Affirmative Action 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.

1. 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.

1. Cluster GS-1 to GS-10 (PWD) Answer: No
2. Cluster GS-11 to SES (PWD) Answer: No

2. 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) Answer: No
b. Cluster GS-11 to SES (PWTD) Answer: Yes

In FY 2025, the participation rate for PWTD in the GS-11 and above grade cluster (1.67%) fell below the established goal of 2.00%.

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

OCC provides annual updates on the established goals for PWD and PWTD in various briefings and trainings, allowing leadership to make informed decisions regarding PWD and PWTD.

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.

A. Plan to Provide Sufficient & Competent Staffing for the Disability Program

1. 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.

Answer: Yes

2. **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 PWTD	2			Shinu Shilesh Executive Director, OMWI Shinu.Shilesh@occ.treas.gov
Answering questions from the public about hiring authorities that take disability into account	4			Nina Tibbs Acting Director, Talent Acquisition nina.tibbs@occ.treas.gov
Processing reasonable accommodation requests from applicants and employees	1			LaToya Wilson RA Program Lead latoya.wilson@occ.treas.gov
Section 508 compliance	5			Rodney Kent IT Accessibility Program Manager Rodney.Kent@occ.treas.gov
Architectural Barriers Act compliance	30			Sheila Nematollahi-Rad Director for Workplace Services Sheila.Nematollahi-rad@occ.gov
Special emphasis program for PWD and PWTD	-	-	-	-

3. **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.**

Answer: Yes

In FY 2025, Treasury provided training sessions to the bureaus' staff on an as-needed basis regarding Part J and the use of the MD-715 workforce data tables. OCC participated in various meetings and training opportunities throughout this fiscal year to help educate attendees on various issues and topics related to disability.

OCC's reasonable accommodation coordinator (RAC) received refresher training on the RA tracking system that was deployed in FY 2020.

Treasury held weekly meetings with bureau RACs to provide guidance, discussion, and problem-solving for the implementation of Treasury's modified RA process.

Annually, all HR professionals are required to complete online courses related to veterans' employment, which includes disability components. This training, provided by the department, is mandated by EO 13518.

B. 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*.

Answer: Yes

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

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

HR business partners and RACs work closely with hiring managers to identify qualified PWD and PWTD by utilizing the Workforce Recruitment Program for College Students as a source for recruiting disabled students and graduating seniors, including disabled veterans.

2. **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.**

The use of nontraditional hiring methods such as Schedule A hiring authorities, is promoted and available for use, along with veterans appointment authorities to non-competitively appoint PWD/PWTD and veterans with a service-connected disability rating of 30% or more. The agency has incorporated the use of non-competitive hiring authorities under both Schedule A for individuals with disabilities and the 30% or More Disabled Veteran authority for recruiting PWD and PWTD in the permanent workforce. OCC Office of Human Capital forwards qualified applicant résumés from the Treasury Special Placement Program Coordinator (SPPC) to hiring officials for review and consideration.

3. **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 applicants utilize the Schedule A hiring authority for PWD, the process for eligibility and hire encompasses:

1) An application qualification review process conducted 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; and

2) Applicant referral – individuals deemed qualified are referred to the hiring manager on a Schedule A certificate of eligibility with the guidance on selection procedures. This includes 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 (VRA), etc.).

Alternatively, when individuals submit their résumés directly to the Treasury SPPC for vacant positions, the SPPC refers the résumés to the designated servicing HR specialist. The HR specialist reviews the résumés to determine qualifications. If qualifications and Schedule A eligibility are met, the résumés are then forwarded to the hiring manager for consideration, with guidance on selection procedures, including the application of veterans' preference, when applicable.

4. 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

All agency managers, supervisors, and selected HR professionals are required to complete veterans' employment online training provided through the Treasury's Integrated Talent Management system (ITM). Disability training, such as "Americans with Disabilities Act: An Overview for Managers," along with other hiring manager tools are also available through ITM.

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.

Treasury maintains contact with professional organizations, such as Wounded Warriors, to share information about opportunities, including career development tracks.

OCC holds periodic meetings with professional organizations to share the OCC's process for providing vacancy announcements and to share information about opportunities, including career development tracks.

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

In FY 2025, the PWTD participation rate for permanent new hires (0.00%) fell below the established goal of 2.00%.

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

When compared against the qualified applicant pool, triggers exist for PWD among permanent new hires for the following MCO: 0570.

Occupational Series	Qualified Applicant	New Hires
0570	2.86%	0.00%

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

When compared against the relevant applicant pool, triggers exist for PWD among qualified internal applicants for the following MCOs: 0570 and 0905.

Occupational Series	Relevant Applicant Pool	Qualified Internal Applicants
0570	9.23%	2.82%
0905	5.74%	0.00%

When compared against the relevant applicant pool, triggers exist for PWTD among qualified internal applicants for the following MCOs: 0570 and 0905.

Occupational Series	Relevant Applicant Pool	Qualified Internal Applicants
0570	1.53%	0.56%
0905	1.64%	0.00%

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 X No 0
b. Promotions for MCO (PWTD) Yes X No 0

When compared against the qualified applicant pool, triggers exist for PWD among permanent internal promotions in the following MCOs: 0570 and 0905.

Occupational Series	Qualified Applicant	Internal Promotions
0570	2.82%	0.00%
0905	0.00%	0.00%

When compared against the qualified applicant pool, triggers exist for PWTD among permanent internal promotions for the following MCO: 0570.

Occupational Series	Qualified Applicant	Internal Promotions
0570	0.56%	0.00%
0905	0.00%	0.00%

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.

The OCC's opportunities for advancement are accessible and open to all employees, including employees with disabilities. Developmental opportunities are broadly communicated to all employees through newsletter and intranet postings.

The OCC encourages individual development plans (IDP) for all employees; managers are reminded to consider permanently assigned PWD/PWTD for developmental opportunities as part of the IDP process. All developmental opportunity announcements are posted on the OCC's internal website.

B. Career Development Opportunities

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

The OCC does not have a formal career development program; however, the OCC offers various informal career development programs, such as the following programs.

- The EXCEL Program, sponsored by the Large Bank Supervision (LBS) department, provides bank examiners in pay band NB-V with opportunities to develop expertise in one of eight specialty areas.
- The Honors Attorney Program is designed to provide cross-training and developmental assignments to equip attorneys with legal skills and experiences across multiple legal practice 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.

2. **In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate.**

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship programs						
Fellowship programs						
Mentoring programs						
Coaching programs						
Training programs						
Detail programs						
Other career development programs						

3. Do triggers exist for <u>PWD</u> among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes," describe the trigger(s) in the text box.

a. Applicants (PWD) Yes 0 No X
b. Selections (PWD) Yes 0 No X

4. Do triggers exist for <u>PWTD</u> among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If "yes," describe the trigger(s) in the text box.

a. Applicants (PWTD) Yes 0 No X
b. Selections (PWTD) Yes 0 No X

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 X No 0

The inclusion rate for PWD (0.28%) and PWTD (0.00%) in time-off awards (11-20 hours), were below the inclusion rate for employees with no disabilities (0.43%).

The inclusion rate for PWD (0.28%) and PWTD (0.00%) in time-off awards (21-30 hours), were below the inclusion rate for employees with no disabilities (0.30%).

The inclusion rate for PWTD (0.00%) in time-off awards (31-40 hours), was below the inclusion rate for employees with no disabilities (0.26%).

The inclusion rate for PWD (71.10%) in cash awards ($500 and under), was below the inclusion rate for employees with no disabilities (80.25%).

The inclusion rates for PWD (33.99%) and PWTD (30.61%) in cash awards ($501-$999), were below the inclusion rates for employees with no disabilities (40.23%).

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 X	No 0	
b. Pay Increases (PWTD)	Yes X	No 0	

The inclusion rates for PWD (102.55%) and PWTD (116.33%) in performance-based pay increases were below the inclusion rate for employees with no disabilities (121.96%).

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

D. Promotions

1. **Does your agency have a trigger involving <u>PWD</u> among the <u>qualified *internal* applicants and/or selectees for promotions</u> to the senior grade levels? (The appropriate benchmarks are the <u>relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees</u>.) 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 X	No 0
ii. Internal Selections (PWD)	Yes X	No 0

c. Grade GS-14
   i. Qualified Internal Applicants (PWD) Yes X No 0
   ii. Internal Selections (PWD) Yes X No 0
d. Grade GS-13
   i. Qualified Internal Applicants (PWD) Yes X No 0
   ii. Internal Selections (PWD) Yes 0 No X

Triggers were identified for PWD who were selected in the GS-14 and GS-15 grades, as well as for the Qualified Internal Applicants in the GS-13 through SES grades.

	Relevant Applicant Pool	Qualified Internal Applicants	Internal Selections
SES	8.37%	0.00%	0.00%
Grade GS-15	10.51%	3.36%	0.00%
Grade GS-14	15.02%	5.26%	0.00%
Grade GS-13	18.57%	0.00%	0.00%

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 X No 0
   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 X No 0
d. Grade GS-13
   i. Qualified Internal Applicants (PWTD) Yes X No 0
   ii. Internal Selections (PWTD) Yes 0 No X

Triggers were identified for PWD who were selected in the GS-14 grade, as well as for the qualified internal applicants in the GS-13, GS-14, and SES grades.

	Relevant Applicant Pool	Qualified Internal Applicants	Internal Selections
SES	0.84%	0.00%	0.00%
Grade GS-15	1.42%	0.00%	0.00%
Grade GS-14	1.63%	2.63%	0.00%
Grade GS-13	4.29%	0.00%	0.00%

3. **Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWD</u> 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 X	No 0

Triggers were identified for PWD who were hired in the GS-13 grade.

	Qualified Applicants	New Hires
SES*	0.00%	0.00%
Grade GS-15*	0.00%	0.00%
Grade GS-14*	0.00%	0.00%
Grade GS-13	2.86%	0.00%

**There were no GS-14 through SES external vacancy announcements in FY 2025 that produced applicant flow data; therefore, this is not identified as a trigger.*

4. **Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWTD</u> 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

No triggers were identified for PWTD.

	Qualified Applicants	New Hires
SES*	0.00%	0.00%
Grade GS-15*	0.00%	0.00%
Grade GS-14*	0.00%	0.00%
Grade GS-13	0.00%	0.00%

**There were no GS-14 through SES external vacancy announcements in FY 2025 that produced applicant flow data; therefore, this is not identified as a trigger.*

5. **Does your agency have a trigger involving <u>PWD</u> 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 X	No 0
b. Managers		

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

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

Triggers were identified for PWD who were qualified for the supervisors, managers, and executives groups, as well as internal selections for executives.

	Relevant Applicant Pool	Qualified Internal Applicants	Internal Selections
Executives	10.13%	3.08%	0.00%
Managers	15.49%	0.00%	0.00%
Supervisors	13.08%	0.00%	0.00%

6. Does your agency have a trigger involving <u>PWTD</u> 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 X No 0
ii. Internal Selections (PWTD) Yes 0 No X

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

Triggers were identified for PWTD who were qualified for the supervisors, managers, and executives groups.

	Relevant Applicant Pool	Qualified Internal Applicants	Internal Selections
Executives	1.32%	0.00%	0.00%
Managers	1.98%	0.00%	0.00%
Supervisors	2.45%	0.00%	0.00%

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWD</u> 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

There were no management external vacancy announcements in FY 2025 that produced applicant flow data; therefore, this is not identified as a trigger.

8. **Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWTD</u> 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

There were no management external vacancy announcements in FY 2025 that produced applicant flow data; therefore, this is not identified as a trigger.

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 0 No X N/A 0

They are still within their two-year appointment which expires on the following dates for the four candidates hired.

- 03/10/2026
- 05/05/2026
- 06/02/2026
- 06/02/2026

2. **Using the inclusion rate as the benchmark, did the percentage of <u>PWD</u> among voluntary and involuntary separations exceed that of persons without disabilities? If "yes," describe the trigger below.**

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

The inclusion rate for involuntary PWD separations (1.98%) exceeds the inclusion rate for employees with no disabilities (0.30%).

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.**

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

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*.**

To ensure alignment with administration priorities, the OCC exit survey was unavailable for the majority of FY 2025.

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.**

The following address, located on the OCC public website, provides information and explains employee and applicant rights under Section 508 of the Rehabilitation Act: Accessibility | OCC.

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.**

The following address, located on the OCC public website, provides information and explains employee and applicant rights under Section 508 of the Architectural Barriers Act: Accessibility | OCC.

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.**

The OCC's OMWI collaborates with the Facilities Management office to conduct accessibility reviews as needed and when requested to ensure compliance with federal regulations. The OCC continued to work toward ensuring that 508 users had necessary information and communication technology to effectively perform their jobs.

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.)**

The average time frame (number of days) for processing reasonable accommodation requests during FY 2025 was 81 days.

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.**

The OCC has an effective disability program, supported by various policies, procedures, and practices. Mandatory training for new managers and supervisors includes responsibilities for providing reasonable accommodations. Reasonable accommodation guidance is provided via training courses, newsletters, and postings on its intranet websites.

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.

The OCC adopted the Treasury Department's PAS policy and procedures. The OCC has an effective system for providing PAS to employees with targeted disabilities, supported by policies, procedures, and practices. PAS training is included in employee orientation information for all newly hired and promoted managers.

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 X No 0 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

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.**

N/A

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 X No 0 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.**

N/A

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 0 No X

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

Yes 0 No 0 N/A X

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.**

Trigger 1	
Barrier(s)	
Objective(s)	

Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)		
Barrier Analysis Process Completed? (Yes or No)		**Barrier(s) Identified? (Yes or No)**		
Sources of Data	**Sources Reviewed? (Yes or No)**	**Identify Information Collected**		
Workforce Data Tables				
Complaint Data (Trends)				
Grievance Data (Trends)				
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)				
Climate Assessment Survey (e.g., FEVS)				
Exit Interview Data				
Focus Groups				
Interviews				
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)				
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)**
Fiscal Year	**Accomplishments**			

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

N/A

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

N/A

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.**

N/A