



The Office of the Comptroller of the Currency's

FY 2017

Affirmative Action Plan

for the

Recruitment, Hiring, Advancement, and

Retention of Persons with Disabilities

**Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of
Persons with Disabilities**

Section I: Efforts to Reach Regulatory Goals	1
Section II: Model Disability Program	2
A. Plan to Provide Sufficient & Competent Staffing for the Disability Program	2
B. Plan to Ensure Sufficient Funding for the Disability Program	3
Section III: Plan to Recruit and Hire Individuals with Disabilities	4
A. Plan to Identify Job Applicants with Disabilities	4
B. Plan to Establish Contacts with Disability Employment Organizations	5
C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING).....	6
Section IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities	7
A. Advancement Program Plan	7
B. Career Development Opportunities.....	8
C. Awards.....	9
D. Promotions.....	11
Section V: Plan to Improve Retention of Persons with Disabilities	17
A. Voluntary and Involuntary Separations	17
B. Accessibility of Technology and Facilities	18
C. Reasonable Accommodation Program.....	19
D. Personal Assistance Services Allowing Employees to Participate in the Workplace.....	19
Section VI: EEO Complaint and Findings Data	20
A. EEO Complaint Data Involving Harassment.....	20
B. EEO Complaint Data Involving Reasonable Accommodation	20
Section VII: Identification and Removal of Barriers	20

EEOC FORM
715-01 PART J

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.

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.

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

Source: B4-1

PWD GS-1 to GS-10: 10.6% vs 12.0% GS-11 to SES:¹ 7.9% vs 12.0%

Participation rates of PWD in both grade cluster groupings below the EEOC (501) goal of 12.0%.

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

Source: B4-1

PWTD GS-1 to GS-10: 2.7% vs 2.0% GS-11 to SES: 1.9% vs 2.0%

Participation rates of PWTD in GS-11 to SES grade cluster grouping below the EEOC (501) goal of 2.0%.

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

Numerical goals are communicated through a variety of methods, including the Agency balance scorecard, internal presentations and briefings, such as the annual MD-715 review,

¹ SES equivalent positions in the OCC are SLPs, NB-8, and NB-9.

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.

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.

Yes No

The OCC currently has a Plan (See Section VII) in place to address the need for a more systematic approach to the disability employment program. Recent leadership changes especially in Human Capital (HC) will allow us to review progress and take another look at how we might more effectively address staffing to better ensure a successful disability program.

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	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, Kelly.gauvin@occ.treas.gov
Section 508 Compliance	46	0	0	James Myers, Program Coordinator, Application & Production Transition Ops, Information Technology Services, James.Myers@occ.treas.gov <i>Major Groups w/508 Compliance Work:</i> Shawn Clark, Associate Deputy Comptroller for

				Continuing Education, Continuing Education, Office of Human Capital, Shawn.Clark@occ.treas.gov Bryan Hubbard, Deputy Comptroller for Public Affairs, Public Affairs, Bryan.Hubbard@occ.treas.gov
Architectural Barriers Act Compliance*	7*	1*	3*	Hans Heidenreich, Director for Workplace Services, Workplace Services, Administrative Operations, HEIDENREICHE@occ.treas.gov
Special Emphasis Program for PWD and PWTB	4	0	0	Joyce Cofield, Executive Director, Office of Minority and Women Inclusion, Office of Minority and Women Inclusion, Joyce.Cofield@occ.treas.gov

*NOTE: The OCC relies on Architectural Design contractors with a licensed Professional Engineer with ADA training to design and assist with the construction of OCC leased space. 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 stay atop of the latest Reasonable Accommodation (RA) regulations, case law, news, and issues.

All human resource (HR) professionals are required to complete online courses related to veteran's employment, which includes disability components. This training, provided by the Treasury Department, is mandated by Executive Order (EO) 13518. Also, HR representatives received RA refresher training, which also has a disability component.

The OCC will plan a more focused training effort for all HR Specialists, recruiters and managers involved in the agency disability program.

The Workplace Services team receives Contracting Officers Training for overseeing contractor performance.

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.

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

1. 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, i.e., 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, i.e., National Business and Disability Council (NB&DC) website for redirecting job seekers to the OCC, and posting the OCC's employment opportunities.
- 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 disabilities and using the Schedule A hiring authority.

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.

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. The Schedule A Program Manager (PM) has established a Communications Plan to advertise the WRP program to fill both permanent and temporary needs (due to the 2017 hiring freeze, however, the OCC did not hire WRP candidates). 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.

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 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 resumes to the designated servicing HR Specialist. The HR Specialist reviews the resumes to determine qualifications. If qualifications and Schedule A eligibility are met, the resumes 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

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

- Partner, lecture, and attend on-site presentations, and classroom visits in order to develop stronger relationships with college students and professors and with campus clubs and groups focusing on students with disabilities on college campuses.
- 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 X** No 0

Source: B8, Permanent hires

- PWD Hires: 6.3% vs 12.0%
- PWTD Hires: 1.3% vs 2.0%

Hiring rates for PWD and PWTD below EEOC 501 goals of 12.0% and 2.0%, respectively.

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 X** No 0

Source: B7* External applicants and hires; data for qualified and selected for each MCO.

Comparator: Selected vs. Qualified

	PWD	PWTD
• Examiner	1.6% vs 2.8%	1.2% vs 1.3%
• Attorney	0.0% vs 3.2%	0.0% vs 0.6%
• Economist	0.0% vs 5.1%	0.0% vs 4.2%

The trigger response is based on examiners occupying 66.1% of OCC positions and 70.0% of the FY 2017 hires.

*This data table is generated by Monster Analytics, and populated by CareerConnector. However, the data is incomplete, as it only contains information on the vacancies the OCC processed, not those processed by the Office of Personnel Management (OPM). Additionally, the system may have occasional inaccuracies issues.

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

Source: B9* Internal competitive applicants and hires; data for applicant and qualified for each MCO.

Comparator: Qualified vs. Applicant

	PWD	PWTD
• Examiner	2.5% vs 2.6%	1.4% vs 1.6%
• Attorney	0.0% vs 0.0%	0.0% vs 0.0%
• Economist	0.0% vs 12.5%	0.0% vs 12.5%

Percentage qualified for examiner and economist below applicant pool rates, but not for attorneys.

The trigger response is based on examiners occupying 66.1% of OCC positions and 70.0% of the FY 2017 hires. The qualified rates for PWD and PWTD in the examiner hiring process were near their applicant rates.

*This data table is generated by Monster Analytics, and populated by CareerConnector. However, the data is incomplete, as it only contains information on the vacancies the OCC processed, not those processed by OPM. Additionally, the system may have occasional inaccuracies issues.

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 |

Source: B9* Internal competitive applicants and hires; data for qualified and selected for each MCO.

Comparator: Selected vs. Qualified

	PWD	PWTD
• Examiner	1.9% vs 2.5%	0.7% vs 1.4%
• Attorney	0.0% vs 0.0%	0.0% vs 0.0%
• Economist	0.0% vs 0.0%	0.0% vs 0.0%

The trigger response is based on examiners occupying 66.1% of OCC positions and 70.0% of the FY 2017 hires. The selected rates for PWD and PWTD in the examiner hiring process were below their qualified rate.

*This data table is generated by Monster Analytics, and populated by CareerConnector. However, the data is incomplete, as it only contains information on the vacancies the OCC processed, not those processed by OPM. Additionally, the system may have occasional inaccuracies issues.

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 (ENGs) and 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 internet website postings. Opportunities also will be shared by ENG’s.

- Managers will be reminded to consider permanently assigned PWD/PWTD for development opportunities as part of their Individual Development Planning process. All vacancy announcements will be posted on the OCC internal careers website.

B. Career Development Opportunities

1. 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.
- 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.
- LeaderTRACK, is designed to build and maintain a pipeline of employees to meet future bank supervision leadership needs.
- Midsize & Community Banks Supervision (MCBS) Pre-commission Bank Examiners Career Forums provide information about bank examiner career opportunities and explain the Uniform Commission Examination (UCE) preparatory process.
- 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, 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 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.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate. **[Collection begins with the FY 2018 MD-715 report, which is due on February 28, 2019.]**

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						
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3. Do triggers exist for PWD 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 0
b. Selections (PWD)	Yes 0	No 0

NA. Not a reporting requirement for the FY 2017 reporting period.

4. Do triggers exist for PWTd 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 0
b. Selections (PWTd)	Yes 0	No 0

NA. Not a reporting requirement for the FY 2017 reporting period.

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

Source: B13, All awards; compared to the inclusion rate

A. Total cash award \$500 and under

- **No Dis.** – 61.4% (2178)
- **PWD** – 71.8% (275)
- **PWTd** – 54.4% (43)

B. Total cash award between \$501 and \$1500

- **No Dis.** – 69.6% (2470)
- **PWD** – 57.7% (221)
- **PWTd** – 60.8% (48)

C. Total cash award greater than \$1500

- **No Dis.** – 62.1% (2202)
- **PWD** – 36.0% (138)
- **PWTd** – 57.0% (45)

D. Total combined time-off awards

- **No Dis.** – 2.8% (98)
- **PWD** – 5.0% (19)
- **PWTd** – 6.3% (5)

The inclusion rate for PWD and PWTD fell below the inclusion rate for employees with no disability in two cash award categories: 1) between \$501 and \$1500, and 2) greater than \$1500.

Also, the inclusion rate for PWTD fell below the inclusion rate for employees with no disability for cash awards of \$500 and under.

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 0 | No X |

Source: B13, Filter by 892 Quality Increase and 885 Performance Award; compared to the inclusion rate

Total cash awards combined

- **No Dis.** – 19.2% (681)
- **PWD** – 11.2% (43)
- **PWTD** – 21.5% (17)

The inclusion rate for PWD fell below the inclusion rate for employees with no disability for total cash awards combined.

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 0 |
| b. Other Types of Recognition (PWTD) | Yes 0 | No 0 | N/A 0 |

NA

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 0	No X
ii. Internal Selections (PWD)	Yes 0	No X

b. Grade GS-15

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

c. Grade GS-14

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

d. Grade GS-13

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

Source: B11* Internal selections for SES; data for applicant, qualified, and selected. There was only NB-8 (SES equivalent) data; no GS-13 to GS-15 selections.

There were no PWD in the applicant pool.

*This data table is generated by Monster Analytics, and populated by CareerConnector. However, the data is incomplete, as it only contains information on the vacancies the OCC processed, not those processed by OPM. Additionally, the system may have occasional inaccuracies issues.

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 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0
b. Grade GS-15		
i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0
c. Grade GS-14		
i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0
d. Grade GS-13		
i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0

Source: B11* Internal selections for SES; data for applicant, qualified, and selected. There was only NB-8 (SES equivalent) data; no GS-13 to GS-15 selections.

There were no PWTD in the applicant pool.

*This data table is generated by Monster Analytics, and populated by CareerConnector. However, the data is incomplete, as it only contains information on the vacancies the OCC processed, not those processed by OPM. Additionally, the system may have occasional inaccuracies issues.

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 X	No 0
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

Source: B8S, New Hires by Occupational Series (expanded rows by grades; added manually all the hires by grades)

SES: 0.0% vs 12.0%

GS-15: 100.0% vs 12.0%

GS-14: 14.3% vs 12.0%

GS-13: 6.8% vs 12.0%

Hires into GS-14 and GS-15 positions were above the EEOC (501) goal of 12.0%.

4. 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 (PWT)	Yes X	No 0
b. New Hires to GS-15 (PWT)	Yes X	No 0
c. New Hires to GS-14 (PWT)	Yes 0	No X
d. New Hires to GS-13 (PWT)	Yes 0	No X

Source: B8S, New Hires by Occupational Series (expanded rows by grades; added manually all the hires by grades)

SES: 0.0% vs 2.0%

GS-15: 0.0% vs 2.0%

GS-14: 7.1% vs 2.0%

GS-13: 2.3% vs 2.0%

Hires into GS-13 and GS-14 positions were above the EEOC (501) goal of 2.0%.

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

Source: OCC HR Transaction DataMart; Promotion filter into supervisor positions

A. Comparator: Immediate feeder grade pool (Qualified) vs OCC-wide workforce participation (Applicant)

a. Executives (SES only)

6.1% GS-15 feeder grade participation rate vs 8.3% OCC-wide workforce participation rate

b. Supervisor (excludes SES)

9.7% OCC-wide GS-13 participation rate vs 8.3% OCC-wide workforce participation rate

The participation rate of PWD in the SES immediate feeder grade (GS-15) pool, below the OCC workforce participation rate.

The participation rate of PWD in the supervisor immediate feeder grade (GS-13) pool, above the OCC workforce participation rate.

B. Comparator: Promotion (Selection) vs. Immediate feeder grade pool (Qualified)

a. Executives (SES only)

0.0% promotion vs 6.1% OCC-wide GS-15 participation rate

b. Supervisor (excludes SES)

8.6% promotion vs 9.7% OCC-wide GS-13 participation rate

The promotion rate of PWD into the SES positions below their immediate feeder grade (GS-15) pool participation rate.

The participation rate of PWD into supervisor positions below their immediate feeder grade (GS-13) pool participation rate.

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 0 | No X |
| ii. Internal Selections (PWTD) | Yes X | No 0 |

b. Managers

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

c. Supervisors

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

Source: OCC HR Transaction DataMart; Promotion filter into supervisor positions

A. Comparator: Immediate feeder grade pool (Qualified) vs OCC-wide workforce participation (Applicant)

- a. Executives (SES only)
1.9% GS-15 participation rate vs 2.0% OCC-wide workforce participation
- b. Supervisor (excludes SES)
2.1% GS-13 participation rate vs 2.0% OCC-wide workforce participation

The participation rate of PWTB in the SES immediate feeder grade (GS-15) pool, near the OCC workforce participation rate.

The participation rate of PWTB in the supervisor immediate feeder grade (GS-13) pool, above the OCC workforce participation rate.

B. Comparator: Promotion (Selection) vs. Immediate feeder grade pool (Qualified)

- a. Executives (SES only)
0.0% promotion vs 1.9% GS-15 participation rate
- b. Supervisor (excludes SES)
5.7% promotion vs 2.1% GS-13 workforce participation

The promotion rate of PWTB into SES positions, below their immediate feeder grade (GS-15) participation pool rate.

The participation rate of PWTB into supervisor positions above their immediate feeder grade (GS-13) participation pool rate.

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 0
b. New Hires for Managers (PWD)	Yes 0	No 0
c. New Hires for Supervisors (PWD)	Yes 0	No 0

Source: OCC HR Transaction DataMart; External supervisor hires (accession filter)

Comparator: External supervisor hires vs 12% EEOC (501) goal

There were no PWD in the applicant pool of executives (SES only) or supervisors (excludes SES) external hires.

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

a. New Hires for Executives (PWTB)	Yes 0	No 0
b. New Hires for Managers (PWTB)	Yes 0	No 0
c. New Hires for Supervisors (PWTB)	Yes 0	No 0

Source: OCC HR Transaction DataMart; External supervisor hires (accession filter)

Comparator: External supervisor hires vs 2% EEOC (501) goal

There were no PWTB in the applicant pool of executives (SES only) or supervisors (excludes SES) external hires.

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 0 N/A 0

The OCC hired three employees under Schedule A in FY 2015, of which two separated and one was retained. The OCC converted one eligible Schedule A employee with a disability into competitive service after two years of satisfactory service.

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

Source: B14, Permanent separations

Comparator: Separation rate vs. Inclusion rate

The inclusion rate for PWD (6.5%) was below the inclusion rate of persons with no disability (7.0%) for voluntary separations.

The inclusion rate for PWD (0.3%) exceeded the inclusion rate of persons with no disability (0.2%) for involuntary separations.

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

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

Source: B14, Permanent separations

Comparator: Separation rate vs. Inclusion rate

The inclusion rate for PWTB (5.1%) was below the inclusion rate of persons with no disability (7.0%) for voluntary separations.

The inclusion rate for PWTB (0.0%) was below the inclusion rate of persons with no disability (0.2%) for involuntary separations.

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

Exit survey results indicate that commute/location was the primary reason most often cited by separating PWD in FY 2017.* All respondents indicated they would recommend the OCC/Treasury as a good place to work. Also, 80.0 percent of 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.

*There were only five exit survey respondents with disabilities; two retired.

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.

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

OCC Reasonable Accommodation Information Aid for Job Applicants:

Send requests for employee applicant accommodations for a disability to:
Kelly Gauvin, National Accommodation Coordinator, Workforce Relations and Performance Management

Office: (202) 649-6636
 Fax: (571) 293-4125

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.

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

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.)

10 business days or less

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 2017, 97.3 percent of RA requests were processed within the time frame set forth in the agency procedures. In addition, the OCC's Workforce Relations and Performance Management office in conjunction with its Administrative and Internal Law office has conducted numerous training courses for managers in FY 2017 (roughly eight separate sessions) as well as a recent agency-wide training on RA (October 2017). The OCC plans to conduct another agency-wide training session in January 2018 and expects to continue to conduct manager training sessions.

Also, 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 (i.e., fitness for duty, etc.) in FY 2017, and will continue to do so in FY 2018.

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.

OPM established the requirement for PAS to be implemented in January 2018. During FY 2018, first quarter, Treasury EEO established a PAS Working Group of which the OCC is a participant. The initial purpose of this working group is to establish and finalize a Statement of Work for procuring a Treasury-wide PAS contract. This contract will allow the OCC to establish a purchase order against the Treasury-wide base contract. While the PAS contract is being established, the PAS working group will create the PAS policy and procedures. In the interim, the OCC will follow existing RA policy and procedures to provide PAS.

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

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 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 X No 0 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.

As ordered in a Final Agency Decision issued without a hearing, these actions were completed: 10-day posting of a notice of the finding of discrimination, and two-hour training for three individuals identified in the Order. Disciplinary action was not considered for the two management officials responsible for the finding because both of them had retired before the decision. Two additional actions are pending a determination by the Treasury Department's Office of Civil Rights and Diversity: payment of compensatory damages and reimbursement of attorney's fees.

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.

Trigger 1	Low participation of PWD (8.3% below EEOC's (501) 12% Goal).			
Barrier(s)	The OCC lacks a comprehensive strategy for the outreach, recruitment, and retention of individuals with targeted disabilities that is consistently used.			
Objective(s)	Increase the representation of individuals with disabilities in the workforce, by creating a systematic approach to the disability employment program, with heightened emphasis on the recruitment, advancement, and retention of individuals with disabilities.			
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		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/17	1. Use the National Recruitment Office expertise to identify, recruit, and attract individuals with targeted disabilities.	Yes	NA	09/17
09/17	2. Explore networking websites to enhance outreach efforts to individuals with targeted disabilities. These sites include the <ul style="list-style-type: none"> • NB&DC's website for redirecting job seekers to the OCC and posting the OCC's employment opportunities • Student Veterans of America • Professional Diversity Network and LinkedIn Veterans network 	Yes	NA	09/17
09/17	3. Explore opportunities to establish relationships with organizations that support disabled veterans and people with targeted disabilities. These organizations include <ul style="list-style-type: none"> • George Mason University's Office of Military Services. • Local colleges, universities, and military and disability student offices. 	Yes	NA	09/17
09/17	4. Maximize the Pathways and HC Internship Program and Schedule A	Yes	NA	09/17

	authority to hire candidates with targeted disabilities.			
09/17	5. Use the WRP as a source for recruiting disabled students, including disabled veterans. Other planned activities include holding a forum to educate OCC managers on how to effectively use the WRP as a tool to recruit students with disabilities and establishing and maintaining relationships with WRP schools. Two OCC recruiters will serve as WRP recruiters in support of the WRP program.	Yes	NA	09/17
09/17	6. Provide disability training to recruiters, to include an overview of the OCC's RA program.	Yes	NA	09/17
09/17	7. Provide a workshop training session for managers and selecting officials on the benefits of employing individuals with disabilities and provide information on how to use special appointing authorities. Make the training available to new managers quarterly. The workshop training will also be posted on the agency's website as an online resource tool.	Yes	NA	09/17
09/17	8. Educate supervisors/managers through various training sessions via videoconference and/or brown-bag lunches, on hiring, retaining, and advancing individuals with disabilities/targeted disabilities for positions that they regularly recruit.	Yes	NA	09/17
09/17	9. Make use of temporary positions available through HC to recruit/target individuals with disabilities for a maximum two-year appointment into professional and technical positions. The individuals will be provided with the necessary accommodations, to ensure that they can successfully transfer into permanent critical occupations.	Yes	NA	09/17
09/18	10. Establishing Disability Program Co-Liaisons in OMWI and HC who will work closely together to execute the OCC's disability program efforts.	Yes	NA	09/18
Fiscal Year	Accomplishments			
2017	In FY 2017, the participation rate of individuals with disabilities increased to 8.3 percent from 6.2 percent in FY 2016, although it remained below the Treasury Department's goal of 10.0 percent and EEOC's 501 goal of			

	<p>12.0 percent. The OCC hired 15 individuals with disabilities in FY 2017, representing 6.3 percent of the hires, below the Treasury (10.0 percent) and EEOC 501 (12.0 percent) goals, their workforce participation rate (8.3 percent), and the hiring rate in FY 2016 (11.5 percent). Separations exceeded their workforce participation rate (8.5 percent vs. 8.3 percent).</p> <p>The OCC conducted an applicant flow data analysis of the entry-level bank examiner recruitment campaigns in 2017. The applicant pool rate for individuals with disabilities who self-identified in the applicant pool, on average, was 1.9 percent with a hiring rate of 2.0 percent. Although the applicant pool and hiring rate were below the 10.0 percent Treasury Department goal, the hiring rate exceeded the applicant pool.</p> <p>The participation rate of individuals with targeted disabilities increased significantly to 2.0 percent from 0.5 percent in FY 2016 and increased in total number from 20 employees to 79 employees. The significant increase of individuals with targeted disabilities in the OCC's workforce was due to the reclassification of disability codes (SF-256), the release of EEOC's new 501 regulation with new provisions toward goal achievement, and the resurveying of the OCC's workforce, which was an internal effort. Specifically, the OCC sponsored a "Voluntary Self-Identification of Disability" campaign in conjunction with the Treasury Department. Employees had the opportunity to self-identify their disabilities or serious health conditions in HR Connect, using the codes listed on the OPM SF-256. Employees were also invited to participate in lunch and learn sessions with OCC subject matter experts discussing support for disability employment at the agency. Information promoting the campaign was published in the agency's on-line newsletters "What's New at the OCC" and "What's New at HQ," and on its intranet site under various HC topics and subtopics.</p> <p>The OCC hired three individuals with targeted disabilities in FY 2017, representing 1.3 percent of the hires, below their workforce participation rate (2.0 percent), their separation rate (1.4 percent), and the hiring rate of FY 2016 (1.6 percent). Individuals with targeted disabilities separated below their workforce participation in FY 2017 (1.4 percent vs. 2.0 percent). Of the three targeted disability hires, one was a Schedule A hire. Of the OCC's staff members with targeted disabilities, 49.4 percent were bank examiners and 69.6 percent were in GS-13 equivalent and above grades.</p> <p>The OCC demonstrated its commitment to the recruitment, retention, and development of individuals with disabilities by partnering with a number of organizations to maximize outreach and recruitment potential.</p>
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4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

The OCC's ability to hire PWD and PWTB in the WRP and other student employment programs was significantly impacted by the federally mandated hiring freeze effective on January 22, 2017.

The HC office was restructured and had a change in leadership.

Also, the OCC is still addressing hiring auditing issues and having its non-examiner positions processed through OPM. This has slowed the recruitment/hiring/and on-boarding hiring process significantly.

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

- Increased gradually over the last five years the participation rates of PWD/PWTD.
- Encouraged employees to check and modify their disability status in HRConnect, which increased the OCC's disability workforce by 2.1 percentage points from the FY 2016 workforce participation rate of 6.2 percent to 8.3 percent in FY 2017.
- Converted one eligible Schedule A employee with a disability into a competitive service after two years of satisfactory service.
- Held Managers' Forums and published HR articles and other materials online that included information on non-competitive recruitment options (special hiring authorities). Four employees were hired using Schedule A hiring authority, which accounted for 1.7 percent of the total OCC hires.

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.

Establishing Disability Program Co-Liaisons in OMWI and HC who will work closely together to execute the OCC's disability program efforts.