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U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS 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 th Street, SW	Washington	DC	20219	TR AJ	11001

Part B - Total Employment

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	3622	7	3629

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	Rebecca Tudisco	EEO Officer	0260	NB-06	202-649-6893	Rebecca.Tudisco@occ.treas.gov

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EEO Program Staff	Name	Title	Occup. Series (xxxx)	Pay Plan and Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
Program Manager						
Diversity & Inclusion Officer	Betty Washington	Diversity & Inclusion Program Manager	0301	NB-06	713-336-4323	Betty.Washington@occ.treas.gov
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)	Sarah Williams	Women Network President/NBE Core Policy Analyst	0570	NB-06	202-649-8134	Sarah.Williams@occ.treas.gov
Disability Program Manager (SEPM)	Valerie Tucker	Disability Program Co-Liaisons/Program Analyst	343	NB-05	202-649-6460	Valerie.Tucker@occ.treas.gov
	Doreen Rizopoulos	Disability Program Co-Liaisons/ Supervisory Human Resources Specialist	0201	NB-06	202-649-6661	Doreen.Rizopoulos@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	Sam.Reddy@occ.treas.gov
	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	Kelly.Gauvin@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

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EEO Program Staff	Name	Title	Occup. Series (xxxx)	Pay Plan and Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
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						

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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)	Yes	

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Did the agency submit the following optional documents?	Please respond Yes or No	Comments
Report		
Disabled Veterans Affirmative Action Program (DVAAP) Report	Yes	
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	Yes	
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 complete 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, 2019, the OCC had 3,629 employees (3,622 permanent and 7 temporary). This

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number reflects a decline of 5.6 percent below the 3,843 employees (3,823 permanent and 20 temporary) in FY 2018. Generally, all major demographic groups experienced an increase in their percentages of the workforce. When reviewing the OCC's workforce demographics, benchmark comparisons are made against the 2010 national civilian labor force (NCLF)¹ availability rates and the occupational civilian labor force (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 annual occupational composition and total workforce. The 2019 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, 2019.

Part E.4 - Executive Summary: Accomplishments

In May and June of 2019, OCC employees participated in the Federal Employee Viewpoint Survey (FEVS) administered by the U.S. Office of Personnel Management (OPM) and designed to measure employees' perceptions of workplace conditions conducive to fostering employee engagement. FEVS topics include direct supervision, work unit, leadership, agency, diversity, performance management, recognition, pay, work-life balance, and training and development. The 2019 FEVS invited all permanent OCC employees on-board as of October 27, 2018, to participate. Of the 3,602 OCC employees invited, 2,876 completed the survey, representing a 79.8 percent response rate, an increase of 2.6 percent from 2018. 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 Supervisors Subindex (84.2 percent) and Intrinsic Work Experience Subindex (73.2 percent). The OCC's Employee Engagement Index and Global Satisfaction Index scores (72.1 percent and 69.3 percent, respectively) exceeded those of the Treasury Department (69.5 percent and 64.4 percent, respectively) and the federal government (68.5 percent and 64.9 percent, respectively). The FEVS results also include a diversity and inclusion index (New IQ) that considers responses to questions addressing fairness, openness, cooperation, support, and empowerment. The OCC's New IQ index score declined slightly in 2019 to 68.3 percent (from 69.4 percent in 2018), higher than Treasury (62.9 percent) and the federal government overall (62.1 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 2019 data, the OCC ranked 103 of 420 agency subcomponents. Our 2019 ranking places us in the top 25 percent in our category, as compared with the top 13 percent in the 2018 rankings (53 of 415). In other categories measured by the Partnership, the OCC ranked 54 in effective leadership-supervisors and 74 in support for diversity.

For the third consecutive year, *Training* magazine rated the OCC among the "Training Top 125" organizations in the nation for 2018, our most recent submission for the recognition. The OCC earned the award for its design and development efforts throughout the Human Capital, Leadership and Career Development program areas. The magazine recognized the OCC's encouragement of mentoring relationships through structured mentoring circles, Discipline Champions Cadres, flash mentoring, and informal one-on-one mentoring carried out through its employee network groups. Training magazine also notes the OCC's "Career Power" course, through which approximately 100 employees participate in flash

¹ 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.

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mentoring and meet with mentors for three 20-minute sessions. As a result of mentoring efforts, 91 percent of mentoring participants experienced increased engagement, and 82 percent increased their learning and knowledge.

OCC 2019 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 2018 report:

1. Increasing the use of alternative dispute resolution (ADR) during the equal employment opportunity (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 senior-level positions (SLP).
5. Increasing the participation of individuals with disabilities.

1) Increasing the Use of EEO-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 EEO-ADR services to all eligible participants. In FY 2019, the OCC's EEO-ADR participation rate was 32.1 percent, a decrease from 41.7 percent in FY 2018. Of the 28 cases completed in FY 2019, 20 (74.1 percent) were eligible for EEO-ADR (9 participated and 11 declined) and 28.8 percent (8 cases of 28) were ineligible for EEO-ADR based on the OCC's ADR policy (two anonymous, three external applicants, one employment termination, and two 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 trial/probationary period, or other non-employees; criminal activity; and waste, fraud, or abuse, are ineligible for EEO-ADR. Of the 20 eligible cases in FY 2019, 9, or 45.0 percent, participated in EEO-ADR, compared with 52.6 percent in FY 2018 (of 38 eligible cases, 20 or 52.6 percent participated in EEO-ADR). Most of those individuals who were eligible for EEO-ADR and declined to participate expressed skepticism that EEO-ADR would be effective. Despite the decrease in the EEO-ADR participation rate, the resolution rate in FY 2019 was 50.0 percent; one in two completed pre-complaints did not become formal EEO complaints.

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 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 Brown Bag Session titled "What's ADR's Crucial Role in Addressing Harassment in the Workplace?" The Brown Bag emphasized the benefits of ADR.

Employees were also provided daily tips regarding ADR through the agency's electronic bulletin boards and announcements in "What's New at the OCC," a weekly newsletter emailed to all employees and available on the agency's intranet site. Actions to improve the EEO-ADR participation rate are described in Part H.

2) 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 2019, the Hispanic participation rate increased to 7.4 percent from 7.3 percent in FY 2018, an improvement from 5.1 percent in the OCC's FY 2005 baseline year. The OCC's Hispanic workforce participation rate

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(7.4 percent) remains below the NCLF rate of 10.0 percent, but at parity with the RCLF rate of 7.2 percent.

The low workforce participation rate of Hispanics is largely influenced by low participation in the OCC's non-major occupational groups (7.5 percent vs. 10.0 percent NCLF rate), specifically by Hispanic males. Hispanic males in non-major occupational groups participated at 2.9 percent in the workforce, below the 5.2 percent NCLF. Hires of Hispanic females in non-major occupational groups exceeded their NCLF (12.0 percent vs. 4.8 percent). Separations of Hispanic males were below their workforce participation rate (2.3 percent vs. 2.9 percent).

In addition, the OCC's overall low participation rate of Hispanics is influenced by corresponding participating rate of Hispanic bank examiners, specifically Hispanic females. The workforce participation rate of Hispanic female bank examiners remained stable at 3.2 percent in FY 2019, and below the OCLF rate of 3.7 percent. In FY 2019, Hispanic female bank examiners separated slightly below their workforce participation rate (3.1 percent vs. 3.2 percent).

The applicant flow analysis conducted on the entry-level bank examiner recruitment campaign in 2019 (Fall 2018) reflected no evidence of a 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 closed during the first three quarters of FY 2019, to include entry-level examiners hires. There was no evidence of a statistically significant shift in the ethnic composition of the applicant pool as they progressed through the various stages of the decision process.

The OCC continued to benefit from the activities of its Hispanic employee network group (ENG), the Hispanic Organization for Leadership and Advancement (HOLA). In FY 2019, HOLA launched two new initiatives—"Speak to Lead," which provides HOLA members with real-time feedback on mock exit or board meetings presentations, and "Career Coaching," in which members are paired with career coaches and provided advice on available career paths, career progression, résumés, interviews, and training. 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 also partnered with the agency's Office of Minority and Women Inclusion (OMWI) on the Hispanic barrier analysis project and made presentations to several business units to bring awareness to HOLA's mission, goals, and activities. HOLA members represented the agency at various career forums, job 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 2020. Actions to increase the participation of Hispanics in the agency are described in Part I.

3) Increasing the Participation of Female Bank Examiners

The OCC's population of female bank examiners decreased in FY 2019 to 38.4 percent from 39.1 percent in FY 2018 and remains below the OCLF rate of 45.3 percent. The 31.8 percent hiring rate of female bank examiners was below the OCLF rate (45.3 percent). The OCC's applicant flow data analysis of the 2019 entry-level recruitment campaign (Fall 2018) showed females represented 37.7 percent of the applicant pool and 35.3 percent of selection, both 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 2019, to include entry-level examiner selection. The analysis showed females made up 37.4 percent of the applicant pool and 44.3 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 pools as they reached the selection process.

During FY 2019, female bank examiners separated at a rate (43.8 percent) above their workforce participation rate (38.4 percent), their hiring rate (31.8 percent), and their rate of separation in FY 2018

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(34.6 percent).

Of separating female bank examiners in FY 2019, retirements accounted for 51.8 percent (an increase of 2.6 percentage points from FY 2018); resignations and transfers accounted represented 45.9 percent; and removals/terminations comprised 2.4 percent. Of the resignations, 51.3 percent were new hires (six or fewer years of employment) and 48.7 percent were mid-career employees (not new hires and not eligible for retirement).

In FY 2019, the retirement eligibility pool (currently eligible and expected to obtain eligibility within five years) for female bank examiners was 31.2 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, travel requirements, and office morale were the reasons most often cited by separating female bank examiners in the FY 2019 exit surveys, which are comparable with agency-wide survey results. 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: 85.6 percent flex, 68.6 percent vary their work schedules, and 89.6 percent telework, with 57.8 percent of employees teleworking either on a recurring or situational basis at least once a month during the year.

OMWI continued to work collaboratively with Bank Supervision management to identify barriers that could impede the realization of diversity goals specifically affecting 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 during their first year, and perceptions of OCC examiner culture. In FY 2019, the collection of new examiner feedback from Midsize and Community Bank Supervision (MCBS) training team members continued at their 6- and 12-month stages of OCC employment. Information sessions are facilitated and information collected by the OCC's Organizational Development (OD) unit and the resultant feedback is shared with MCBS senior management and the Examinations/Examiner Development group. OD consultants used surveys and virtual focus groups to gather feedback and prepare summaries for each hiring round, which include highlights of the main findings, e.g., entry-level bank examiners appreciate the continuous focus on growth and development. In FY 2019, nine surveys/focus group sessions were conducted. The feedback gathered is used by MCBS to improve its training team and new examiner development processes, i.e., real-exam work.

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 2019, MCBS sponsored a career forum for approximately 75 NB-IV pre-commissioned examiners from the Class of 2015. The forum enabled participants 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 2019, three UCE testing sessions were held. Forty-eight bank examiners successfully passed, of whom 37.5 percent (18) were females, down from 46.4 percent in FY 2018. In addition, 8.3 percent (4) were Hispanics, 8.3 percent (4) were Blacks, and 2.1 percent (1) were Asian; 4.2 percent (2) were individuals with disabilities. All of these groups, except Blacks, passed the UCE in

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FY 2019 at rates less than in FY 2018.

In FY 2019, the OCC's MCBS department also sponsored a half-day career forum for bank examiners who are in pay band NB-V, having passed the UCE and received their commission in 2019. The main focus of the forum was to provide these newly commissioned 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 Large Bank Supervision (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 2019, no new participants were added to the EXCEL I Program. New participants will be added in FY 2020.

The OCC has long benefited from the value provided by The Women's Network (TWN). In FY 2019, TWN supported the focused retention of female bank examiners through its mentoring circles that included topics such as "Career Exploration," "Work/Life Balance," "Uniform Commission Examination Preparation," and "Leadership." TWN also hosted two national teleconferences (on advocacy and postpartum depression), published three newsletters, and launched its Resource Groups Mentoring Program with two resource groups—"Managing Your Career" and "Work Life Navigation," which includes informational SharePoint site visits, teleconferences, and cadre chats.

The OCC will continue its focus in this area in FY 2020. Actions to increase the participation of female bank examiners in the agency are described in Part I.

4) Participation of Females and Minorities in Supervisor Roles and SLP

In FY 2019, females participated at 44.3 percent in the OCC workforce and held 38.0 percent of supervisor positions and 30.2 percent of SLP, down from FY 2018 participation rates by 1.5 percentage points and 1.9 percentage points, respectively. Minorities participated in the workforce at 35.6 percent and held 27.0 percent of supervisor positions and 28.3 percent of SLP, up from FY 2018 participation rates by 0.8 percentage points and 3.3 percentage points, respectively.

The OCC created the Executive Development Roadmap for employees who are interested in becoming an OCC executive and may benefit from some navigational assistance. The Roadmap is targeted to pay band NB-VI and NB-VII employees. It is intended to be another tool in the leadership journey toolbox that provides tips, resources, and best practices to support aspiring executives as they prepare to seek executive opportunities.

In FY 2019, five employees participated in the Federal Executive Institute Residential Development Program, an external executive development course—60.0 percent (3) were females and 40.0 percent (2) were minorities; and 100.0 percent (5) were supervisors and 40.0 percent (2) were in SLP.

The Treasury Executive Institute provides programs on a variety of leadership competencies (communication, conflict, diversity etc.) that can help support continuous learning and development. The OCC extended these learning opportunities to employees in pay bands NB-V and above. In FY 2019, 23 employees participated—60.9 percent (14) were females and 26.1 percent (6) were minorities; 30.4 (7) percent were supervisors/team leaders and 17.4 percent (4) were in SLP feeder grade GS-15 equivalent.

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.

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In FY 2019, the OCC conducted a pilot Succession Planning Program review to begin integrating competencies into the succession management structure through the talent management process.

The OCC will continue its focus in this area in FY 2020. Actions to address the disparity of minorities and females in supervisor positions and SLP are described in Part I.

5) Increasing the Participation of Individuals with Disabilities

In FY 2019, the workforce participation rate of individuals with disabilities increased to 9.1 percent from 8.8 percent in FY 2018 but remained below the EEOC's goal of 12.0 percent. Individuals with disabilities separated (12.4 percent) in FY 2019 at rates above their participation in the workforce (9.1 percent) and above their hiring rate (8.7 percent).

An applicant flow analysis was conducted on job vacancies closed during the first three quarters of FY 2019 for individuals with disabilities, to include entry-level examiner selections. There was a statistically significant shift in the composition of individuals with disabilities as they progressed through the various stages of the decision process. To further study the hiring process, the OCC examined the applicant flow data of the entry-level bank examiner recruitment campaign in 2019 (Fall 2018) for individuals with disabilities. Applicant flow recruitment (2.1 percent) resulted in a 3.6 percent external hiring rate for individuals with disabilities.

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. In FY 2019, MCO employees represented 80.2 percent of the agency's workforce collectively. Individuals with disabilities in MCO (6.8 percent) participated below the EEOC goal of 12.0 percent in FY 2019.

In FY 2019, individuals with disabilities in MCO were hired (1.1 percent) below the EEOC goal of 12.0 percent (all hires were bank examiners); and their separation rate (13.8 percent) was above their workforce participation rate (6.8 percent).

The OCC's cross-functional Disability Working Group continued to manage the framework for the Disability Program and the forming of a Disabilities ENG. This includes input into the agency's Disability Barrier Plan and its Affirmative Action Plan for Persons with Disabilities, described in Part J of this report. In FY 2019, the Working Group partnered with key stakeholders to execute the action plan.

In addition to the agency's efforts to hire individuals with disabilities, the OCC continued to enhance its 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) remediating two legacy courses to ensure 508 compliance, (2) developing, testing, and implementing 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) implementing 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."

Additional Noteworthy 2019 Accomplishments

The OCC accomplished the following:

- Created a temporary Diversity and Inclusion Program Manager (D&I PM) position to function within

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OMWI and partner with HOLA to continue the Hispanic barrier analysis study. The study included workforce analysis, focus groups, interviews, and research. Benchmarking and action plan development will continue in FY 2020. Details of the study are included in Part I.

- Piloted a training course on unconscious bias titled “Unconscious Bias: From Insight to Action,” in which 42 employees participated (two sessions). Of these employees, 52.4 percent (22) were females; 85.7 percent (36) were supervisors/team leaders; 23.8 percent (10) were Blacks, 11.9 percent (5) were Hispanics; 2.3 percent (1) were Asian; and 11.9 percent (5) were individuals with disabilities.
- Expanded its Career Development Center to provide career coaching, learning events, networking opportunities, individual development planning, mentoring, workshops, and related resources to OCC employees to assist them in reaching their full potential while maximizing their contributions to the agency. Employees utilizing the center take personal responsibility for managing their careers, and in turn the OCC provides resources to support their efforts. As part of the center, the OCC
 - ✓ released the Individual Development Plans (IDP) Dashboard and offered forums and webinars to employees and managers on developing their IDPs. The agency also offered the “Career Development Conversations” course to help facilitate career discussions between employees and managers.
 - ✓ began the process to offer a formalized Mentoring Program through its Integrated Talented Management System (ITM) in FY 2020.
- Continued to sponsor 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-to-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 FY 2019, the OCC continued to provide robust training and development to participants selected for LEAD last year (FY 2018). Of the 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.
- Offered the “Women in Leadership” course, designed to build influencing skills for existing and emerging women leaders. The course explores the gender dynamics of organizational influence, enhances awareness of personal influencing strengths, builds new influencing skills, and provides tools for increasing the ability of women leaders to effect interpersonal and organizational change. In FY 2019, 72 employees participated: 95.8 percent (69) were females; 23.6 percent (17) were supervisors/team leaders; 16.7 percent (12) were Blacks, 9.7 percent (7) were Hispanics and Asians (each); and 5.6 percent (4) were individuals with disabilities.

Part E.5 - Executive Summary: Planned Activities

In FY 2020, 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.

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

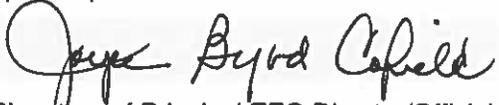
I, Joyce B. Cofield am the
(Insert name above) (Insert official title/series/grade above)

Principal EEO Director/Official Office of the Comptroller of the Currency (OCC)
for
(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.

1/13/2020
Date


Signature of Agency Head or Agency Head Designee

1/14/2020
Date

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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 2019, the OCC's participation rate was down from the previous year's rate of 41.7 percent to 32.1 percent (9 of 28).

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?	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)

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		(Yes or No)		
06/30/2017	Analyze survey response data to determine if there are any best practices that the OCC ADR Program can benefit from implementing.	Yes		09/30/2019
08/30/2017	Conduct an ADR Managers Forum or Brown Bag Session 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		09/30/2019
09/30/2017	Continue to review EEO intake forms where EEO-ADR was offered but not accepted, and analyze reasons why EEO-ADR was declined.	Yes		09/30/2019
09/30/2017	Continue to use and analyze feedback provided on ADR participant surveys.	Yes		09/30/2019
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		09/30/2019
03/31/2017, 09/30/2017	Continue to conduct EEO briefings with Executive Committee members, and include information on EEO-ADR at the OCC.	Yes		09/30/2019
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		09/30/2019
09/30/2018	Highlight ADR in a revised module in the FY 2020 mandatory No FEAR Act training.	Yes	9/30/2020	
09/30/2019	Participate in the Treasury-wide ADR Working Group, organized to assist bureaus to improve ADR participation rates and improve settlement rates, via resource developed for an ADR tool chest and sharing ADR best practices.	Yes		09/30/2019

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Report of Accomplishments

Fiscal Year	Accomplishments
FY 2019	<p>In FY 2019, the OCC experienced a decrease in its EEO-ADR participation rate. This year's EEO-ADR participation rate was 32.1 percent (9 of 28), compared with 41.7 percent in FY 2018. Of the 28 total cases completed in FY 2019, 20 (71.4 percent) were eligible for EEO-ADR (9 participated and 11 declined). While we offer EEO-ADR to all who are eligible, 28.6 percent (8 out of 28) were ineligible for EEO-ADR based on the EEO-OCC's ADR policy (two anonymous, three external applicants, one termination and two 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 trial/probationary period, or other non-employees; criminal activity; and waste, fraud, or abuse, are ineligible for EEO-ADR. EEO-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 2019 would have been 45.0 percent (9 of 20 eligible cases participated in EEO-ADR). Despite the decrease in the EEO-ADR participation rate, the resolution rate in FY 2019 was 50.0 percent; one in two completed pre-complaints did not become formal EEO complaints.</p> <p>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.</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, and 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 2019, Hispanic female bank examiners represented 3.2 percent of the OCC’s workforce, compared with the 2010 OCLF rate of 3.7 percent. Hispanic males in non-major occupational groups represented 2.9 percent of the workforce, compared with the 2010 NCLF rate of 5.2 percent.</p>

EEO Group(s) Affected by Trigger

EEO Group	
All Men	
All Women	
Hispanic or Latino Males	Yes
Hispanic or Latino Females	Yes
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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EEO Group
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

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
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., Hispanic Organization for Leadership and Advancement (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,	Yes	Reviewed several federal and private sector reports,

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
EEOC, MSPB, GAO, OPM)		and special interest groups (e.g., Government Accountability Office (GAO), EEOC, National Hispanic Leadership Agenda, Diversity Conference, and 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

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

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
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.

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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 Workforce Planning--Recruitment Plan that are applicable.		09/30/19
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.		09/30/19
09/30/18	Continue to further develop strong relationships 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).		09/30/19

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Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/18	Work with District Recruitment Specialists to ensure targeted programs for attracting Hispanic talent to the OCC.		09/30/19
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.		09/30/19
09/30/18	Continue to explore ways to expand applicant pools for non-major occupational positions (Hispanic-populated job fairs, internships, Hispanic associations).		09/30/19
09/30/18	Recruit students using the financial internship program for MCBS.		09/30/19
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.		09/30/19
09/30/18	Invite OCC speakers to HOLA annual and quarterly calls to discuss OCC career opportunities.		09/30/19
09/30/18	Continue to direct OCC job opportunities and postings to the HOLA membership.		09/30/19
09/30/18	Continue to promote Hispanic participation in management, leadership, and career development programs.		09/30/19
09/30/18	HOLA members will participate in OCC outreach at the annual conferences of Latin American organizations, including LULAC and UnidosUS,	09/30/20	

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Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
	formerly La Raza.		
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.		09/30/19
09/30/19	Establish a focused full-time, temporary Diversity and Inclusion 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.		09/30/19

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2019	<p>In FY 2019, the low participation rate of Hispanic employees remained a priority area for the OCC. Although the overall number of Hispanics in the agency decreased, the percentage of Hispanics increased slightly to 7.4 percent in FY 2019, a 0.1 percentage point increase from 7.3 percent in FY 2018, and a 2.3 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 (7.2 percent), Hispanic participation overall is at parity.</p> <p>The low participation rate of Hispanics in non-major occupational groups (7.5 percent vs. 10.0 percent NCLF rate) continued to be a major influence in the overall disparity of Hispanics in the agency. In FY 2019, Hispanic males in these groups participated at 2.9 percent in the workforce, compared with 5.2 percent in the NCLF and a 0.1 percentage point decrease from FY 2018. Hispanic females participated at 4.6 percent in the workforce, compared with 4.8 percent in the NCLF, remaining stable from FY 2018.</p> <p>Since FY 2018, Hispanic male and female participation rates in non-major occupational groups decreased slightly from 7.6 percent to 7.5 percent in FY 2019. The hiring rate of Hispanics in these groups was above the NCLF rate (12.0 percent vs. 10.0 percent) and an increase above the FY 2017 rate of 8.6 percent. All females were hired (12.0 percent) in FY 2019.</p> <p>In FY 2019, separations were above the workforce participation rate (8.0 percent vs. 7.5 percent) for Hispanics in non-major occupational groups; but males separated below their workforce participation rate (2.3 percent vs. 2.9 percent).</p>

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	<p>The OCC's overall low participation rate of Hispanics is also influenced by the disparity of Hispanic bank examiners. In FY 2019, 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 percentage of Hispanic bank examiners remained stable (7.3 percent).</p> <p>Hispanic bank examiners were hired at a rate greater than their OCLF rate (9.1 percent vs. 6.8 percent). Hispanic male bank examiners were hired above their OCLF rates (7.6 percent vs. 3.1 percent). Separations were below their workforce participation rate for Hispanic females (3.1 percent vs. 3.2 percent).</p> <p>The Entry-Level Bank Examiner Recruitment Program continued to be a significant source for Hispanic hiring at the OCC. In FY 2019, 13.1 percent (8) of entry-level bank examiners self-identified as Hispanics, above the 6.8 percent OCLF.</p> <p>The OCC conducted an applicant flow data analysis on job vacancies closed in FY 2019 during the first three quarters, and made up of entry examiner positions, by ethnicity (Hispanic and non-Hispanics). The applicant pool rate for Hispanics who self-identified was 14.4 percent with a selection rate of 13.3 percent; the applicant pool rate and selection rate exceeded the NCLF rate of 10.0 percent. Results indicated there was no evidence of a statistically significant shift in the ethnic composition of the applicant pool as they progressed to the decision process. This is a marked improvement from significantly low rates of the last two years. The OCC will continue to monitor the applicant pools and the impact of hiring processes.</p> <p>The OCC conducted a separate applicant flow data analysis of the entry-level bank examiner recruitment campaign in 2019 (Fall 2018). The applicant pool rate for Hispanics who self-identified was 15.1 percent, with a selection rate of 13.7 percent; the applicant pool and selection rate exceeded the Hispanic examiner OCLF rate of 6.8 percent.</p> <p>In FY 2019, the Honors Attorney Program continued developmental opportunities for the hires from the prior year (FY 2018)—eight employees; six of which were law clerks, four (66.7 percent) were Hispanics. The program is 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. There were no hires for the Honors Attorney Program in FY 2019.</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 (8.2 percent) participated in several formal and informal career development programs and training courses that provided learning and continuous growth opportunities in FY 2019. 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 (8.3 percent) at rates exceeding their participation in the bank examiner workforce (7.3 percent). Hispanic employees (11.8 percent) selected last</p>
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	<p>year (FY 2018) continued to receive robust training and development in the OCC's FY 2018-2019 Leadership Exploration and Development (LEAD) Program. The program is 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 (7.5 percent) participated in agency-sponsored leadership training courses designed for managers, supervisors, and employees. Hispanic executives (6.1 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, and 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 2019, female bank examiners' participation in the workforce was 38.4 percent, below their 2010 OCLF rate (45.3 percent).

EEO Group(s) Affected by Trigger

EEO Group	Yes
All Men	
All Women	Yes
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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EEO Group
American Indian or Alaska Native Females
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 A6, A8, and 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 The Women’s Network (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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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
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

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

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
<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 and Chief Operating Officer	Morris Morgan	Yes
Senior Deputy Comptroller for Large Bank Supervision (LBS)	Maryann Kennedy	Yes
Senior Deputy Comptroller for Midsize and Community Bank Supervision (MCBS)	Blake Paulson	Yes
Senior Deputy Comptroller for Bank Supervision Policy	Grovetta Gardineer	Yes
Senior Deputy Comptroller and Chief Counsel	Jonathan Gould	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.		09/30/19
09/30/18	Enhance current recruitment sources to ensure applicant pools of qualified female candidates.		09/30/19
09/30/18	Expand the Entry-Level Bank Examiner Recruitment Program efforts and recruitment		09/30/19

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Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
	strategy and develop relationships with additional women's colleges.		
09/30/18	Engage the expertise of district recruitment specialists to target and recruit diverse female bank examiner candidates.		09/30/19
09/30/18	Recruit students through the District Financial Internship Program.		09/30/19
09/30/18	Secure an Inter-agency Agreement (IAA) with the Office of Personnel Management (OPM) to administer the assistant bank examiner assessments as a temporary solution while securing a long-term solution with a vendor. FY 2020 will be dedicated to securing a contract while having the IAA in place as a bridge.		09/30/19
09/30/18	Continue to promote diversity in recruiters and interview panels.		09/30/19
09/30/18	Participate in the Women's MBA Conference; Women in Wealth Management Conference; Black Accountants national and regional conferences and career fairs; and the Community Reinvestment and Fair Lending Conference.	09/30/20	
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).	09/30/20	
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.		09/30/19
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.		09/30/19
09/30/18	Support more internal mentoring circles to engage		09/30/19

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Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
	with female employees on how to balance the responsibilities of work and family.		
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.		09/30/19
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.		09/30/19
09/30/18	Continue regular reviews with senior management and ENG's to highlight areas of concern and opportunities for improvement.		09/30/19

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2019	<p>In FY 2019, the workforce participation rate of female bank examiners decreased slightly to 38.4 percent from 39.1 percent in FY 2018, 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 43.8 percent, above their workforce participation rate (38.4 percent) and their rate of separations in FY 2018 (34.6 percent). The hiring rate (31.8 percent) of female bank examiners was below their OCLF rate (45.3 percent) and their hiring rate in FY 2018 (34.7 percent). Hiring rates for female bank examiners in key bank supervision groups were, for MCBS, 32.1 percent entry-level (pre-commissioned); and for LBS, 37.5 percent experienced-level.</p> <p>In addition, the OCC hired 61 entry-level bank examiners, of which 32.8 percent (20) were females, below the FY 2018 hiring rate (43.2 percent).</p> <p>The OCC conducted an applicant flow data analysis of the entry-level bank recruitment campaign in 2019 (Fall 2018). The applicant pool rate for females who self-identified was 37.7 percent with a selection rate of 35.3 percent; the applicant pool and selection rate were below the female bank examiner OCLF rate of 45.3 percent. The OCC also conducted a separate applicant flow analysis on examiner vacancies closed during the first three quarters of FY 2019 (including entry-level examiners) by gender. The applicant pool rate for females who self-identified was 37.4 percent and the selection rate was 44.3 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 pools as they reached the selection</p>

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	<p>processes.</p> <p>Female bank examiners were promoted at a higher rate (44.7 percent) than their participation in the workforce (38.4 percent). During FY 2019, three Uniform Commission Examination (UCE) testing sessions were held. Of the 48 bank examiners who successfully passed the UCE, 37.5 percent (18) were females: below their average availability pool rate (39.0 percent) and the FY 2018 rate (46.4 percent).</p> <p>The OCC continued to hire financial interns in its district offices. In FY 2019, the districts hired two financial interns, both of whom were females.</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 2019, nine surveys/focus group sessions were conducted.</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. Four mentoring circles were offered in FY 2019 to help employees successfully address career issues. Mentoring circle topics include “Career Exploration,” “Work/Life Balance,” “Uniform Commission Examination Preparation,” and “Leadership.” A total of 14 mentors, 90 mentees, and 12 mentoring committee members participated in the circles: 84.4 percent (108) were female, 19.5 percent were Black, 7.8 percent were Asian, 4.7 percent were Hispanic, and 1.6 percent were Small ERI groups. The participation rate for all groups, except females, was lower than the rates in FY 2018 although the total number of participants was greater.</p> <p>In addition, TWN launched its Resource Groups mentoring program with two resource groups—“Managing Your Career” and “Work Life Navigation,” in which over 130 employees participated in 393 informational SharePoint site visits, three teleconferences, and three cadre chats.</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 and 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 2019, females overall and females in all EEO groups in senior-level position (SLP) were participating below their workforce participation rates or absent: females (30.2 percent vs. 44.3 percent) and minorities (28.3 percent vs. 35.6 percent).</p>

EEO Group(s) Affected by Trigger

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

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

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
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 cause 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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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
		framework.
Interviews	Yes	Reviewed interview data from various groups (e.g., The Women’s Network (TWN) and other employee network groups (ENG), 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

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

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
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

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 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)

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	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.		09/30/19
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 (currently on hold).		09/30/19
09/30/18	Conduct a Succession Planning Program Review. Expand the succession management model to include a new, competency-based enterprise-wide process, with greater transparency and employee input.		09/30/19

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Report of Accomplishments

Fiscal Year	Accomplishments
FY 2019	<p>The low participation of females and minorities in supervisor roles and SLP remained a challenge during FY 2019. Females participated at 44.3 percent in the workforce and held 38.0 percent of supervisor positions and 30.2 percent of SLP; both rates remained below their workforce participation rate. Female participation rates decreased in supervisor roles (1.5 percentage points) and SLP (1.9 percentage points) between FY 2018 and FY 2019.</p> <p>Like females, minorities also participated in supervisor roles and SLP below their overall workforce participation rates; however, minorities increased their participation in FY 2019. Minorities participated at 35.6 percent in the workforce and held 27.0 percent of supervisor positions and 28.3 percent of SLP. Minority participation rates increased in supervisor roles (0.8 percentage points) and SLP (3.3 percentage points). Black males and females, Hispanic males and females, and Asian males and females increased in their percentage of SLP, although they remain below their workforce participation rates, with the exception of Asian males. Asian males are above parity in SLP. An Asian female was added to a SLP in FY 2019. In supervisor roles, participation rates of all minority groups increased in FY 2019, except Hispanics and Small ERI groups.</p> <p>In addition, females (52.4 percent) and minorities (32.0 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 (47.2 percent) and minorities (21.4 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 2019. Participation rates increased from FY 2018 for females by 6.6 percentage points, and decreased for minorities by 0.3 percentage points.</p>

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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, and 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	
Hispanic or Latino Males	Yes
Hispanic or Latino Females	Yes
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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EEO Group
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, and 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)	Yes	Reviewed complaints trend data to determine if Hispanics raised common issues.
Grievance Data (Trends)	Yes	Reviewed grievance data to determine any trends in cases raised by Hispanic employees.
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	Reviewed grievance data on selections to determine any trends in cases raised by female and minority employees.
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	Yes	Reviewed Hispanic focus group data results on their work experiences, retention, and career development of Hispanic employment in the OCC.
Interviews	Yes	Reviewed interview data from various groups (e.g., Hispanic Organization for Leadership and Advancement (HOLA), recruiters, interviewers/panelists, staffing specialists, hiring officials) regarding their experiences and opinions concerning the low representation, career development, and retention of Hispanic employment in the OCC.
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	Yes	Reviewed Hispanics' rate of participation in career

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
		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

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. Establish a Diversity and Inclusion Program Manager (D&I PM) position to complete the barrier analysis, and develop an action plan and implementation process.		09/30/2019
09/30/20	Develop an action plan and implementation process.		

Report of Accomplishments

Fiscal Year	Accomplishments
	In FY 2019, OMWI established a temporary D&I PM through the agency's Opportunities Board to lead the Hispanic Barrier Analysis Project. The D&I PM conducted an enterprise assessment of the OCC's Hispanic workforce. The assessment identified potential vulnerabilities during the employment life cycle that could present as barriers within various business units. For bank examiners, the focus was on retention and advancement, and for non-examiners it was recruitment, hiring, development, and retention. In

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FY 2019	<p>addition, special analyses were conducted on career progression for bank examiners and non-bank examiners. Analyses were also done to better understand examiner turnover occurring in the first year. Preliminary high-level findings showed the following:</p> <ul style="list-style-type: none">• Hispanic pre-commissioned bank examiners take 1.7 years longer on average to get to NB-V (GS-13 equivalent), creating a salary gap that continues throughout their career.• Promotion from NB-V to NB-VI (GS-13 and GS-14 equivalent) takes Hispanics examiners 1.4 years longer on average to achieve. Results are mixed at the GS-15 level. Over a longer period, the rate of promotion was more in line with the participation rate. More recent data, however, reflect promotions taking longer.• The average promotion rate for Hispanic non-examiners in pay band NB-V to NB-VI (GS-13 to GS-14) is almost twice their participation rate. The average promotion rate from NB-VI to NB-VII (GS-14 and GS-15 equivalent), however, is low at best and in most cases absent.• Hispanic employees relocate/change duty states as much as their workforce participation rate, and there is no evidence to support the hypothesis that Hispanics relocate less than other racial groups. <p>In addition, exit survey and FEVS results noted that the low retention levels for Hispanic employees were likely due to concerns with career growth, office morale, pay, and employees not feeling encouraged or empowered. In addition, there has been low and at times an absence of Hispanic participation in developmental programs. To help provide information on low participation in development programs and insight on mentoring, the OCC held focus group sessions and conducted interviews with existing employees.</p> <p>In addition to internal data, the OCC held focus group sessions with employees to hear directly about their career experiences and conducted interviews with numerous former Hispanic employees to better understand their reasons for leaving the agency and determine lessons we could learn to improve our workforce retention. The D&I PM partnered with the HOLA to conduct several focus group sessions. Also, numerous one-on-one interviews were held with existing Hispanic employees, including managers, as well as non-Hispanic managers, to understand what is important to Hispanic employees and how they can be retained.</p> <p>Several meetings were held with Comptroller Otting, the EC, HC, and numerous business managers to brief them on the progress of the project and obtain their commitment to advance Hispanic participation at the OCC.</p> <p>In FY 2020, the OCC will perform analyses of feedback obtained from focus group sessions and interviews with former and current Hispanic examiners. In addition, benchmarking of internal results will be conducted with external organizations and evaluated and shared with respective business line managers, along with additional research on topics such as mentoring for vulnerable populations. A Strategic Plan for Hispanic employees will be developed and shared with senior management and</p>
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	<p>HOLA. A summary report of findings and recommendations for ongoing monitoring of progress from the barrier analysis will be prepared at the conclusion of the project.</p>
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MD-715 – Part J

Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 C.F.R. § 1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with reportable and targeted disabilities in the federal government.

Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

- | | | |
|--------------------------------|--------------|------|
| a. Cluster GS-1 to GS-10 (PWD) | Yes X | No 0 |
| b. Cluster GS-11 to SES (PWD) | Yes X | No 0 |

New B4-1:

The participation rates for PWD at both grade clusters, GS-1 to GS-10 and GS-11 to SES,² were 11.34 percent and 8.73 percent, respectively, in FY 2019, below the 12 percent goal.

Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

- | | | |
|---------------------------------|--------------|-------------|
| a. Cluster GS-1 to GS-10 (PWTD) | Yes 0 | No X |
| b. Cluster GS-11 to SES (PWTD) | Yes X | No 0 |

New B4-1:

The participation rate of PWTD in the GS-11 to SES cluster was 1.95 percent in FY 2019, which falls below the goal of 2 percent.

- Describe how the agency has communicated the numerical goals to the hiring managers and/or recruiters.

² SES equivalent positions in the OCC are SLPs, NB-VIII, and NB-IX.

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Numerical goals are communicated through a variety of methods, including the agency's balanced scorecard, internal presentations and briefings, such as the annual MD-715 review, annual business unit briefings, and all special request workforce analyses and reports. The annual MD-715 summary is posted on the OCC's website.

Section II: Model Disability Program

Pursuant to 29 C.F.R. §1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If "no", describe the agency's plan to improve the staffing for the upcoming year.

Yes **X** No 0

Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTB	30	1	0	Edner Escarne, Director for Talent Acquisition, Talent Acquisition, Office of Human Capital, Edner.Escarne@occ.treas.gov
Answering questions from the public about hiring authorities that take disability into account	30	1	0	Edner Escarne, Director for Talent Acquisition, Talent Acquisition, Office of Human Capital, Edner.Escarne@occ.treas.gov
Processing reasonable accommodation requests from applicants and employees	1	0	0	Kelly Gauvin National Accommodation Coordinator, Workforce Relations and Performance Management, Office of Human Capital,

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				Kelly.Gauvin@occ.treas.gov
Section 508 Compliance	72	0	0	<p>Susan O'Brien, IT Accessibility Program Manager Susan.Obrien@occ.treas.gov</p> <p><i>Major Groups w/508 Compliance Work:</i></p> <p>Bridget Plitt, Director, Educational Program Development, Bridget.Plitt@occ.treas.gov; Wendy Frederick, Director, Training Operations, Wendy.Frederick@occ.treas.gov</p> <p>Bryan Hubbard, Deputy Comptroller for Public Affairs, Public Affairs, Bryan.Hubbard@occ.treas.gov</p>
Architectural Barriers Act Compliance	7*	1*	3*	<p>Hans Heidenreich, Director for Workplace Services, Workplace Services, Administrative Operations, Hans.Heidenreich@occ.treas.gov</p>
Special Emphasis Program for PWD and PWTD	4	0	0	<p>Joyce Cofield, Executive Director, Office of Minority and Women Inclusion, Office of Minority and Women Inclusion, Joyce.Cofield@occ.treas.gov</p>

*NOTE: The OCC relies on architectural design contractors with a licensed professional engineer with Americans with Disabilities Act (ADA) training to design and assist with the construction of OCC leased space. The Workplace Services, Space, and Facilities team is responsible for oversight of the contract and coordinating with the design team during the buildout process.

Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the training that disability program staff have received. If “no”, describe the training planned for the upcoming year.

Yes X

No 0

The National Accommodation Coordinator takes annual training courses to maintain the ADA Coordinators Certification and to remain abreast of the latest reasonable accommodation (RA) regulations, case law, news, and issues.

All human resources (HR) professionals are required to complete online courses related to veterans' employment, which includes disability components. This training, provided by the Treasury Department, is mandated by Executive Order (EO) 13518. HR representatives are also required to complete annual

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training on the No FEAR Act, which includes a disability component.

The OCC plans a more focused training effort for all HR Specialists who are responsible for advising hiring managers regarding use of special hiring authorities. In addition, the OCC's Recruitment Skills Course for hiring managers will be updated to include additional information about special hiring authorities.

The Workplace Services team receives contracting officers training for overseeing contractor performance.

PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If "no", describe the agency's plan to ensure all aspects of the disability program have sufficient funding and other resources.

Yes X

No 0

Section III: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. § 1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency's recruitment program plan for PWD and PWTD.

A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.

- Utilizes the Workforce Recruitment Program (WRP) as a source for recruiting disabled students and graduating seniors, including disabled veterans.
- Maximizes the Pathways Intern Program to hire interns with targeted disabilities.
- Continues efforts to outreach to Disability and Military Student offices to promote internship opportunities.
- Participates in recruitment events, fairs, and conferences, e.g., Hiring Heroes, Federal Disability Workforce Consortium, Department of Labor's WRP Training, and the Treasury Department's Veteran Employment Summit at the Treasury Executive Institute to market the OCC and its job opportunities.
- Continues to explore networking websites to enhance outreach efforts to individuals with disabilities.
- Works with HR Specialists and selecting officials, by way of training, communication meetings, to encourage the use of special appointing authorities. Additionally, RA statements are included on all job announcements to ensure applicants with disabilities are informed of available RA.
- Encourages all managers and supervisors to consider the benefits of hiring individuals with

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disabilities and using the Schedule A hiring authority.

Pursuant to 29 C.F.R. § 1614.203(a)(3), describe the agency's use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce.

OCC positions can be filled by using Schedule A and Veterans' Appointment Authorities to non-competitively appoint PWD and PWTD and veterans with a service-connected disability rating of 30 percent or more. The OCC's primary source for Schedule A and Veteran resume searches is the use of the WRP's database and working closely with Treasury's Veteran Employment Office. OCC's Schedule A Program Manager (PM) continues to evaluate upcoming and current positions for marketing to veterans and PWD. We continue to leverage non-competitive hiring authorities and extend partnerships with veteran service organizations. The PM also received resumes via email from Schedule A applicants and forwarded them to the servicing HR Specialists, as well as alerted candidates to submit their resumes online. The PM alerted both hiring managers and HR staffing specialists on the value of hiring external disabled applicants and available resources for locating such candidates.

When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority and (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

When individuals apply utilizing the Schedule A hiring authority, their applications are reviewed by the servicing HR specialist who confirms that the applicants meet the qualification requirements of the announced position and have provided required proof of disability. Applicants applying under the Schedule A hiring authority who are deemed qualified are referred to the hiring manager on a Schedule A certificate of eligibility with guidance on selection procedures including the application of veterans' preference, when applicable. Managers have the option to interview and/or hire from the Schedule A certificate or to consider other candidates from other issued certificates (Merit Promotion, Non-Competitive, Veterans Recruitment Appointment, etc.).

Alternatively, when individuals submit their resumes directly to the Special Placement Program Coordinator (SPPC) for vacant positions within OCC, the SPPC refers the applicant to the www.occ.gov/careers website to apply for any specific job announcement for which they want consideration. They are also reminded to submit supplemental documentation that makes them eligible for a Schedule A appointment. We also inform them, via email, they must clearly state in the application that they wish to apply via Schedule A.

Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the agency's plan to provide this training.

Yes X

No 0

N/A 0

- Veteran Employment Training for Federal Hiring Managers: All OCC managers, supervisors, and selected human resource professionals are required to complete online courses related to veterans' employment. This training, provided by the Treasury Department, is mandated by EO 13518 and assigned to those individuals required to take it in the Integrated Talent Management learning system. This training is provided to all newly hired managers or those who become managers and

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- selected HR professionals throughout the year, and annually to managers, supervisors, and selected HR professionals.
- Merit System Principles, Prohibited Personnel Practices, and Whistleblower Protection: This course covers the merit system principles, prohibited personnel practices, whistleblower protection, role of the Whistleblower Ombudsman and role of the Office of Special Counsel. Training offered minimally every three years.
 - Human Capital Fundamentals for New Managers: This training reviews the OCC's manager roles and responsibilities, providing guidance to help newly hired or promoted managers. Topics covered include competencies that are central to the manager's role and responsibilities in human capital management and HR processes that are essential to successfully performing supervisor functions (e.g., managing telework, administering leave, managing travel, and the use of hiring authorities including those that take disabilities into account). These sessions are offered two to three times a year for new managers.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

Describe the agency's efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

- Hold periodic meetings with professional organizations to share the OCC's process for providing vacancy announcements, and sharing information about opportunities, including career development tracks.
- Attend specialty conferences and career/job fairs to share information about the OCC's mission, work environment and job opportunities.
- Host brown-bag lunches and roundtable discussions with organizations that assist PWD/PWTD, hiring managers/senior management, and HC.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If "yes", please describe the triggers below.

- | | | |
|---|--------------|-------------|
| a. New Hires for Permanent Workforce (PWD) | Yes X | No 0 |
| b. New Hires for Permanent Workforce (PWTD) | Yes 0 | No X |

New B1:

- PWD Hires: 8.70 percent vs. 12.0 percent

Hiring rate for PWD was below the Section 501 goal of 12.0 percent.

2. Using the **qualified applicant pool** as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below.

- | | | |
|----------------------------|-------|-------------|
| a. New Hires for MCO (PWD) | Yes 0 | No X |
|----------------------------|-------|-------------|

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b. New Hires for MCO (PWTD) Yes 0 No X

Combination of the new B6 in Workforce Analytics (WA) and the new B6 in Monster Analytics (Monster). NA in qualified applicant means Not Available. NH in hires means No Hire.

FY 2019 Hires	Qualified vs. Hires	Qualified vs. Hires
0110 (0) Hires:	PWD: 22.2% - NH	PWTD: 2.22% - NH
0570 (66) Hires:	PWD: 4.69% - 4.55%	PWTD: 1.12% - 1.52%
0905 (1) Hires:	PWD: NA - 0.00%	PWTD: NA - 0.00%

The OCC noted a slight difference (0.14%) in the occupational series 0570 when comparing the qualified applicant flow data with the hires for PWD. The difference is less than 1 percent and not considered a trigger at this time.

As attorneys (0905) and economists (0110) have limited hiring, there were not enough hires to determine if there is an actual trigger. With limited hiring there cannot be a realistic expectation that all groups (PWD and PWTD) would be hired at rates comparable to their qualification rates.

3. Using the **relevant applicant pool** as the benchmark, do triggers exist for PWD and/or PWTD among the **qualified internal applicants** for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

- a. Qualified Applicants for MCO (PWD) Yes X No 0
- b. Qualified Applicants for MCO (PWTD) Yes X No 0

New B6 in Monster relevant applicant pool is the applied compared with the qualified. NA in qualified applicant means Not Available.

FY 2019 Promotions	Applicants vs. qualified	Applicants vs. qualified
0110 (2) Promotions:	PWD: 6.12% - 0.00%	PWTD: 1.02% - 0.00%
0570 (1) Promotions:	PWD: 6.75% - 3.55%	PWTD: 1.42% - 0.99%
0905 (0) Promotions:	PWD: 3.57% - NA	PWTD: 1.19% - NA

NOTE: The Treasury Department/OCC is currently working with its Workforce Analytics contractors to validate its data and align the guidance for internal competitive promotions requested from the EEOC.

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4. Using the **qualified applicant pool** as the benchmark, do triggers exist for PWD and/or PWTD among **employees promoted** to any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

- | | | |
|------------------------------|-------|-------------|
| a. Promotions for MCO (PWD) | Yes 0 | No X |
| b. Promotions for MCO (PWTD) | Yes 0 | No X |

New B6 in WA and the new B6 in Monster. Compare qualified applicants with promotion in the MCOs. NS in employees’ promotions means No Selection. NA in qualified applicant means Not Available.

FY 2019 Promotions	Qualified vs Promotions	Qualified vs Promotions
0110 (2) Promotions:	PWD: 0.00% - 0.00%	PWTD: 0.00% - 0.00%
0570 (1) Promotions:	PWD: 3.55% - 0.00%	PWTD: 0.99% - 0.00%
0905 (0) Promotions:	PWD: NA - NS	PWTD: NA - NS

NOTE: The Treasury Department/OCC is currently working with its Workforce Analytics contractors to validate its data and align the guidance for internal competitive promotions requested from the EEOC.

Section IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

A. ADVANCEMENT PROGRAM PLAN

Describe the agency’s plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

- Encourage diverse employee (including PWD/PWTD) participation in management, leadership, and career development programs through employee network groups (ENG) and a variety of other communication venues throughout the agency. Developmental opportunities will continue to be broadly communicated to all employees through internal weekly (“What’s New at OCC”) and monthly (*SuperVisions*) newsletters, and website postings. Opportunities also will be shared by ENGs.
- Managers will be reminded to consider PWD/PWTD for developmental opportunities as part of their Individual Development Planning process. All vacancy announcements will be posted on the OCC internal careers website.

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B. CAREER DEVELOPMENT OPPORTUNITIES

Please describe the career development opportunities that the agency provides to its employees.

- The EXCEL I Program, sponsored by the Large Bank Supervision (LBS) department, provides bank examiners in pay band NB-V the opportunity to develop expertise in one of eight specialty areas.
- The EXCEL II Program expanded professional development opportunities for bank examiners in pay band NB-IV in the eight specialty areas of the EXCEL I Program.
- Midsize and Community Bank Supervision (MCBS) Pre-commission Bank Examiners Career Forums provide information about bank examiner career opportunities and explain the Uniform Commission Examination (UCE) preparatory process.
- The Honors Attorney Program is designed to provide cross-training and developmental assignments to equip attorneys with legal skills and experiences across multiple legal practices areas.
- The Leadership Exploration and Development (LEAD) Program is an enterprise-wide leadership development program targeted to employees at the NB-V to NB-VI.2 levels, to help develop specific competencies aligned to skills and abilities needed at the team leader and/or manager level.
- The MCBS NB-V Career Forum for Bank Examiners provides bank examiners exposure to the career options available in the various bank supervision lines of business, and resources and factors to consider when making career decisions. It also provides opportunities to network with senior leaders throughout the agency.
- Non-examiner Career Forums provide non-examiners exposure to the variety of career options in the non-examiner lines of business.
- Agency training and development courses are available to all employees, in the classroom, online, virtual, and self-study.
- Temporary details and short-term work assignments are advertised to all employees on the agency's Opportunities Board.

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C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

- a. Awards, Bonuses, & Incentives (PWD) **Yes X** No 0
- b. Awards, Bonuses, & Incentives (PWTD) Yes 0 **No X**

New WA B9-2. Compare the inclusion rates for PWD and PWTD with the rates for people with no disabilities.

Time-off hours	PWD	PWTD	No Disability
1-10	0.00%	0.00%	1.20%
11-20	0.00%	0.00%	0.09%
21-30	0.00%	0.00%	0.06%
31-40	NA	NA	NA
Awards	PWD	PWTD	No Disability
< \$500	46.20%	52.78%	42.71%
\$501-999	27.66%	37.50%	24.67%
\$1000-1999	7.90%	12.50%	9.03%

The inclusion rates for PWD and PWTD fell below the inclusion rates for employees with no disabilities in three time-off awards categories.

The OCC noted differences in inclusion rates for PWD and PWTD time-off awards when comparing the inclusion rates of employees with no disabilities. The difference is less than 1 percent and it is not considered a trigger at this time.

The inclusion rate for PWD fell below the inclusion rates for employees with no disabilities in the \$1000-1999 cash award category.

The OCC noted differences in inclusion rate for PWD in \$1000-1999 (1.13 percent) cash awards when comparing the inclusion rates of employees with no disabilities. The difference is more than 1 percent and it is considered a trigger at this time.

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If “yes”, please describe the trigger(s) in the text box.

- a. Pay Increases (PWD) Yes 0 **No X**
- b. Pay Increases (PWTD) Yes 0 **No X**

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.

- a. Other Types of Recognition (PWD) Yes 0 No 0 **N/A X**
- b. Other Types of Recognition (PWTD) Yes 0 No 0 **N/A X**

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D. PROMOTIONS

1. Does your agency have a trigger involving PWD among the qualified *internal* applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

a. SES

i. Qualified Internal Applicants (PWD)	Yes X	No 0
ii. Internal Selections (PWD)	Yes 0	No X

b. Grade GS-15

i. Qualified Internal Applicants (PWD)	Yes 0	No X
ii. Internal Selections (PWD)	Yes 0	No X

c. Grade GS-14

i. Qualified Internal Applicants (PWD)	Yes 0	No X
ii. Internal Selections (PWD)	Yes 0	No X

d. Grade GS-13

i. Qualified Internal Applicants (PWD)	Yes 0	No X
ii. Internal Selections (PWD)	Yes 0	No X

New B7 WA and the new B7 Monster. NA in qualified applicant means Not Available.

Relevant Applicants/Qualified/Promotions

GS-13 - PWD: 15.15% - NA – 33.33%
 GS-14 - PWD: 10.05% - NA – 20.00%
 GS-15 - PWD: 6.53% - NA – 0.00%
 SES - PWD: 5.84% - 0.00% -0.00%

NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics.

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2. Does your agency have a trigger involving PWTD among the qualified *internal* applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

a. SES

i. Qualified Internal Applicants (PWTD)	Yes X	No 0
ii. Internal Selections (PWTD)	Yes 0	No X

b. Grade GS-15

i. Qualified Internal Applicants (PWTD)	Yes 0	No X
ii. Internal Selections (PWTD)	Yes 0	No X

c. Grade GS-14

i. Qualified Internal Applicants (PWTD)	Yes 0	No X
ii. Internal Selections (PWTD)	Yes 0	No X

d. Grade GS-13

i. Qualified Internal Applicants (PWTD)	Yes 0	No X
ii. Internal Selections (PWTD)	Yes 0	No X

New B7 WA and the new B7 Monster. NA in qualified applicant means Not Available.

Relevant Applicants/Qualified/Promotions

GS-13 - PWTD: 2.42% - NA – 16.67%

GS-14 - PWTD: 2.11% - NA – 0.00%

GS-15 - PWTD: 1.57% - NA – 0.00%

SES - PWTD: 1.95% - 0.00% - 0.00%

NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics.

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3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

- | | | |
|-----------------------------|-------|-------------|
| a. New Hires to SES (PWD) | Yes 0 | No X |
| b. New Hires to GS-15(PWD) | Yes 0 | No X |
| c. New Hires to GS-14 (PWD) | Yes 0 | No X |
| d. New Hires to GS-13(PWD) | Yes 0 | No X |

New B7 WA and the new B7 Monster. NA in qualified applicant means Not Available.

Qualified Applicants/Hires

GS-13 - PWD: NA – 12.50%
GS-14 - PWD: NA – 0.00%
GS-15 - PWD: NA – 33.33%
SES - PWD: NA- 0.00%

NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

- | | | |
|------------------------------|-------|-------------|
| a. New Hires to SES (PWTD) | Yes 0 | No X |
| b. New Hires to GS-15 (PWTD) | Yes 0 | No X |
| c. New Hires to GS-14(PWTD) | Yes 0 | No X |
| d. New Hires to GS-13 (PWTD) | Yes 0 | No X |

New B7 WA and the new B7 Monster. NA in qualified applicant means Not Available.

Qualified Applicants/Hires

GS-13 - PWTD: NA – 12.50%
GS-14 - PWTD: NA – 0.00%
GS-15 - PWTD: NA – 33.33%
SES - PWTD: NA – 0.00%

NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics.

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5. Does your agency have a trigger involving PWD among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

a. Executives

i. Qualified Internal Applicants (PWD)	Yes X	No 0
ii. Internal Selections (PWD)	Yes 0	No X

b. Managers

i. Qualified Internal Applicants (PWD)	Yes 0	No X
ii. Internal Selections (PWD)	Yes 0	No X

c. Supervisors

i. Qualified Internal Applicants (PWD)	Yes 0	No X
ii. Internal Selections (PWD)	Yes 0	No X

New B8 WA and the new B8 Monster. NA in qualified applicant means Not Available.

Qualified Applicants/Promotions

Executives - PWD: 0.00% - 0.00%

Managers - PWD: NA - 0.00%

There were no internal Supervisor vacancy announcements and selections.

NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics.

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6. Does your agency have a trigger involving PWTD among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

a. Executives

- i. Qualified Internal Applicants (PWTD) **Yes X** No 0
- ii. Internal Selections (PWTD) Yes 0 **No X**

b. Managers

- i. Qualified Internal Applicants (PWTD) Yes 0 **No X**
- ii. Internal Selections (PWTD) Yes 0 **No X**

c. Supervisors

- i. Qualified Internal Applicants (PWTD) Yes 0 **No X**
- ii. Internal Selections (PWTD) Yes 0 **No X**

New B8 WA and new B8 Monster. NA in qualified applicant means Not Available.

Qualified Applicants/Promotions

Executives - PWTD: 0.00% - 0.00%
Managers - PWTD: NA - 0.00%

There were no internal Supervisor vacancy announcements and selections.

NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics.

NOTE: The OCC has no “Supervisors” in GS-12 and below equivalent grades. The OCC’s supervisory/managerial positions begin at GS-13 and above equivalent levels.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box.

- a. New Hires for Executives (PWD) Yes 0 **No X**
- b. New Hires for Managers (PWD) Yes 0 **No X**
- c. New Hires for Supervisors (PWD) Yes 0 **No X**

New B8 WA and new B8 Monster. NA in qualified applicant means Not Available.

Qualified Applicants/Hires

Executives - PWD: NA - 25.00%
Managers - PWD: NA - 0.00%

There were no external Supervisor vacancy announcements and selections.

NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data

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through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics.

NOTE: The OCC has no "Supervisors" in GS-12 and below equivalent grades. The OCC's supervisory/managerial positions begin at GS-13 and above equivalent levels.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.

- | | | |
|-------------------------------------|-------|-------------|
| a. New Hires for Executives (PWTD) | Yes 0 | No X |
| b. New Hires for Managers (PWTD) | Yes 0 | No X |
| c. New Hires for Supervisors (PWTD) | Yes 0 | No X |

New B8 WA and new B8 Monster. NA in qualified applicant means Not Available.

Qualified Applicants/Hires

Executives - PWTD: NA - 25.00%
 Managers - PWTD: NA - 0.00%

There were no external Supervisor vacancy announcements and selections.

NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics.

NOTE: The OCC has no "Supervisors" in GS-12 and below equivalent grades. The OCC's supervisory/managerial positions begin at GS-13 and above equivalent levels.

Section V: Plan to Improve Retention of Persons with Disabilities

To be a model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace personal assistance services.

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If "no", please explain why the agency did not convert all eligible Schedule A employees.

Yes X No 0 N/A 0

In FY 2019, the OCC converted to career status two of the three Schedule A employees it hired in FY 2017; management officials are working on the conversion process for the remaining employee who became eligible at the end of the fiscal year.

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2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.

a. Voluntary Separations (PWD)	Yes X	No 0
b. Involuntary Separations (PWD)	Yes X	No 0

Old B14 in WA:

The inclusion rate for PWD exceeded the rate of persons with no disabilities for involuntary (0.30 percent vs. 0.06 percent) and voluntary separations (10.94 percent vs. 7.77 percent).

3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.

Voluntary Separations (PWTD)	Yes X	No 0
Involuntary Separations (PWTD)	Yes 0	No X

Old B14 in WA:

The inclusion rate of PWTD (12.5 percent) exceeded the rate of persons without disabilities for voluntary (7.77 percent).

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

In FY 2019, there were nine exit survey respondents with disabilities: five retired, three accepted other positions, and one resigned. A large majority (88.9 percent) indicated they would recommend the OCC/Treasury as a good place to work. Also, 77.8 percent of the respondents indicated they generally had a positive work experience, would return to work for the OCC/Treasury, and there was nothing that could have been done to prevent them from leaving the agency.

Job-related stress, training opportunities, workload, and skills and capabilities (work experience) were the reasons most often cited by PWD in the FY 2019 exit surveys. This differed from the agency-wide survey results, where job-related stress was cited most often.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 C.F.R. § 1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency’s public website for its notice explaining employees’ and applicants’ rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

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<https://www.occ.gov/about/policies/accessibility.html>
<https://www.helpwithmybank.gov/policies/policies-web-site.html>

Instructions on how to file a complaint:

<https://www.helpwithmybank.gov/policies/accessibility.html>

2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

<https://occ.gov/about/policies/accessibility.html>

To file a complaint, go to this webpage and click on the link titled "[File a Complaint](#)." For concerns about OCC's buildings and facilities, contact:

Facilities Management
Office: (202) 649-7288
TTY: (800) 877-8339 (via a relay service)

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

In FY 2019, the OCC finalized and implemented the policies and procedures manual on IT Accessibility (Section 508).

C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

7 business days or less

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2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

In FY 2019, 97 percent of RA requests were processed within the time frame set forth in the agency procedures. In addition, the agency provided assistive computing devices and technologies, software enhancements, and electric scooter support to assist employees with medical conditions. The OCC continued to use its dedicated accommodation room for completing confidential assessments and other types of ergonomic assessments. The OCC used an interagency agreement with the Federal Occupational Health Agency to conduct ergonomic consultation and assessments (e.g., fitness for duty) in FY 2019, and will continue to do so in FY 2020.

D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

Pursuant to 29 C.F.R. § 1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

During FY 2018, the OCC adopted the U.S. Department of Treasury's PAS policy and procedures, which follow the requirements established by the OPM. Training will be provided to all managers, supervisors, and selected HR professionals throughout FY 2020.

In addition, the Treasury Department has procured a Treasury-wide PAS contract. This contract will allow the OCC to establish a purchase order against the Treasury-wide base contract. The OCC is currently working with the procurement office to set up our blanket purchase agreement with Treasury.

Section VI: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the government-wide average?

Yes 0 **No X** N/A 0

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Yes 0 **No X** N/A 0

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3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?

Yes 0 **No X** N/A 0

2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?

Yes 0 **No X** N/A 0

3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

Section VII: Identification and Removal of Barriers

Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Yes X No 0

2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?

Yes X No 0 N/A 0

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments.

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Trigger 1	Lower than expected participation rate (percentage) of PWD in the following occupational series: National Bank Examiner (570), Attorney (905), Economist (110), and ITS (2210) compared with EEOC goal of 12 percent.	
Barrier(s)	Failure to consistently use specific outreach and recruitment strategies for PWD.	
Objective(s)	Increase outreach and recruitment to PWD.	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
All Executive Committee Members; and Joyce Cofield, Executive Director, Office of Minority and Women Inclusion		Yes
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
Yes		Yes
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Reviewed Tables B1, B6, B8, and B14S2 to track the participation pattern across demographics profiles of PWD in MCO to determine if there is growth in their participation rates.
Complaint Data (Trends)	Yes	Reviewed complaints trend data to determine if PWD 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 and responses that support the diversity and inclusion index for PWD in the FEVS.

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Exit Interview Data	Yes	Reviewed responses from PWD to determine common reasons for leaving the agency, and their work experiences.		
Focus Groups	Yes	Reviewed PWD interest group data results on their work experiences and opinions concerning the low representation of PWD employment in the OCC.		
Interviews	Yes	Reviewed interview data from various groups (e.g., interest groups, recruiters, interviewers/panelists, staffing specialists, hiring officials) regarding their experiences and opinions concerning the low representation of PWD employment in the OCC.		
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Reviewed several federal and private sector reports and data from special interest groups to gain additional information on best practices and solutions for addressing low participation of PWD in the OCC's workforce.		
Other (Please Describe)				
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/18	1. The OCC encourages the servicing HR specialists and recruiters to have active discussions with hiring managers when determining area of consideration to fill vacancies. Educating hiring managers regarding available legal authorities and hiring flexibilities will allow managers to tap into a diverse and active talent pool without going through the lengthy traditional hiring	Yes		09/30/19

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	process.			
09/30/18	2. Establish and maintain relationships with organizations that assist PWD in securing and maintaining employment. These organizations include local colleges, universities, and professional organizations.	Yes		09/30/19
09/30/18	3. Provide annual refresher training to HR Specialists about PWD hiring information.	Yes	09/30/20	
09/30/18	4. Use the WRP Program as a source for recruiting PWD and a pipeline for permanent positions.	Yes		09/30/19
09/30/18	5. The OCC will continue to look for ways to source positions for PWD in other job series (not identified in the trigger).	Yes		09/30/19
09/30/19	6. Explore opportunities for OCC representatives to present at a conference/recruitment event about careers in the federal government for PWD.	Yes	09/30/20	
09/30/19	7. Improve applicant tracking to enable use for individual vacancy applicant pools.	Yes		09/30/19
09/30/19	8. Host an in-house PWD information session near or on December 3, 2019, National Disability Day.	Yes	09/30/20	
09/30/20	9. Send out an email to all managers/supervisors as a reminder of all available special hiring authorities and resources in recruiting and hiring PWD and WRP positions.	Yes		

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Fiscal Year	Accomplishments
	<p>Between FY 2015 and FY 2019, PWD in mission-critical/major occupations (MCO)—bank examiners, attorneys, economists, and IT specialists—participated (6.1 percent) below the EEOC goal of 12.0 percent. In FY 2019, PWD increased participation in bank examiner (6.6 percent vs. 6.8 percent) and ITS specialist (10.5 percent vs. 10.6 percent) positions.</p> <p>PWD in MCO were hired (5.3 percent) from FY 2015 through FY 2019 on average below the EEOC goal of 12.0 percent. In FY 2019, 37.5 percent of the OCC hires with disabilities were in MCO, representing three bank examiners. There are limited hiring opportunities in the attorney and economist occupations. In addition, the OCC maintained its staffing priorities, resulting in fewer external hires in FY 2019, and it continued its focused effort on development and retention of the current workforce.</p> <p>Separations of PWD in MCO (7.5 percent) between FY 2015 and FY 2019 on average were above their workforce participation rate (6.1 percent). In FY 2019, the rate of separations of PWD in IT specialist (10.0 percent) and attorney (0.0 percent) positions were below their workforce participation rate (10.6 percent and 3.6 percent, respectively).</p>

4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

Refresher training and an in-house information session are planned for the second/third quarter FY 2020.

5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

Participation rates for PWD have gradually increased over the last five years, from 5.6 percent in FY 2015 to 9.1 percent in FY 2019.

Applicant flow rates for PWD in the agency's Entry-Level Examiner Program increased from 1.7 percent in FY 2015 to 2.1 percent in FY 2019. Applicant flow in FY 2019 (2.1 percent), resulted in a 3.6 percent external hiring rate of PWD.

The OCC retained 68.4 percent of its non-competitive Schedule A hires from FY 2015 and FY 2019, and converted 70.6 percent of its eligible Schedule A hires since FY 2015.

The SF-256 Resurvey Campaign in FY 2019 resulted in an increased participation rate of PWD in the workforce from 8.8 percent (334) to 9.0 percent (343).

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

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The OCC changed the focus of its barrier plan to concentrate on its MCO, and added activities that support these occupations. Planned activities are being executed, monitored, and evaluated.

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Trigger 2	Lower than expected participation rate (percentage) in career development programs (retention focus) for PWD compared with the relevant workforce participation rate.	
Barrier(s)	Lack of consistent attention to career development and retention activities and programs that specifically support PWD.	
Objective(s)	Increase the retention and the participation of PWD in the OCC's career development programs.	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
All Executive Committee Members; and Joyce Cofield, Executive Director, Office of Minority and Women Inclusion		Yes
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
Yes		Yes
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Reviewed Tables B1 and B14S2 to track the participation pattern across demographics profiles of PWD to determine if there is retention in their participation rates.
Complaint Data (Trends)	Yes	Reviewed complaints trend data to determine if PWD raised common issues.
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g.,	Yes	Reviewed the questions and responses that support the diversity and inclusion

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FEVS)		index for PWD in the FEVS.
Exit Interview Data	Yes	Reviewed responses from PWD to determine common reasons for leaving the agency, and their work experiences.
Focus Groups	Yes	Reviewed PWD interest group data results on their work experiences and opinions concerning the low retention of PWD in the OCC.
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Reviewed several federal and private sector reports and data from special interest groups to gain additional information on best practices and solutions for addressing the retention of PWD in the OCC's workforce.
Other (Please Describe)		

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/18	1. Encourage PWD to participate in management, leadership, and career development programs through ENGs and a variety of other communication venues throughout the agency.	Yes		09/30/19
09/30/18	2. Share developmental opportunities available throughout the agency with PWD through the ENGs.	Yes		09/30/19
09/30/18	3. Managers will encourage PWD to participate in developmental opportunities that support their career goals at the OCC.	Yes		09/30/19
09/30/19	4. Managers are strongly encouraged to manage the date the employee is eligible for conversion into the competitive	Yes		09/30/19

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	<p>service and work with their HR point of contact to plan for the conversion. Employees who were hired on a Schedule A permanent appointment are also strongly encouraged to include semi-annual discussions with their supervisor regarding conversion to permanent status in the competitive service when they discuss their Individual Development Plans (IDP) and performance. Send managers a quarterly email reminder regarding their employees' eligibility to convert to competitive service.</p>			
09/30/19	5. Hold annual self-identification campaigns during National Disability Employment Awareness Month.	Yes		09/30/19
09/30/19	<p>6. Implement pre-launch publicity activities (e.g., write FAQs and announcements, publicize in all OCC employee electronic media, host focus groups) to result in the launch of a disabilities ENG.</p> <p>a) Partner with Leadership, Executive and Organizational Development (LEOD) and Continuing Education (CE) to ensure concerns associated with PWD are considered in course development.</p> <p>b) Work with LEOD to develop more language that clearly includes characteristics of PWD.</p>	Yes		09/30/19
Fiscal Year	Accomplishments			
	The participation of PWD in career development programs has generally been below their relevant workforce participation rates between FY 2013 and FY 2019. However, the participation rates of PWD in career development			

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	<p>programs sponsored in FY 2019 were generally above their relevant workforce rates.</p> <p>In FY 2019, PWD met or exceeded their workforce participation in the Executive Coaching Program (12.0 percent vs. 6.1 percent) and internal career developmental courses (9.5 percent vs. 8.0 percent).</p>
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7. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

N/A

8. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

Participation rates for PWD have gradually increased over the last five years, from 5.6 percent in FY 2015 to 9.1 percent in FY 2019.

Applicant flow rates for PWD in the agency's Entry-Level Examiner Program increased from 1.7 percent in FY 2015 to 2.1 percent in FY 2019. Applicant flow in FY 2019 (2.1 percent) resulted in a 3.6 percent external hiring rate for PWD.

The OCC retained 68.4 percent of its non-competitive Schedule A hires from FY 2015 and FY 2019, and converted 70.6 percent of its eligible Schedule A hires since FY 2015.

The SF-256 Resurvey Campaign in FY 2019 resulted in an increased participation rate of PWD in the workforce from 8.8 percent (334) to 9.0 percent (343).

9. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

The OCC expanded the focus of its barrier plan to concentrate on the retention and development of its PWD. Planned activities are being executed, monitored, and evaluated.