-career employees (not new hires and not eligible for retirement).

In FY 2018, the retirement eligibility pool (currently eligible and expected to obtain eligibility within five years) for female bank examiners was 30.2 percent, compared with an average of 30.7 percent over the past five years. Because of the years of historical growth in the retirement eligibility pool before FY 2017, as well as the resignations and transfers of new hires, retention of female bank examiners remains a challenge and therefore will continue to be monitored in the future.

Job stress, office morale, travel requirements, and career growth were the reasons most often cited by separating female bank examiners in the FY 2018 exit surveys, which are comparable with agency-wide

survey results, with the exception of travel requirements. By identifying the areas of greatest concern for female bank examiners, the OCC can better understand contributing factors, target retention efforts, and develop strategies that align with the agency's overall mission and diversity and inclusion goals.

The OCC offers flexible work arrangements, including flex days, gliding work schedules to enable varying arrival and departure times, credit hours, and telework arrangements. A majority of employees take advantage of these work arrangements: 85.5 percent flex, 67.5 percent vary their work schedules, and 89.0 percent telework, with 63.0 percent of employees teleworking either on a recurring or situational basis at least once a month during the year.

The OCC's Office of Minority and Women Inclusion (OMWI) continued to work collaboratively with Bank Supervision management to identify barriers that could impede the realization of diversity goals specifically oriented to female bank examiners. Management briefings highlighted departmental workforce trends and areas requiring special attention, including targeted recruitment, retention strategies, and succession planning.

Bank Supervision management sponsors focus group sessions with entry-level bank examiners to capture their feedback on the agency's hiring and on-boarding processes, training programs, on-the-job experiences their first year, and perceptions of OCC examiner culture. In FY 2018, the process for collecting new examiner feedback continued to include Midsize and Community Bank Supervision (MCBS) and Large Bank Supervision (LBS) training team members at the 6-month and 12-to-18-month points in their OCC employment. The process is facilitated by the OCC's Organizational Development (OD) unit and the feedback is shared with the appropriate business lines. OD consultants use surveys and focus groups to gather feedback and prepare a summary for each hiring round. The feedback that is gathered from new examiners is used by MCBS and LBS to improve their training team and new examiner development processes. In FY 2018, 10 surveys and focus group sessions were conducted.

Each year, the MCBS department sponsors a career forum for bank examiners in pay band NB-IV at the end of their third year of employment. The forum provides information about bank examiner career opportunities and explains the Uniform Commission Examination (UCE) preparatory process. In FY 2018, MCBS sponsored a career forum for NB-IV pre-commissioned examiners from the Class of 2014. The forum provided the opportunity to network with other employees, learn more about and effectively prepare for the UCE, discuss career opportunities with agency leaders, and hear about current agency issues. In FY 2018, three UCE testing sessions were held. Sixty-nine bank examiners successfully passed, of whom 46.4 percent (32) were females, up from 26.6 percent in FY 2017. In addition, 10.1 percent (7) were Hispanics, 5.8 percent (4) were Blacks, and 4.3 percent (3) were Asians; 5.8 percent (4) were individuals with disabilities. All of these groups passed the UCE in FY 2018 at rates greater than in FY 2017, except Asians.

In FY 2018, the OCC's MCBS department also sponsored a career forum for bank examiners who are in pay band NB-V and received their commissions in 2016 and the first session of 2017. The main focus of the forum was to provide bank examiners with exposure to the career choices available in the bank supervision lines of business, hear about resources and factors to consider when making OCC career decisions, and network with senior leaders throughout the agency.

The EXCEL I Program, sponsored by the LBS department, provides NB-V bank examiners with the opportunity to develop expertise in one of eight specialty areas. Interested bank examiners apply for permanent bank examiner positions within LBS and become part of a developmental team in one of the specialty areas for a 12- to 24-month period. Upon successful completion of the program, candidates remain in LBS to work within their specialty areas as members of a large bank resident team. In FY 2018, 13 bank examiners were selected in EXCEL I classes: 23.1 percent (3) were females, 15.4 percent (2) were Blacks, 7.7 percent (1) were Asians, and 7.7 percent (1) were individuals with disabilities.

The OCC has long benefited from the value provided by The Women's Network (TWN). In FY 2018, TWN supported the retention of female bank examiners through its mentoring circles that included "Career Exploration I," "Career Exploration II," "Work/Life Balance," "Uniform Commission Examination Preparation," "Leadership I," and "Leadership II."

The OCC will continue its focus in this area in FY 2019. Actions to increase the participation of female bank examiners in the agency are described in Part I.

#### *5) Participation of Females and Minorities in Supervisor Roles and SLP*

In FY 2018, females participated at 45.1 percent in the OCC workforce and held 39.5 percent of supervisor positions and 32.1 percent of SLP, up from FY 2017 participation rates by 1.2 percentage points and 1.1 percentage points, respectively. Minorities participated in the workforce at 35.1 percent and held 26.2 percent of supervisor positions and 25.0 percent of SLP, up from FY 2017 participation rates by 1.0 percentage points and 4.3 percentage points, respectively.

The OCC launched its Leadership Exploration and Development (LEAD), an enterprise-wide leadership development program targeted to employees at the NB-V to NB- VI.2 levels. LEAD is an 18-24 month program designed to build leadership competencies for aspiring team leaders and managers and to foster broader, enterprise perspectives for participants. LEAD supports the OCC's retention goals by strengthening leadership capabilities and providing career development for aspiring leaders. In its first year, there were 17 participants: 52.9 percent (9) were females, 17.6 percent (3) were Blacks, 11.8 percent (2) were Hispanics, and 5.9 percent (1) were individuals with disabilities.

In addition, the OCC continued to administer a robust Executive Coaching Program, sponsor the Leadership Institute Speaker's Series, and hold informational Manager Forums to educate managers on various leadership development topics.

Moreover, the OMWI continued its Hispanic barrier analysis study with a review of its workforce data, specifically of Hispanic participation in GS-13 through senior executive service (SES) equivalent positions (NB-V through NB-IX). The mandated barrier analysis is in compliance with the requirement set forth in the Equal Employment Opportunity Commission (EEOC) and OPM's memorandum of January 18, 2017, regarding Hispanics in the federal workforce.

The OCC will continue its focus in this area in FY 2019. Actions to address the disparity of minorities and females in supervisor positions and SLP are described in Part I.

#### *6) Increasing the Participation of Individuals with Disabilities*

In FY 2018, the workforce participation rate of individuals with disabilities increased to 8.8 percent from 8.3 percent in FY 2017, but remained below the EEOC's goal of 12.0 percent. The OCC hired individuals with disabilities (12.3 percent) at rates above the EEOC's 12 percent goal, their workforce participation rate (8.8 percent), and their FY 2017 hiring rate (6.3 percent). Individuals with disabilities separated (8.4 percent) in FY 2018 at rates below their participation in the workforce (8.8 percent) and below their FY 2017 separation rate of 8.5 percent.

The low workforce participation rate of individuals with disabilities is largely influenced by low participation in the agency's mission-critical/major occupations (MCO)—bank examiners, attorneys, economists, and IT specialists. Between FY 2014 and FY 2018, MCO represented, on average, 79.6 percent of the agency's workforce collectively. Individuals with disabilities in MCO (5.7 percent) participated below the EEOC goal of 12.0 percent between FY 2014 and FY 2018; all groups increased their participation rates, and IT specialist increased by 3.9 percentage points.

Individuals with disabilities in MCO were hired (6.3 percent) on average between FY 2014 and FY 2018, below the EEOC goal of 12.0 percent. In FY 2018, half of the OCC hires with disabilities were in MCO (50.0 percent), representing 10 hires (one economist and nine bank examiners).

Separations of individuals with disabilities in MCO from FY 2014 through FY 2018 averaged 7.5 percent, which is above their average workforce participation rate of 5.7 percent. There was only one economist separation in five years. In FY 2018, individuals with disabilities in bank examiner positions (5.9 percent) separated below their workforce participation rate (6.6 percent).

The OCC's OMWI office established a cross-functional Disability Working Group to help create the framework for the Disability Program and a Disabilities ENG. This includes input into the agency's

Disability Barrier Plan and its Affirmative Action Plan for Persons with Disabilities, in Part J of this report. In FY 2018, the Working Group identified the focused priorities and began drafting an action plan.

In addition to the agency's efforts to hire individuals with disabilities, the OCC continued to enhance existing training design, development, and delivery methods to ensure that all educational deliverables and live instructional events are 508 compliant and accessible for individuals with disabilities. Enhancement efforts included (1) remediated and added three courses to ensure 508 compliance, (2) developed, tested, and implemented new 508-compliant templates for all training products ensuring that all new course development activities and major revisions will be fully compliant when delivered, and (3) implemented new process standards for all course development and design work that include adherence to 508 standards and testing to verify compliance.

Actions to increase the participation of individuals with disabilities, particularly in MCO within the agency, are described in Part J, "Affirmative Action Plan for Persons with Disabilities."

## **Part E.5 - Executive Summary: Planned Activities**

In FY 2019, the OCC will continue to address the following areas of deficiencies, triggers (disparities), and barriers identified in this year's report:

1. Increasing the use of ADR during the EEO pre-complaint process.
2. Increasing the participation of Hispanics in the agency.
3. Increasing the participation of female bank examiners.
4. Increasing the participation of females and minorities in supervisor roles and SLP. Study the Hispanic participation in GS-13 through SES equivalent positions (NB-V through NB-IX).
5. Increasing the participation of individuals with disabilities.

**CERTIFICATION of ESTABLISHMENT of CONTINUING  
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS**

I, Joyce B. Cofield am the  
(Insert name above) (Insert official title/series/grade above)

Principal EEO Director/Official for Office of the Comptroller of the Currency (OCC)  
(Insert Agency/Component Name above)

The agency has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and, as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program, are included with this Federal Agency Annual EEO Program Status Report.

The agency has also analyzed its work force profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice is operating to disadvantage any group based on race, national origin, gender or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.

Signature of Principal EEO Director/Official  
 Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.

Date

Signature of Agency Head or Agency Head Designee

Date

## MD-715 – Part H

### Agency EEO Plan to Attain the Essential Elements of a Model EEO Program

Please describe the status of each plan that the agency has implemented to correct deficiencies in the EEO program.

If the agency did not address any deficiencies during the reporting period, please check the box.

#### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Efficiency	For FY 2010, the U.S. Department of the Treasury's goal was that at least 35.0 percent or more of those entering the equal employment opportunity (EEO) informal process participate in Alternative Dispute Resolution (ADR); OCC's participation rate was 29.4 percent (five of 17). In FY 2012, the Treasury Department increased the participation goal to 45.0 percent. In FY 2018, the OCC's participation rate was down slightly from the previous year's rate of 44.1 percent to 41.7 percent (20 of 48).

#### Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
11/01/2010	Increase ADR participation rate during the EEO pre-complaint process to meet the Treasury Department's goal.	09/30/2022	10/01/2018	

#### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Executive Director, Office of Minority and Women Inclusion	Joyce Cofield	Yes

#### Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
06/30/2017	Analyze survey response data to determine if there are any best practices that the OCC	Yes		09/30/2018

	ADR Program can benefit from implementing.			
08/30/2017	Conduct a Managers Forum on ADR to promote ADR as a resource for addressing workplace disputes.	Yes	09/30/2019	
09/30/2017	Continue to provide information on ADR to employees through the New Hire Orientation and other employee briefings.	Yes		09/30/2018
09/30/2017	Continue to review EEO intake forms where ADR was offered but not accepted, and analyze reasons why ADR was declined.	Yes		09/30/2018
09/30/2017	Continue to use and analyze feedback provided on ADR participant surveys.	Yes		09/30/2018
09/30/2017	Continue periodic meetings with OCC Workforce Relations and Performance Management, and Administrative and Internal Law representatives to discuss the use of ADR and to identify ways to promote ADR services.	Yes		09/30/2018
03/31/2017, 09/30/2017	Continue to conduct EEO briefings with Executive Committee members, and include information on ADR at the OCC.	Yes		09/30/2018
09/30/2017	Conduct periodic outreach briefing to National Treasury Employees Union officials on using ADR as a resource for resolving conflicts and a viable alternative to grievances or litigation.	Yes		09/30/2018
09/30/2018	Highlight ADR in a revised module in the FY 2018 mandatory No FEAR Act training.	Yes		09/30/2018
08/31/2018	Promote a Treasury-wide webinar highlighting Civility in the Workplace, in conjunction with OCC's Dispute Prevention Week Observance. Marketed the benefits of electing ADR in the EEO complaint process and raised awareness to maintaining a respectful workplace.	Yes		07/30/2018

## Report of Accomplishments

Fiscal Year	Accomplishments
FY 2018	In FY 2018, the OCC experienced a slight decrease in our ADR participation rate. This year's ADR participation rate was 41.7 percent (20 of 48), compared with 44.1 percent in FY 2017. Of the 48 total cases completed in FY 2018, 38 (79.2 percent) were eligible for ADR (20 participated and 18 declined). While we offer ADR to all who are eligible, 20.8 percent (10 out of 48) were ineligible for ADR based on the OCC's ADR policy (two external applicants, one anonymous complainant,

four terminations and three other non-employees). The OCC's policy provides that cases involving an anonymous complainant; non-selection of an external applicant for employment; termination, including termination during a probationary period, or other non-employees; criminal activity; and waste, fraud, or abuse, are ineligible for ADR. ADR is always offered to anyone eligible, making the eligible offer rate 100 percent. If the ineligible cases were excluded from the calculation, the participation rate in FY 2018 would have been 52.6 percent (20 of 38 eligible cases participated in ADR).

The OCC will continue its outreach to supervisors, staff, and union representatives to promote the benefits of electing ADR in the EEO pre-complaint process. Also, the OCC will continue successful past activities and monitor activities as they are implemented.

## MD-715 – Part H

### Agency EEO Plan to Attain the Essential Elements of a Model EEO Program

Please describe the status of each plan that the agency has implemented to correct deficiencies in the EEO program.

If the agency did not address any deficiencies during the reporting period, please check the box.

#### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Management and Program Accountability	<p>Less than 90.0 percent of reasonable accommodation (RA) requests are being processed within the time frame set forth in the agency procedures for RA—75.9 percent in FY 2016, below the 90.0 percent metric set forth in the MD-715 directive and guidance.</p> <p>There was a significant increase in pre-complaints involving RA requests, with a common theme/concern about the timeliness of the process. The EEO Office also fielded concerns that “excessive” medical documentation was being required for RA requests. Further, the EEO Office was informed that medical documentation was being required for some requests for a voluntary modification.</p>

#### Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2016	Ensure at least 90.0 percent of all RA requests are processed in a timely, efficient, and fair manner.	09/30/2018		09/30/2018

#### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Deputy Comptroller, Human Capital (HC)	Cassandra Cuffee-Graves	Yes
Director, Workforce Relations and Performance Management/Office of Human Capital	Eric Adams	Yes
Executive Director, Office of Minority and Women Inclusion	Joyce Cofield	Yes

## Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2017	The OCC's EEO Office will conduct a formal review of the agency's RA program and identify any areas of non-compliance and program deficiencies, if appropriate.	Yes		09/30/2017
09/30/2017	The OCC's HC Office will develop an action plan to address the deficiencies, if appropriate.	Yes		09/30/2017
10/30/2017	Publish a revised RA policies, and procedures manual (PPM) and conduct agency-wide training on the key changes. Key changes include: changing manager's time frame to report RA request to the National Accommodation Coordinator from five business days to three days, adopt EEOC RA decision template form, and define medical certificate versus medical documentation and state when each is required.	Yes		10/30/2017
10/30/2017	Conduct training at the Disability Awareness Month event.	Yes		10/30/2017
09/30/2018	Conduct training for managers on the RA program to the remaining lines of business: Chief Counsel's Office, Economics, Office of Management, Compliance and Community Affairs, Office of the Chief National Bank Examiner, Office of Enterprise Governance and the Ombudsman, Public Affairs Office, Midsize Bank Supervision.	Yes		09/30/2018

## Report of Accomplishments

Fiscal Year	Accomplishments
FY 2018	<p>In FY 2018, 97.2 percent of RA requests were processed within the time frame set forth in the agency procedures.</p> <p>The OCC has exceeded the 90 percent program metric in this essential element, as it did in FY 2017 (97.3 percent), and achieved its objectives and planned activities. Therefore, the OCC is closing out this plan.</p>

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## MD-715 – Part I Agency EEO Plan to Eliminate Identified Barrier

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

If the agency did not conduct barrier analysis during the reporting period, please check the box.

### Statement of Condition That Was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables  Workforce Data Tables Five-Year Trend Analysis	A1, A6, A8, & A14S2	<p>The representation of Hispanic bank examiners (females) and Hispanic employees (males) in non-major occupational groups in the OCC are lower than expected when compared with their participation in the occupational civilian labor force (OCLF) and national civilian labor force (NCLF).</p> <p>In FY 2018, Hispanic female bank examiners were represented in the OCC’s workforce at 3.2 percent, compared with the 2010 OCLF rate of 3.7 percent. Hispanic males in non-major occupational groups were represented in the workforce at 3.0 percent, compared with the 2010 NCLF rate of 5.2 percent.</p>

### EEO Group(s) Affected by Trigger

EEO Group	
All Men	
All Women	
<b>Hispanic or Latino Males</b>	<b>Yes</b>
<b>Hispanic or Latino Females</b>	<b>Yes</b>
White Males	
White Females	
Black or African American Males	
Black or African American Females	
Asian Males	
Asian Females	
Native Hawaiian or Other Pacific Islander Males	

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<b>EEO Group</b>
Native Hawaiian or Other Pacific Islander Females
American Indian or Alaska Native Males
American Indian or Alaska Native Females
Two or More Races Males
Two or More Races Females

**Barrier Analysis Process**

<b>Sources of Data</b>	<b>Source Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	Reviewed Tables A1, A6, A8, & A14S2 to track the participation pattern across demographics profiles of Hispanic bank examiners and Hispanic employees in non-major occupational groups to determine if there is growth in their participation rates.
Complaint Data (Trends)	Yes	Reviewed complaints trend data to determine if Hispanics raised common issues.
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	Reviewed the questions that support the diversity and inclusion index for Hispanics in the FEVS.
Exit Interview Data	Yes	Reviewed responses from Hispanics to determine common reasons for leaving the agency, and their work experiences.
Focus Groups	Yes	Reviewed Hispanic focus group data results on their work experiences and opinions concerning the low representation of Hispanic employment in the OCC.
Interviews	Yes	Reviewed interview data from various groups (e.g., HOLA, recruiters, interviewers/panelists, staffing specialists, hiring officials) regarding their experiences and opinions concerning the low representation of Hispanic employment in the OCC.
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Reviewed several federal and private sector reports, and special interest groups (e.g., GAO, EEOC, National Hispanic Leadership Agenda, Diversity Conference and

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<b>Sources of Data</b>	<b>Source Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
		Corporate Executive Board), to gain additional information on best practices and solutions for addressing low participation of Hispanics in the OCC's workforce.
Other (Please Describe)	Yes	<p>Monitored the number of Hispanic applicants for entry-level bank examiner positions, and their movement through the recruitment process.</p> <p>Compared the OCC's workforce data on Hispanic examiners with Hispanic students with conferred B.A. and M.A. business degrees to assess the diversity sufficiency of educational sourcing pools.</p> <p>Conducted a 10-year retention analysis of race and national origin groups.</p> <p>Prepared a Five-Year Trend Analysis of the Workforce Data Tables.</p>

**Status of Barrier Analysis Process**

<b>Barrier Analysis Process Completed? (Yes or No)</b>	<b>Barrier(s) Identified? (Yes or No)</b>
Yes	Yes

**Statement of Identified Barrier(s)**

<b>Description of Policy, Procedure, or Practice</b>
<p>The low workforce participation rate of Hispanics is largely influenced by low participation in the OCC's bank examiner (females) and non-major occupational groups (males). Our analysis indicates that Hispanic female bank examiners were hired at levels below the OCLF rates. Hispanic males in non-major occupational groups were also hired at levels below the NCLF rates; and separated at rates above their workforce participation rate.</p>

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**Objective(s) and Dates for EEO Plan**

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Increase the participation of Hispanic female bank examiners and Hispanic males in non-major occupational groups.	10/01/2004	09/30/2022	Yes	10/01/2017	
Improve the retention of Hispanic female bank examiners and Hispanic males in non-major occupational groups.	10/01/2004	09/30/2022	Yes	10/01/2017	

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
Senior Deputy Comptrollers	All Executive Committee Members	Yes
Executive Director, Office of Minority and Women Inclusion	Joyce Cofield	Yes

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/18	Implement recommendations that come out of the Enterprise Recruitment Plan that are applicable.		09/30/18
09/30/18	Continue to revise and expand the Hispanic Recruitment Strategy to recruit Hispanic female bank examiners and Hispanic males in non-major occupational groups.		09/30/18
09/30/18	Continue to further develop strong relationships		09/30/18

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<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
	with college campuses and with clubs and groups on campus that have Hispanic students, such as Beta Alpha Psi (BAP) and Association of Latino Professionals for America (ALPFA).		
09/30/18	Work with District Recruitment Specialists to ensure targeted programs for attracting Hispanic talent to the OCC.		09/30/18
09/30/18	Participate in the ALPFA national and regional conferences and meetings.	09/30/19	
09/30/18	Continue to analyze and use research data from National Association of Colleges and Employers (NACE) on accounting and finance graduating classes and the demographic make-up of the student bodies to help determine which schools the OCC will recruit from to build a qualified and diverse applicant pool of Hispanics.		09/30/18
09/30/18	Continue to explore ways to expand applicant pools for non-major occupational positions (Hispanic-populated job fairs, internships, Hispanic associations).		09/30/18
09/30/18	Recruit students using the financial internship program for MCBS and LBS.		09/30/18
09/30/18	Continue to support the work of HOLA's Human Capital (HC) Committee, designed to offer HOLA's input into the OCC's efforts to recruit, retain, and advance Hispanics in the workforce, and its Discipline Champion Cadre, which identifies champions from various specialty areas to serve as mentors to Hispanic employees.		09/30/18
09/30/18	Invite OCC speakers to HOLA annual and quarterly calls to discuss OCC career opportunities.		09/30/18
09/30/18	Continue to direct OCC job opportunities and postings to the HOLA membership.		09/30/18
09/30/18	Continue to promote Hispanic participation in management, leadership, and career development programs.		09/30/18

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<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
09/30/18	HOLA members will participate in OCC outreach at the annual conferences of Latin American organizations, including LULAC and UnidosUS, formerly La Raza.	09/30/19	
09/30/18	HOLA will participate in OCC employee network events and periodically host “meet and greet” brown-bag lunches to provide employees with an opportunity to learn more about HOLA and its members.		09/30/18
09/30/19	Establish a temporary focused full-time Special Emphasis Hispanic Program Manager role that will address the identified deficiencies by planning and implementing activities to improve hiring and employment practices and ensure full participation of Hispanics in the OCC’s workforce.		

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
FY 2018	<p>In FY 2018, the low participation rate of Hispanic employees remained a priority area for the OCC. Our Hispanic population increased slightly to 7.3 percent in FY 2018, a 0.3 percentage point increase from 7.0 percent in FY 2017, and a 2.2 percentage point improvement over the FY 2005 rate of 5.1 percent. Our overall participation rate, however, remains significantly below the 2010 NCLF rate of 10.0 percent. When compared with the relevant CLF (RCLF) rate (7.3 percent), Hispanic participation overall is at parity.</p> <p>The low participation rate of Hispanics in non-major occupational groups (7.6 percent vs. 10.0 percent NCLF rate) continued to be a major influence in the overall disparity of Hispanics in the agency. Hispanic males in these groups participated at 3.0 percent in the workforce, compared with 5.2 percent in the NCLF, a 0.2 percentage point increase from FY 2017. Hispanic females continued to exceed their NCLF rate.</p> <p>Since FY 2017, Hispanics’ participation in non-major occupational groups increased slightly from 7.5 percent to 7.6 percent in FY 2018. The hiring rate of Hispanics in these groups was below the NCLF rate (8.6 percent vs. 10.0 percent), but an increase above the FY 2017 rates (6.7 percent). The low parity in Hispanic hires was due to the low rate of female hires, compared with their NCLF rate (1.7 percent vs. 4.8 percent). Hispanic male hires in non-major occupational groups exceeded their NCLF rate (6.9 percent vs. 5.2 percent).</p>

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	<p>Separations were below the workforce participation rate (5.0 percent vs. 7.6 percent) for Hispanics in non-major occupational groups. Both Hispanic males and females separated below their workforce participation rate (males, 2.5 percent vs. 3.0 percent; and females, 2.5 percent vs. 4.6 percent).</p> <p>The OCC's overall low participation rate of Hispanics is also influenced by the disparity of Hispanic bank examiners. In FY 2018, Hispanic female bank examiners were participating below their OCLF rate (3.2 percent vs. 3.7 percent), while males participated at rates exceeding their OCLF rate (4.1 percent vs. 3.1 percent). Over the last fiscal year, the number of Hispanic bank examiners increased slightly (7.3 percent), by 0.3 percentage points.</p> <p>Hispanic bank examiners were hired at a rate greater than their OCLF rate (15.3 percent vs. 6.8 percent). Both Hispanic male and female bank examiners were hired above their OCLF rates (males, 10.2 percent vs. 3.1 percent; and females, 5.1 percent vs. 3.7 percent). Separations were below their workforce participation rate for Hispanic females (2.1 percent vs. 3.7 percent).</p> <p>The Entry-Level Bank Examiner Recruitment Program continued to be a significant source for Hispanic hiring at the OCC. In FY 2018, 15.8 percent (15) of entry-level bank examiners self-identified as Hispanics, above the 6.8 percent OCLF.</p> <p>The OCC conducted a separate applicant flow data analysis on job vacancies processed by the OCC and closed in FY 2018 during the first three quarters, by gender, ethnicity (Hispanic and non-Hispanics), and a combination of gender and ethnicity. The applicant pool rate for Hispanics who self-identified was 13.4 percent, above the NCLF of 10.0 percent. However, the selection rate of 8.4 percent was below the NCLF rate (10.0 percent). Preliminary results indicated a negative shift of Hispanic applicants as they progressed through the hiring decision process. The OCC acknowledges this is the second year with similar findings, and will work intentionally in FY 2019 to identify the cause and begin to develop an action plan.</p> <p>The OCC conducted an applicant flow data analysis of the entry-level bank examiner recruitment process for the Midsize and Community Bank Supervision (MCBS) and Large Bank Supervision (LBS) recruitment campaigns in 2018. The combined applicant pool rate for Hispanics who self-identified on average was 15.4 percent, with an external hiring rate of 15.5 percent; the applicant pool and hiring rate exceeded the Hispanic examiner OCLF rate of 6.8 percent.</p> <p>In FY 2018, the OCC also launched the Honors Attorney Program, designed to provide cross-training and developmental assignments to equip incoming attorneys (law clerks and attorneys) with legal skills and experiences across multiple legal practice areas. Eight employees were hired for the first class of 2018, of which six (75.0 percent) were law clerks (non-major occupational series). Of the six law clerks, four (66.7 percent) were Hispanics.</p>
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	<p>The OCC hired five students from the Pathways internship program; 20.0 percent (1) was Hispanic, above the NCLF rate of 10.0 percent.</p> <p>The OCC's retention strategies include the full engagement of its employees and encompass career development and advancement opportunities. Members of the OCC's Hispanic staff (8.0 percent) participated in several formal and informal career development programs and training courses that provided learning and continuous growth opportunities in FY 2018. The entry-level examiner recruitment program was also used to mentor and prepare examiners for the Uniform Commission Examination (UCE). Hispanics successfully passed the UCE (10.1 percent) at rates exceeding their participation in the bank examiner workforce (7.3 percent). Hispanic employees (11.8 percent) also participated in the OCC's newly launched Leadership Exploration and Development (LEAD) Program, designed to develop leadership competencies at the team leader and/or manager level and foster a broader, enterprise perspective.</p> <p>In addition, Hispanic employees (7.4 percent) participated in agency-sponsored leadership training courses designed for managers, supervisors, and employees. Hispanic executives (4.6 percent) also participated in the agency's executive coaching program, designed to address both immediate tactical issues and strategic long-term issues or opportunities, and to coach leaders to align vision, actions, and performance.</p>
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## MD-715 – Part I Agency EEO Plan to Eliminate Identified Barrier

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

If the agency did not conduct barrier analysis during the reporting period, please check the box.

### Statement of Condition That Was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables  Workforce Data Tables Five-Year Trend Analysis	A6, A8, & A14S2	The representation of female bank examiners in the OCC is lower than expected, when compared with their 2000 occupational civilian labor force (OCLF) rate.  In FY 2018, female bank examiners' participation in the workforce was 39.1 percent, below their 2010 OCLF rate (45.3 percent).

### EEO Group(s) Affected by Trigger

EEO Group	Yes
All Men	
<b>All Women</b>	<b>Yes</b>
Hispanic or Latino Males	
Hispanic or Latino Females	
White Males	
White Females	
Black or African American Males	
Black or African American Females	
Asian Males	
Asian Females	
Native Hawaiian or Other Pacific Islander Males	
Native Hawaiian or Other Pacific Islander Females	
American Indian or Alaska Native Males	

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<b>EEO Group</b>
American Indian or Alaska Native Females
Two or More Races Males
Two or More Races Females

**Barrier Analysis Process**

<b>Sources of Data</b>	<b>Source Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	Reviewed Tables A6, A8, & A14S2 to track the participation pattern across demographics profiles of female bank examiners to determine if there is growth in their participation rates.
Complaint Data (Trends)	Yes	Reviewed complaints trend data to determine if cases raised by female Bank Supervision employees raised common issues.
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	Reviewed the questions that support the diversity and inclusion index for females in the FEVS.
Exit Interview Data	Yes	Reviewed responses from female bank examiners to determine common reasons for leaving the agency, and their work experiences.
Focus Groups	Yes	Collected interview data from TWN members on their work experiences and opinions concerning the low representation of female bank examiner employment in the OCC.
Interviews	Yes	Reviewed interview data from various groups (e.g., TWN, recruiters, interviewers/panelists, staffing specialists, hiring officials, etc.) regarding their experiences and opinions concerning the low representation of female bank examiner employment in the OCC.
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Reviewed federal and private sector reports to gain additional information on best practices and solutions for addressing low participation of female bank examiners in the OCC's workforce.

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<b>Sources of Data</b>	<b>Source Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Other (Please Describe)	Yes	<p>Monitored the number of female applicants for entry-level bank examiner positions, and their movement through the recruitment process.</p> <p>Compared the entry-level test scores for females with other groups' test scores.</p> <p>Compared the OCC's workforce data on female bank examiners with female students with conferred B.A. and M.A. business degrees.</p> <p>Conducted a 10-year retention analysis of genders.</p> <p>Prepared a Five-Year Trend Analysis of the Workforce Data Tables.</p>

**Status of Barrier Analysis Process**

<b>Barrier Analysis Process Completed? (Yes or No)</b>	<b>Barrier(s) Identified? (Yes or No)</b>
Yes	Yes

**Statement of Identified Barrier(s)**

<b>Description of Policy, Procedure, or Practice</b>
<p>Our analysis indicates that entry-level female bank examiners were limited in the applicant pool and were hired at rates below the OCLF rate. The average separation rate and the average hiring rate were about the same.</p> <p>Further analysis indicated that feedback from prospective applicants revealed that private sector jobs are more attractive due to fewer travel requirements. This perspective is supported by exit survey results from departing OCC female examiners. These factors greatly contribute to the existence of this trigger, and to the speed with which the OCC can eliminate this barrier.</p>

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**Objective(s) and Dates for EEO Plan**

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Develop a recruitment and retention strategy for female bank examiners that builds on the success of our outreach and recruitment efforts.	10/01/2004	09/30/2022	Yes	10/01/2017	

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
Senior Deputy Comptroller for Large Bank Supervision (LBS)	Morris Morgan	Yes
Senior Deputy Comptroller for Midsize and Community Bank Supervision (MCBS)	Toney Bland	Yes
Senior Deputy Comptroller and Chief National Bank Examiner (CNBE)	Grace Dailey	Yes
Acting Senior Deputy Comptroller and Chief Counsel	Bao Nguyen	Yes
Executive Director, Office of Minority and Women Inclusion (OMWI)	Joyce Cofield	Yes

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/18	Implement recommendations that come out of the Enterprise Recruitment Plan that are applicable.		09/30/18
09/30/18	Enhance current recruitment sources to ensure applicant pools of qualified female candidates.		09/30/18

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<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
09/30/18	Expand the Entry-Level Bank Examiner Recruitment Program efforts and recruitment strategy and develop relationships with additional women's colleges.		09/30/18
09/30/18	Engage the expertise of district recruitment specialists to target and recruit diverse female bank examiner candidates.		09/30/18
09/30/18	Recruit students through the District and LBS Financial Internship Program.		09/30/18
09/30/18	Work on the recommendations from the evaluation report and make changes to the current assessment process for assistant bank examiners by working with the Office of Personnel Management (OPM) and an industrial psychologist.		09/30/18
09/30/18	Continue to promote diversity in recruiters and interview panels.		09/30/18
09/30/18	Participate in the Women's MBA Conference; Women in Wealth Management Conference; Black Accountants national and regional conferences; and the Community Reinvestment and Fair Lending Conference.		09/30/18
09/30/18	Recruit experienced specialty bank examiners from the following conferences, which have high female participation rates: Association of Certified Anti-Money Laundering Specialists (ACAMS), American Bankers Association/Bank Secrecy Act (ABA/BSA), Consumers Bankers Association (CBA), and Fiduciary and Investment Risk Management Association (FIRMA).		09/30/18
09/30/18	Revamp the recruitment video to emphasize the agency's interest in enhancing the diversity of its workforce.	09/30/19	
09/30/18	Further develop strong relationships with college campus groups such as BAP.		09/30/18
09/30/18	Analyze and use research data from NACE on accounting and finance graduating classes, their demographics, and ways to build a qualified and diverse applicant pool of females.		09/30/18

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<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
09/30/18	Support more internal mentoring circles to engage with female employees on how to balance the responsibilities of work and family.		09/30/18
09/30/18	Support TWN in providing OCC employees with access to networking and mentoring opportunities that will enhance their job satisfaction and prepare them for possible advancement.		09/30/18
09/30/18	Promote retention of women by establishing networking venues to which women can turn for support, encouragement, and mentorship when they encounter workplace challenges.		09/30/18
09/30/18	Continue regular reviews with senior management and ENGs to highlight areas of concern and opportunities for improvement.		09/30/18

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
FY 2018	<p>In FY 2018, the workforce participation rate of female bank examiners increased slightly to 39.1 percent from 38.9 percent in FY 2017, remaining above the 36.1 percent in FY 2005 but below the 2010 OCLF rate of 45.3 percent. Female bank examiners separated at a rate of 34.6 percent, below their workforce participation rate (39.1 percent) and their rate of separations in FY 2017 (35.1 percent). The hiring rate (34.7 percent) of female bank examiners was below their OCLF rate (45.3 percent) and their hiring rate in FY 2017 (37.1 percent). Hiring rates for female bank examiners in key bank supervision groups were, for MCBS, 44.6 percent entry-level (pre-commissioned) and 12.5 percent experienced-level; and for LBS, 20.0 percent experienced-level.</p> <p>In addition, the OCC hired 95 entry-level bank examiners, of which 43.2 percent (41) were females, above the FY 2017 hiring rate (40.6 percent).</p> <p>The OCC conducted an applicant flow data analysis of the entry-level bank examiner recruitment process for MCBS and LBS recruitment campaigns in 2018. The applicant pool rate for females who self-identified in the combined campaign pools on average was 35.2 percent with a hiring rate of 39.3 percent; the applicant pool and hiring rate were below the female bank examiner OCLF rate of 45.3 percent.</p> <p>The OCC also conducted a separate applicant flow analysis on examiner vacancies closed during the first three quarters of FY 2018 (including entry-</p>

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	<p>level bank examiners) by gender. The applicant pool rate for females who self-identified was 38.3 percent and the selection rate was 40.2 percent; both were below the OCLF rate of 45.3 percent. There was no evidence of a statistically significant shift in the gender composition of the applicant pool as they reached the selection process.</p> <p>Female bank examiners were promoted at a higher rate (41.0 percent) than their participation in the workforce (39.1 percent). During FY 2018, three Uniform Commission Examination (UCE) testing sessions were held. Of the 69 bank examiners who successfully passed the UCE, 46.4 percent (32) were females: above their average availability pool rate (38.9 percent), and an improvement over the FY 2017 rate (26.6 percent).</p> <p>The OCC continued to hire financial interns in its district offices. In FY 2018, the districts hired five financial interns, of whom 20.0 percent (1) was female.</p> <p>The OCC sponsored focus group sessions with entry-level bank examiners to capture their on-boarding and first-year experiences on the job. In FY 2018, 10 surveys and focus group sessions were conducted.</p> <p>In FY 2017, TWN conducted an analysis of OCC survey responses by OCC females to identify key factors influencing female career decisions, including retention decisions. TWN analyzed and compared data from the agency's engagement survey, FEVS, and exit surveys. In FY 2018, the focus group results were shared with the Committee on Bank Supervision (CBS) leadership, OMWI, and Leadership Development.</p> <p>TWN promoted its highly successful mentoring circles as a continued vehicle to support mentoring for women, enabling opportunities for collaboration, networking, and goal achievement. Six mentoring circles were offered in FY 2018 to help employees successfully address career issues. Mentoring circle topics include "Career Exploration I," "Career Exploration II," "Work/Life Balance," "Uniform Commission Examination Preparation," "Leadership I," and "Leadership II." A total of 16 mentors, 40 mentees, and 6 mentoring committee members participated in the circles: 82.4 percent (56) were female, 26.5 percent were Black, 13.2 percent were Asian, 7.4 percent were Hispanic, and 2.9 percent were Small ERI groups. The participation rate for all groups, except females, was greater or nearly the same as in FY 2017.</p>
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## MD-715 – Part I Agency EEO Plan to Eliminate Identified Barrier

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

If the agency did not conduct barrier analysis during the reporting period, please check the box.

### Statement of Condition That Was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables  SLP Trend Analysis	A4 & A8S-3	<p>The participation rates of female and minority employees in the OCC are below their workforce participation rates at the GS-13 equivalent and above grade levels.</p> <p>In FY 2018, females overall, White females, Blacks, Hispanics, and Asians in senior-level position (SLP) were participating below their workforce participation rates (while Small ERI groups were absent from SLP): females (32.1 percent vs. 45.1 percent) and minorities (25.0 percent vs. 35.1 percent).</p>

### EEO Group(s) Affected by Trigger

EEO Group	
All Men	
All Women	
<b>Hispanic or Latino Males</b>	<b>Yes</b>
<b>Hispanic or Latino Females</b>	<b>Yes</b>
White Males	
<b>White Females</b>	<b>Yes</b>
<b>Black or African American Males</b>	<b>Yes</b>
<b>Black or African American Females</b>	<b>Yes</b>
<b>Asian Males</b>	<b>Yes</b>
<b>Asian Females</b>	<b>Yes</b>
<b>Native Hawaiian or Other Pacific Islander Males</b>	<b>Yes</b>

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<b>EEO Group</b>	
<b>Native Hawaiian or Other Pacific Islander Females</b>	<b>Yes</b>
<b>American Indian or Alaska Native Males</b>	<b>Yes</b>
<b>American Indian or Alaska Native Females</b>	<b>Yes</b>
<b>Two or More Races Males</b>	<b>Yes</b>
<b>Two or More Races Females</b>	<b>Yes</b>

**Barrier Analysis Process**

<b>Sources of Data</b>	<b>Source Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	Reviewed Tables A4 and A8S-3 to track the participation pattern across demographics profiles of female and minority employees to determine if there is growth in their participation rates.
Complaint Data (Trends)	Yes	Reviewed complaints data on selections to determine if there are any trends in cases raised by female and minority employees.
Grievance Data (Trends)	Yes	Reviewed grievance data on selections to determine any trends in cases raised by female and minority employees.
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	Reviewed and considered the findings and recommendations of the external reviews, evaluations, and audits performed by the Office of Inspector General (OIG), Equal Employment Opportunity Commission (EEOC), Office of Personnel Management (OPM), and Treasury Department on the OCC's workforce, and specifically its SLP and feeder groups.
Climate Assessment Survey (e.g., FEVS)	Yes	Reviewed the questions and responses that support the diversity and inclusion index for females and minority employees in the FEVS.
Exit Interview Data	Yes	Reviewed responses from females and minority employees to determine common reasons for leaving the agency, and their work experiences.
Focus Groups	Yes	Formed a working group that conducted a root causes analysis and held brainstorming sessions to identify potential barriers analysis and solutions, researched best practices with industry leaders, developed recommendations for solution with an implementation

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<b>Sources of Data</b>	<b>Source Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
		framework.
Interviews	Yes	Reviewed interview data from various groups (e.g., TWN and other ENGs, recruiters, interviewers/panelists, staffing specialists, hiring officials) regarding their experiences and opinions concerning the low representation of female and minority employment in the OCC.
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Reviewed several federal, private sector, and special interest group reports (i.e., EEOC, GAO, Catalyst, Corporate Executive Board, and the McKinsey Group) to gain additional information on best practices and solutions for addressing low participation of female bank examiners in the OCC's workforce.
Other (Please Describe)	Yes	Conducted a career aspirations assessment survey in 2014, of employees in pay bands NB-VI and NB-VII.  Analyzed other variables that could provide insight into the differences between males and females overall, for example, age, base salary, relocation, and travel.

**Status of Barrier Analysis Process**

<b>Barrier Analysis Process Completed? (Yes or No)</b>	<b>Barrier(s) Identified? (Yes or No)</b>
Yes	Yes

**Statement of Identified Barrier(s)**

<b>Description of Policy, Procedure, or Practice</b>
Through the work of the interdisciplinary Working Group, the OCC identified three main causes for the disparity in representation of women and minorities in SLP and their pipelines: leadership skill barriers, cultural barriers, and career aspirations. The leadership skill barrier includes issues of office morale, encouragement, and the role of leaders. The cultural barrier involves a clear recognition of the value of diversity in the organization. The career aspirations barrier includes travel requirements, job stress, geographic relocations and family obligations, and work/life balance.

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**Objective(s) and Dates for EEO Plan**

<b>Objective</b>	<b>Date Initiated (mm/dd/yyyy)</b>	<b>Target Date (mm/dd/yyyy)</b>	<b>Sufficient Funding &amp; Staffing? (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Date Completed (mm/dd/yyyy)</b>
Increase the participation of females and minorities in supervisor positions and SLPs by eliminating the barriers in leadership skills, cultural, and career aspirations.	10/01/2009	09/30/2022	Yes	10/01/2017	

**Responsible Official(s)**

<b>Title</b>	<b>Name</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>
Senior Deputy Comptrollers	All Executive Committee Members	Yes
Executive Director, Office of Minority and Women Inclusion (OMWI)	Joyce Cofield	Yes

**Planned Activities Toward Completion of Objective**

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
09/30/18	Partner with key stakeholders throughout the agency to execute the Enterprise Workforce Plan and its various components, and track and monitor the agency's progress in implementing the SLP Plan.		09/30/18
09/30/18	Establish an enterprise-wide leadership program for aspiring managers and executives, to include launching a Leadership Exploration and Development Program, an Executive Development Program, and an Executive Women group training.		09/30/18
09/30/18	Conduct a Succession Planning Program Review.		09/30/18

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## Report of Accomplishments

Fiscal Year	Accomplishments
FY 2018	<p>The low participation of females and minorities in supervisor roles and SLP remained a challenge during FY 2018. Females participated at 45.1 percent in the workforce and held 39.5 percent of supervisor positions and 32.1 percent of SLP; both rates remained below their workforce participation rate. Female participation rates increased in supervisor roles (1.2 percentage points) and SLP (1.1 percentage points) between FY 2017 and FY 2018.</p> <p>Like females, minorities also participated in supervisor roles and SLP below their overall workforce participation rates and increased their participation in FY 2018. Minorities participated at 35.1 percent in the workforce and held 26.2 percent of supervisor positions and 25.0 percent of SLP. Minority participation rates increased in supervisor roles (1.0 percentage points) and SLP (4.3 percentage points). Black males and females, Hispanic males and females, and Asian males increased in SLP, although they remain below their workforce participation rates, with the exception of Asian males. Asian males are above parity in SLP. In supervisor roles, participation rates of all minority groups increased in FY 2018.</p> <p>In addition, females (44.0 percent) and minorities (31.2 percent) in the SLP participated in the Executive Coaching Program that is designed to address both immediate tactical issues and strategic long-term issues or opportunities, and to coach leaders to align vision, actions, and performance.</p> <p>Also, females (40.6 percent) and minorities (21.7 percent) in the SLP feeder grade (GS-15 equivalent) participated in several formal career development programs and training courses that provided learning and continuous growth opportunities in FY 2018. Participation rates increased from FY 2017 for females and minorities by 0.7 percentage points and 1.9 percentage points, respectively.</p>

## MD-715 – Part I Agency EEO Plan to Eliminate Identified Barrier

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

If the agency did not conduct barrier analysis during the reporting period, please check the box.

### Statement of Condition That Was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables	A4, A6, & A8S	Low representation of Hispanic workforce participation in GS-13 through senior executive service (SES) equivalent positions (NB-V through NB-IX).

### EEO Group(s) Affected by Trigger

EEO Group	Yes
All Men	
All Women	
<b>Hispanic or Latino Males</b>	<b>Yes</b>
<b>Hispanic or Latino Females</b>	<b>Yes</b>
White Males	
White Females	
Black or African American Males	
Black or African American Females	
Asian Males	
Asian Females	
Native Hawaiian or Other Pacific Islander Males	
Native Hawaiian or Other Pacific Islander Females	
American Indian or Alaska Native Males	
American Indian or Alaska Native Females	

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<b>EEO Group</b>
Two or More Races Males
Two or More Races Females

**Barrier Analysis Process**

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Reviewed Tables A4, A6, & A8S to track the participation pattern across demographics profiles of Hispanic employees in GS-13 through SES equivalent positions to determine if there is growth in their participation rates.
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	Reviewed the questions and responses that support the diversity and inclusion index for Hispanics in the FEVS.
Exit Interview Data	Yes	Reviewed responses from Hispanics to determine common reasons for leaving the agency, and their work experiences.
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	Yes	Reviewed Hispanics' rate of participation in career development programs compared with their relevant workforce participation rates.

**Status of Barrier Analysis Process**

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No	No

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### Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
<p>In compliance with the requirement set forth in the Equal Employment Opportunity Commission (EEOC) and Office of Personnel Management's (OPM) memorandum, the OCC is required to conduct a barrier analysis of the OCC's Hispanic workforce participation of GS-13 through SES equivalent positions, for FY 2013 through FY 2017. Accordingly, the following triggers are present in OCC's workforce:</p> <p>As of July 22, 2017, Hispanic participation in GS-13 through SES (NB-V through NB-IX) equivalent positions, grade ranges, are as follows: GS-13/14 levels, 6.0 percent (150); GS-15 level, 4.4 percent (14); and SES level, 3.5 percent (2); all below the participation rate of Hispanics in the workforce (7.0 percent).</p>

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**Objective(s) and Dates for EEO Plan**

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Complete the Hispanic barriers analysis, and establish an action plan to address any areas of concern.	10/01/2017	09/30/2022	Yes		

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
Senior Deputy Comptrollers	All Executive Committee Members	Yes
Executive Director, Office of Minority and Women Inclusion (OMWI)	Joyce Cofield	Yes

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/18	Begin the next phase of its barrier analysis, continuing to use the criteria in OPM and EEOC's memorandum. OMWI will establish a working group to implement the next phase of the barrier analysis.	09/30/2019	

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY 2018	In FY 2018, OMWI continued to complete additional aspects of its Hispanic Barrier Analysis Study of the OCC's Hispanic workforce participation rate in GS-13 through SES equivalent positions.  In accordance with the criteria set forth in OPM and EEOC's memorandum, the OCC conducted a separate applicant flow data analysis on job

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	<p>vacancies processed by the OCC and closed in FY 2018 during the first three quarters, by ethnicity (Hispanics and non-Hispanics) and in grades GS-13 through SES equivalent positions (NB-V through NB-IX). The applicant pool rate for Hispanics who self-identified was 12.5 percent, above the NCLF rate of 10.0 percent and the RCLF rate of 7.3 percent. However, the selection rate of 5.3 percent for Hispanics was below the NCLF (10.0 percent) and the RCLF rate (7.3 percent). In FY 2018, there were a total of three Hispanics hired in pay bands GS-13 through SES equivalent positions (NB-V through NB-IX). Preliminary results indicated a negative shift of Hispanic applicants as they progressed through the hiring decision process. The number of OCC's overall hires declined between FY 2017 and FY 2018 by a net change of 31.8 percent, and a net change of 13.0 percent for Hispanics. The significant decline was due to revisions in the OCC's staffing priorities, resulting in fewer external hires in FY 2018. The OCC has increased its focus on the development and retention of the current workforce and will also conduct further analyses to better understand the impact on Hispanic applicants in FY 2019.</p> <p>In addition, the OCC examined its workforce data and performed a five-year trend analysis on the following components: career development programs, FEVS results, and employee exit survey results.</p> <p><i>Career Development Programs –</i></p> <p>The OCC examined Hispanic participation in career development programs and compared it to the group's relevant workforce participation rates during FY 2013 through FY 2018. Hispanics participated in all specialty career development programs below their relevant workforce participation rates. However, in career development courses/opportunities (technical training), Hispanics generally exceeded their workforce participation rates.</p> <p><i>FEVS –</i></p> <p>The OCC analyzed FEVS data results for Hispanics or Latinos by New IQ (diversity and inclusion) index scores, the Employee Engagement, and the Global Satisfaction Index scores between 2013 and 2017.</p> <p>The New IQ index score for Hispanics/Latinos and OCC was generally similar from 2013 to 2017. The 2017 overall New IQ index score and four of the five individual sub-factor (<i>Open, Cooperative, Supportive, and Empowered</i>) scores were all at or above the "Good" ranking of 65 percent as defined by OPM.</p> <p>The Hispanic/Latino New IQ sub-factor <i>Open</i> score (71 percent) declined by 11 percentage points over the five-year period, in response to the statement, "Supervisors work well with employees of different backgrounds." However, in the same sub-factor index Hispanic/Latino scores increased by eight percentage points over the same period of time for the statement, "My supervisor is committed to a workforce representative of all segments of society." This may suggest Hispanics/Latinos' perspective that OCC is good at hiring a diverse population of employees, but not as proficient in managing them.</p> <p>In the 2017 FEVS survey, the <i>Fair</i> New IQ sub-factor, all statement scores</p>
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	<p>were very similar between Hispanic/Latino and OCC respondents; and most were similar in the <i>Open IQ</i> sub-factor.</p> <p>Also, in the 2017 FEVS survey, for the Employee Engagement Index (EEI) sub-factor <i>Intrinsic Work Experience</i>, the score for the statement, “My work gives me a feeling of personal accomplishment” for Hispanics/Latinos (83 percent) is five percentage points higher than the OCC (78 percent).</p> <p>The five-year trend of scores for Hispanics/Latinos in the <i>Supportive IQ</i> sub-factor remained constant (84 percent) and generally consistent with the OCC’s score. Scores for Hispanics/Latinos in the Global Satisfaction Index were near those for the OCC (78 percent and 75 percent). Also, EEI trend scores in the sub-factor <i>Intrinsic Work Experience</i> for Hispanics/Latinos remained constant (76 percent). Scores in each of these indexes were above the “Good” overall ranking of 65 percent.</p> <p><i>Exit Survey Results -</i></p> <p>The OCC reviewed employee exit survey results for Hispanics for FY 2013 through FY 2017. The exit survey asks separating employees who voluntarily separated from OCC about their work experience, and the extent to which various employment factors may have affected their decisions to leave the OCC.</p> <p>Generally, the highest-ranking factors for Hispanic respondents who separated from the OCC in the last five fiscal years were job stress and office morale. Office morale increased by 20 percentage points in FY 2017 by Hispanic respondents, while job stress generally remained steady over the five-year period (50.0 percent). These two survey factors were also among the highest-ranked factors in the OCC in the last five years.</p> <p>For more information on the five-year trend, see the attached report entitled “MD-715 Barrier Analysis: Hispanics in Higher Grades and Senior-Level Positions Fiscal Year 2013 – FY 2018.”</p>
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