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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	3535	7	3542

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

Agency Leadership	Name	Title
Head of Agency	Blake J. Paulson	Acting 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)	Carlos Hernandez	Hispanic Employee Network Group President	0570	NB-07	202-276-3739	Carlos.Hernandez@occ.treas.gov
Women's Program Manager (SEPM)	Terri Landa	Women's Network President/Associate Deputy Comptroller	0570	NB-07	202-649-6827	Terri.Landa@occ.treas.gov
Disability Program Manager (SEPM)	Diane Patterson	Disability Employee Network Group Interim President	570	NB-05	630-324-9521	Diane.Patterson@occ.treas.gov
Special Placement Program Coordinator (Individuals with Disabilities)	Harnet Reddy Natasha Schmidt	Selective Placement Program Coordinators/Human Resources Specialists (Recruitment)	0201	NB-05	202-649-5264 202-649-6662	Sam.Reddy@occ.treas.gov Natasha.Schmidt@occ.treas.gov
Reasonable Accommodation Program Manager	Kelly Battista	Reasonable Accommodation Coordinator/Human Resources Specialist	0201	NB-05	202-649-6636	Kelly.Battista@occ.treas.gov
Anti-Harassment Program Manager	Linda Medina	Anti-Harassment Program Manager/Human Resources Specialist	0201	NB-05	202-649-6638	Linda.Medina@occ.treas.gov
ADR Program Manager	Cheryl Lewis	Equal Employment Specialist	0260	NB-06	202-649-7175	Cheryl.Lewis@occ.treas.gov
Compliance Manager	N/A					
Principal MD-	Valerie	Program Analyst	0343	NB-05	202-649-	Valerie.Tucker@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
715 Preparer	Tucker	(EEO)			6460	
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, 2020, the OCC had 3,542 employees (3,535 permanent and 7 temporary). This

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number reflects a decline of 2.4 percent below the 3,629 employees (3,622 permanent and 7 temporary) in FY 2019. Generally, most minority 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 provides 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 2020 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 26, 2020.

Part E.4 - Executive Summary: Accomplishments

In 2020, the U.S. Office of Personnel Management (OPM) postponed the Federal Employee Viewpoint Survey (FEVS) administration due to the COVID-19 pandemic. On March 31, the survey [was delayed from May to July](#). On July 9, [OPM delayed the FEVS again](#), to start the week of September 14, 2020. The number of core items administered in 2020 was reduced from 72 to 38 and several COVID-19 items were added to assess agencies' response to the pandemic. Given the timing of the survey administration, the results are not expected until January 2021, at the earliest. 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. These rankings will also be delayed until 2021. The FEVS is designed to measure employees' perceptions of workplace conditions conducive to fostering employee engagement. The FEVS topics include direct supervision, work unit, leadership, agency, diversity, performance management, recognition, pay, work-life balance, and training and development. The 2020 FEVS will include the results of the Employee Engagement and Global Satisfaction indices but will not include New Inclusion Quotient results.

The OCC's award-winning training and development programs have been recognized for "harnessing human capital" through investment in employee development, the scope of its development program, and the close link between the OCC's development efforts and its strategic objectives. The OCC, through its Leadership Institute, has been recognized for its work on a competency model and curriculum for every level of leadership within the OCC, and for its innovative Leadership Foundations course, which supports the agency's vision for integrating leadership development into the OCC's culture.

OCC 2020 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 2019 report and modified in FY 2020:

1. Increasing the use of alternative dispute resolution (ADR) during the equal employment opportunity (EEO) pre-complaint process.
2. Increasing the participation and retention of Hispanics in the agency.
3. Increasing the participation of Hispanics in leadership positions.
4. Improving career progression and fostering a more inclusive environment for Hispanics.
5. Increasing the participation of female bank examiners.

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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6. Increasing the participation of females and minorities in supervisor roles and senior-level positions (SLP).
7. 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 2020, the OCC's EEO-ADR participation rate was 48.6 percent, which exceeded the Treasury Department's goal and was an increase from 32.1 percent in FY 2019. Of the 37 cases completed in FY 2020, 28 (75.7 percent) were eligible for EEO-ADR (18 participated and 10 declined) and 24.3 percent (9 cases of 37) were ineligible for EEO-ADR based on the OCC's ADR policy (one anonymous, three external applicants, one employment termination, and four 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 28 eligible cases in FY 2020, 18, or 64.3 percent, participated in EEO-ADR, compared with 45.0 percent in FY 2019 (of 20 eligible cases, 9 participated in EEO-ADR). In addition, the resolution rate in FY 2020 was 29.7 percent; 11 of 37 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. Dispute Prevention Week was not observed in FY 2020 because of the COVID-19 pandemic. Actions to improve the EEO-ADR participation rate are described in Part H.

2) Increasing the Participation and Retention of Hispanics in the Agency

The OCC continues its efforts to address the low participation rate of Hispanics in its workforce. In FY 2020, the Hispanic participation rate increased to 7.6 percent from 7.4 percent in FY 2019, an improvement from 5.1 percent in the OCC's FY 2005 baseline year. The OCC's Hispanic workforce participation rate (7.6 percent) remains below the NCLF rate of 10.0 percent, but at parity with the RCLF rate of 7.2 percent.

The overall workforce participation rate of Hispanics is influenced by their low participation in the OCC's non-major occupational groups. Hispanic non-major occupational groups participated below their workforce participation rate (7.8 percent vs. 10.0 percent NCLF rate), although there is recent improvement. For FY 2020, hires of Hispanics in non-major occupational groups were slightly below the NCLF (9.4 percent vs. 10.0 percent). Also, separations of Hispanics were below their workforce participation rate (5.1 percent vs. 7.8 percent).

In addition, the OCC's overall low participation rate of Hispanics is influenced by the need to build a stronger pipeline of Hispanic entry-level bank examiners, and the low retention of Hispanic bank examiners. Recently, there has been improvement in both of these areas. For FY 2020, Hispanic entry-level bank examiners were hired above their OCLF (8.4 percent vs. 6.8 percent). Also, the workforce participation rate of Hispanic female bank examiners remained stable at 3.2 percent in FY 2020, though below the OCLF rate of 3.7 percent.

The applicant flow analysis conducted on the entry-level bank examiner recruitment campaign in 2020 (Fall 2019 and Spring 2020) 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 in FY 2020 (as of August 25, 2020), to include entry-level examiner hires. There was no evidence of a

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statistically significant shift in the ethnic composition of the applicant pool as they progressed through the various stages of the decision process.

In FY 2020, the OCC established a Hispanic Recruitment Working Group with members from Hispanic Organization for Leadership and Advancement (HOLA), the Human Capital Recruitment Team, and the Office of Minority and Women Inclusion (OMWI) to review the Hispanic recruitment strategy. The group identified 50 campus student organizations for efforts to increase the Hispanic applicant pool for entry-level examiner positions. In addition, for FY 2021, the OCC plans to host a career webinar to amplify opportunities to entry-level Hispanic students. The working group will also focus on more strategic recruitment efforts for experienced examiners and non-examiners.

HOLA members served as recruiters/screeners and interview panelists during the entry-level bank examiner recruitment campaigns. HOLA members represented the agency at various career forums, job fairs, and networking events that included partnering with the OMWI and several other departments to host members of the New York City chapter of ASPIRA at the OCC. HOLA also published a blog, *Hablado con HOLA*, and spotlighted HOLA members in different leadership roles through its various communications, including on its website, blog, and emails to members.

The OCC will continue its focus in this area in FY 2021. Actions to increase the participation of Hispanics in the agency are described in Part I.

3) Increasing the Participation of Hispanics in Leadership Positions

In FY 2020, Hispanics in SLP (5.6 percent) and supervisor positions (6.9 percent) were below their workforce participation rate of 7.6 percent. However, the rate of supervisor positions increased by 1.9 percentage points from FY 2019. One Hispanic was promoted to a GS-15 equivalent position (NB-VII), and two were selected for managerial developmental opportunities in the agency's Law Department.

Applicant flow analysis was conducted on vacancies closed in FY 2020 by ethnicity and grade levels GS-13 through senior executive service (SES) equivalent grades. The applicant pool rates for Hispanics was 12.8 percent and the selection rate were 7.8 percent; the applicant rate was above the NCLF rate of 10.0 percent, while the selection rate was below. There was a statistical shift in the composition of Hispanics as they progressed through the decision process. Efforts are under way to better track and monitor trend data on the diversity of applicant pools and selections.

The OCC will continue its focus in this area in FY 2021. Actions to increase the participation of Hispanics in the agency are described in Part I.

4) Improving Career Progression and Fostering a More Inclusive Environment for Hispanics

In FY 2020, Hispanics participated in several management, leadership, and career developmental programs to improve their career progression and advancement in the agency. Hispanics participated in programs such as Leadership Exploration and Development (LEAD) Cohort II (11.5 percent), Executive Coaching (5.5 percent), and one Hispanic participated in the EXCEL I Program.

Hispanic examiners also participated in developmental opportunities as Training Team Leaders and Training Team Assistants (4.3 percent) to new entry-level ANBE hires in FY 2020. Two Hispanic examiners also had the opportunity to serve as ANBE recruiters, one served as a Writing Coach, and six participated in the Uniform Commission Examination (UCE) Evaluator Cadre.

The OCC continued to benefit from the activities of its Hispanic employee network group (ENG), HOLA. In FY 2020, HOLA established an ANBE Mentorship Cadre focused on new ANBE hires for their first year.

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The goal of the ANBE Mentorship Cadre is to enhance the early career experience and retention of Hispanic bank examiners. HOLA continues to offer its original platform of “Career Coaching,” in which members are paired with internal coaches and provided advice on available career paths, career progression, résumé writing, interviews, and training opportunities. In addition, HOLA continues to offer its “Speak to Lead” initiative, which provides HOLA members with real-time feedback on mock exit or board meeting presentations.

HOLA also partnered with the OMWI on the Hispanic Barrier Analysis Project and made presentations to several business units to continue to raise awareness of the need to increase Hispanic participation at the OCC. HOLA hosted four teleconferences under its “Speaker Series,” one of which was on the Hispanic Barrier Analysis Project and another on diversity and inclusion lessons from the private sector. In FY 2021, HOLA’s teleconferences will include panel discussions on career development opportunities. Additionally, in FY 2021 HOLA will host networking sessions for experienced bank examiners to share their thoughts on career progression.

One of HOLA’s former presidents and a current member of key HOLA committees was selected as the recipient of the OCC’s 2019 Honorary Award for Excellence in Diversity and Inclusion (awarded in 2020). She fostered collaboration among various committees and liaisons, as well as other stakeholders, including other ENG groups, and helped champion awareness within and outside of HOLA.

The OCC will continue its focus in this area in FY 2021. Actions to increase the participation of Hispanics in the agency are described in Part I.

5) Increasing the Participation of Female Bank Examiners

The OCC’s population of female bank examiners remained steady at 38.4 percent in FY 2020 and remains below the OCLF rate of 45.3 percent. The 30.5 percent hiring rate of female bank examiners was below the OCLF rate (45.3 percent). The OCC’s applicant flow data analysis of the 2020 entry-level recruitment campaign (Fall 2019 and Spring 2020) showed females represented 39.5 percent of the applicant pool and 30.9 percent of selections, both below the OCLF rate (45.3 percent). In addition, the OCC conducted a separate applicant flow analysis on examiner vacancies closed in FY 2020 (as of August 25, 2020), to include entry-level examiner selection. The analysis showed females made up 38.8 percent of the applicant pool and 43.3 percent of the selections; both were below the OCLF rate (45.3 percent). There was no evidence of a statistically significant shift in the gender composition of the applicant pool as they reached the selection process.

During FY 2020, female bank examiners separated at a rate (34.1 percent) below their workforce participation rate (38.4 percent) and their rate of separation in FY 2019 (43.8 percent), but above their hiring rate (30.5 percent) in the current fiscal year.

Of separating female bank examiners in FY 2020, resignations and transfers represented 58.7 percent; retirements accounted for 39.7 percent (a decrease of 12.1 percentage points from FY 2019); and removals/terminations comprised 1.6 percent. Of the resignations and transfers, 48.7 percent were new hires (six or fewer years of employment) and 51.4 percent were mid-career employees (not new hires and not eligible for retirement).

In FY 2020, the retirement eligibility pool (currently eligible and expected to obtain eligibility within five years) for female bank examiners was 28.1 percent (the lowest since FY 2010), compared with an average of 30.1 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.

Office morale, job stress, and travel requirements were the reasons most often cited by separating female

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bank examiners in the FY 2020 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, makeup time, credit hours, and telework arrangements. A majority of employees take advantage of these work arrangements: 85.0 percent flex, 69.8 percent vary their work schedules, and 96.6 percent telework, with 79.3 percent of employees teleworking either on a recurring or situational basis at least once a month during the year. However, since the COVID-19 pandemic began in March 2020, the entire agency operated in a maximum telework status through June 2020 and then converted to an extended telework status, which is the agency's current status.

The 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.

Typically, the OCC's Midsize and Community Bank Supervision (MCBS) department sponsors a half-day career forum for bank examiners in pay band NB-V positions who recently passed the UCE. However, due to the COVID-19 pandemic, no forums were held in FY 2020. The main focus of the forum is to provide 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.

In FY 2020, three UCE testing sessions were held. Forty-nine bank examiners successfully passed, of whom 36.7 percent (18) were female, down from 37.5 percent in FY 2019. In addition, 8.2 percent (4) were Hispanic, 18.4 percent (9) were Black, and 12.2 percent (6) were Asian, and 2.0 percent (1) were individuals with disabilities. All of these groups, except individuals with disabilities, passed the UCE in FY 2020 at rates near or greater than in FY 2019.

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 2020, 15 bank examiners were selected in EXCEL I classes: 26.7 percent (4) were female, 13.3 percent (2) were Asian, 13.3 percent (2) were Black, 6.7 percent (1) were Hispanic, and 20.0 percent (3) were individuals with disabilities.

The OCC has long benefited from the value provided by The Women's Network (TWN) employee resource group. In FY 2020, TWN supported the focused retention of female bank examiners through its mentoring circles that included topics such as "Career Exploration," "Uniform Commission Examination Preparation," and "Leadership." TWN also hosted a national teleconference on "Achieving Balance by Setting Limits and Making Tough Choices," published two newsletters, continued its Resource Group Mentoring Program with two resource groups—"Managing Your Career" and "Work Life Navigation"—organized a presentation on male allyship during which the presenters spoke from their book *Athena Rising*, and promoted TWN events in OCC-wide internal communications.

The OCC will continue its focus in this area in FY 2021. Actions to increase the participation of female bank examiners in the agency are described in Part I.

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

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In FY 2020, females participated at 44.3 percent in the OCC workforce and held 39.1 percent of supervisor positions and 31.5 percent of SLP, up from FY 2019 participation rates by 1.1 percentage points and 1.3 percentage points, respectively. Minorities participated in the workforce at 36.0 percent and held 28.2 percent of supervisor positions and 25.9 percent of SLP, up from FY 2019 participation rates by 1.2 percentage points in supervisor positions and down in SLP by 2.4 percentage points.

The agency's Comptroller recognizes and values the benefits of diversity in its management structure, so he helped lead senior-level discussions about how to improve the diversity of candidate slates for hiring and promotion decisions.

The OCC continued to offer 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 GS-14 and GS-15 equivalent (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 leaders as they prepare to seek executive opportunities.

In FY 2020, there were no new participants added to the Federal Executive Institute Residential Development Program, an external executive development course. The five participants who joined the program the previous year continued their leadership development. Of the five participants, 60.0 percent (3) were female 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 (TEI) provides programs on a variety of leadership competencies (e.g., communication, conflict management, diversity) that can help support continuous learning and development. The OCC extended these learning opportunities to employees in GS-13 and above equivalent grades (NB-V and above). In FY 2020, 156 employees participated in TEI programs—58.3 percent (91) were female and 27.6 percent (43) were minorities; 17.3 percent (27) were supervisors and 13.5 percent (21) were in GS-15 and above equivalent grades (NB-VII and above).

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. In FY 2020, 164 employees participated in the Executive Coaching Program—56.7 percent (93) were female and 31.1 percent (51) were minorities; 58.5 percent (96) were supervisors and 42.7 percent (70) were in SLP and feeder grades, GS-15 thru SES equivalent grades (NB-VII and above).

In FY 2020, the OCC completed the first phase of its redesign of the succession management process, the Leadership Competency Assessment. The phase identified individual development needs and focused on 14 key leadership competencies. Phase II of the redesign will continue into FY 2021 using feedback from Phase I.

The OCC will continue its focus in this area in FY 2021. Actions to address the disparity of minorities and females in supervisor positions and SLP are described in Part I.

7) Increasing the Participation of Individuals with Disabilities

In FY 2020, the workforce participation rate of individuals with disabilities increased slightly to 9.2 percent from 9.1 percent in FY 2019 but remained below the Equal Employment Opportunity Commission's (EEOC) goal of 12.0 percent. Individuals with disabilities separated (14.1 percent) in FY 2020 at rates above their participation in the workforce (9.2 percent) and above their hiring rate (10.7 percent).

An applicant flow analysis was conducted on job vacancies closed in FY 2020 (as of August 25, 2020) 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

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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 2020 (Fall 2019 and Spring 202) 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 information technology (IT) specialists. In FY 2020, MCO employees represented 80.4 percent of the agency's workforce collectively. Individuals with disabilities in MCO (7.1 percent) participated below the EEOC goal of 12.0 percent in FY 2020.

In FY 2020, individuals with disabilities in MCO were hired (8.0 percent) below the EEOC goal of 12.0 percent (all hires were bank examiners); and their separation rate (9.6 percent) was above their workforce participation rate (7.1 percent), but below their FY 2019 separation rate of 13.8 percent.

In May 2020, the OCC launched a new disability related ENG, the Differently Abled Workforce Network (DAWN), dedicated to fostering a workplace that values and respects individuals with different abilities. DAWN also serves as a source of support and information for OCC employees and their family members with disabilities. In FY 2020, DAWN made presentations to the OCC's Law Department to inform it of the group's mission and goals and collaborated with another ENG to present a teleconference on vulnerabilities during the COVID-19 pandemic. To promote education and communication, DAWN established a SharePoint site and internal web page where employees can view educational videos and articles describing inspirational stories and information on people with disabilities in the workplace. The web page also has reference material celebrating the 30th Anniversary of the Americans with Disabilities Act in July 2020.

The OCC's cross-functional Disability Working Group continued to manage the framework for the Disability Program and provided 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 2020, the working group expanded the Disability Barrier Plan with information received from the focus groups and 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) ensuring that all new course development activities and major revisions will be fully compliant when delivered, and (2) implementing new process standards for all course development and design work that include adherence to 508 standards and testing to verify compliance.

In addition, the OCC developed a new IT Accessibility (Section 508 and 504) Awareness Training, mandatory for all employees, to deliver accessibility and technology information required by federal law and provide awareness of existing assistive technologies that may assist employees with disabilities. The video gives a broad overview of the agency's compliance with Section 508 and 504 as well as real-world examples of OCC employees' experiences.

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 2020 Accomplishments

The OCC accomplished the following:

- Offered a virtual training course on unconscious bias titled "Unconscious Bias: From Insight to Action," in which 23 employees participated. Of these employees, 60.9 percent (14) were female;

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13.0 percent (3) were Black, 13.0 percent (3) were Asian, and 4.3 percent (1) were Hispanic, 4.3 percent (1) were individuals with disabilities, and 34.8 percent (8) were supervisors.

- Maintained the 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
 - ✓ utilized the Individual Development Plans (IDP) Dashboard to provide managers with quick access to IDP information all in one place. Nearly the entire workforce (96.4 percent) submitted IDPs. Of those who submitted IDPs, the following indicated on their IDP they aspire to the next leadership level: 40.2 percent were female, 17.5 percent were Blacks, 9.9 percent were Asian, 8.9 percent were Hispanic, 1.3 percent were from Small Ethnicity Race Indicator (ERI) groups, 8.9 percent were individuals with disabilities, and 12.0 percent were supervisors.
 - ✓ continued to offer the “Career Development Conversations” course to help facilitate career discussions between employees and managers, in which 39 employees participated. Of these employees, 66.7 percent (26) were female, 23.1 percent (9) were Black, 10.3 percent (4) were Hispanic, 2.6 percent (1) were Asian, 7.7 percent (3) were individuals with disabilities, and 48.7 percent (19) were supervisors.
 - ✓ worked on plans to launch an agency-wide formal mentoring program using the Integrated Talented Management System (ITM) in FY 2021. In addition to an open request for mentors, the OCC will partner with all ENGs to solicit mentors for the agency’s mentoring program.
- Continued to sponsor 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 2020, selections were made for the LEAD Cohort II Program. Of the 26 participants, 46.2 percent (12) were female, 19.2 percent (5) were Asian, 19.2 percent (5) were Black, 11.5 percent (3) were Hispanic, and 7.7 percent (2) were individuals with disabilities. All EEO groups participated above their relevant workforce participation rates, except 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 2020, 100 employees participated over three sessions: 100.0 percent (100) were female, 24.0 percent (24) were Black, 6.0 percent (6) were Hispanic, 3.0 percent (3) were from small ERI groups, 18.0 percent (18) were individuals with disabilities, and 15.0 percent (15) were supervisors.
- Awarded three minority females, in 2020, the “Excellence in Diversity and Inclusion Award” in recognition of their contributions in 2019 towards championing the principles of diversity, inclusion, and equal employment opportunity (EEO).
- Expanded the inaugural class of the High School Scholars Internship Program, to provide a six-week paid internship to 115 students to explore a variety of career paths at the OCC, gain an understanding of the financial services industry, and engage in enrichment activities on financial literacy and leadership fundamentals. Despite the challenges of the COVID-19 pandemic, and as

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many other agencies cancelled their summer programs, the OCC converted its program to a virtual experience to enable the agency to continue to provide interns with a positive, enriching experience.

- Established a Working Group on Diversity and Inclusion in the agency's Office of Management (OM) to analyze data and formulate actionable steps that can be taken by the OM senior leader team (SLT) members and their teams to promote diversity and inclusion within OM. The working group is led by an executive sponsor and consists of members across all OM units. Their recommended actions were delivered to the OM SLT at the end of FY 2020 for review and consideration for adoption.
- Sponsored a joint webcast between federal financial regulatory agencies' OMWI offices entitled "Beyond Words: Race, Work and Allyship—Amid the George Floyd Tragedy" to help support conversations around social justice and foster a better understanding across cultural groups and create a more inclusive work environment.

Part E.5 - Executive Summary: Planned Activities

In FY 2021, 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 and retention of Hispanics in the agency.
3. Increasing the participation of Hispanics in leadership positions.
4. Improving career progression and fostering a more inclusive environment for Hispanics.
5. Increasing the participation of female bank examiners.
6. Increasing the participation of females and minorities in supervisor roles and SLP.
7. 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 for Office of the Comptroller of the Currency (OCC)
(Insert Agency/Component Name above)

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

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

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

<div style="background-color: #cccccc; height: 25px; margin-bottom: 5px;"></div> Signature of Principal EEO Director/Official Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.	<div style="background-color: #cccccc; height: 25px; margin-bottom: 5px;"></div> Date
<div style="background-color: #cccccc; height: 25px; margin-bottom: 5px;"></div> Signature of Agency Head or Agency Head Designee	<div style="background-color: #cccccc; height: 25px; margin-bottom: 5px;"></div> 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	<p>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.</p> <p>In FY 2020, the OCC's participation rate increased from the previous year's rate of 32.1 percent to 48.6 percent (18 of 37) and exceeded the participation goal.</p>

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
11/01/2010	Increase ADR participation rate during the EEO pre-complaint process to meet the Treasury Department's goal.	09/30/2024	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	Planned Activities	Sufficient	Modified	Completion

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(mm/dd/yyyy)		Funding & Staffing? (Yes or No)	Date (mm/dd/yyyy)	Date (mm/dd/yyyy)
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		09/30/2020
08/30/2017	Conduct an ADR Managers Forum or brown-bag session to promote ADR as a resource for addressing workplace disputes.	Yes	09/30/2021	
09/30/2017	Continue to provide information on ADR to employees through the new hire orientation and other employee briefings.	Yes		09/30/2020
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		09/30/2020
09/30/2017	Continue to use and analyze feedback provided on ADR participant surveys.	Yes		09/30/2020
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	09/30/2021	
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		09/30/2020
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		09/30/2020
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		09/30/2020

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Report of Accomplishments

Fiscal Year	Accomplishments
FY 2020	<p>In FY 2020, the OCC experienced an increase in its EEO-ADR participation rate. This year's EEO-ADR participation rate was 48.6 percent (18 of 37), compared with 32.1 percent in FY 2019. Of the 37 total cases completed in FY 2020, 28 (75.7 percent) were eligible for EEO-ADR (18 participated and 10 declined). While we offer EEO-ADR to all who are eligible, 24.3 percent (9 out of 37) were ineligible for EEO-ADR based on the EEO-OCC's ADR policy (one anonymous, three external applicants, one termination and four 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 2020 would have been 64.3 percent (18 of 28 eligible cases participated in EEO-ADR). In addition, the resolution rate in FY 2020 was 29.7 percent; 11 of 37 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, and A8S	The representation of Hispanic female bank examiners and Hispanic employees 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). In FY 2020, Hispanic female bank examiners represented 3.2 percent of the OCC's workforce, compared with the 2010 OCLF rate of 3.7 percent. Hispanics in non-major occupational groups represented 7.8 percent of the workforce, compared with the 2010 NCLF rate of 10.0 percent.

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	
Native Hawaiian or Other Pacific Islander Females	

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EEO Group
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, and A8S 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)	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.

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Reviewed several federal and private sector reports and reports of 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 data on Hispanic students with conferred B.A. and M.A. business degrees to assess the diversity sufficiency of educational sourcing pools.</p> <p>Conducted a 17-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
<p>The low workforce participation rate of Hispanics is influenced by their low participation in the OCC's bank examiner (females) and non-major occupational groups, and the low retention of entry-level examiners until years seven through 10, when the gap narrowed with non-Hispanics. Our analysis indicates that Hispanic female bank examiners were hired at levels below the OCLF rates. Hispanics in non-major occupational groups were also hired at levels below the NCLF rates.</p>

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Objective(s) and Dates for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Increase the participation of Hispanic entry-level bank examiners and Hispanics in non-major occupational groups, e.g., contract specialists, HR specialists, and accountants.	10/01/2004	09/30/2024	Yes	06/30/2020	
Improve the retention of Hispanic entry-level bank examiners year 1.	10/01/2004	09/30/2024	Yes	06/30/2020	

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.		09/30/20
09/30/18	Analyze effectiveness of the Hispanic Recruitment Strategy to recruit Hispanics in entry-level bank examiner positions and non-major occupational groups, e.g., contract specialists, HR specialists, and accountants.	06/30/20	09/30/20
09/30/18	Continue to further develop strong relationships with college campuses and with organizations, associations, clubs, and groups on campus that have Hispanic students, such as Beta Alpha Psi (BAP) and Association of Latino Professionals for		09/30/20

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Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
	America (ALPFA).		
09/30/18	Work with district recruitment specialists to ensure there are targeted programs for attracting Hispanic talent to the OCC.		09/30/20
09/30/18	Participate in the ALPFA national and regional conferences and meetings.		09/30/20
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.		09/30/20
09/30/18	Continue to explore ways to expand applicant pools for non-major occupational positions (e.g., Hispanic-populated job fairs, internships, Hispanic associations).		09/30/20
09/30/18	Recruit students using the financial internship program for Midsize and Community Bank Supervision (MCBS).		09/30/20
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.		09/30/20
09/30/18	HOLA members will participate in OCC outreach at the annual conferences of Latin American organizations, including League of United Latin American Citizens (LULAC) and UnidosUS, formerly La Raza.	09/30/21	
09/30/18	To strengthen retention efforts, HOLA will participate in OCC employee network group events to provide employees with opportunities for networking and learn more about HOLA's goals, programs, and activities.		09/30/20
09/30/19	Extend a focused full-time, temporary Diversity and Inclusion Program Manager role to FY 2021 that will address the identified deficiencies by planning and implementing activities to improve		09/30/20

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Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
	hiring and employment practices and ensure the full participation of Hispanics in the OCC's workforce.		
06/30/20	Launch a Recruitment Working Group, with members of the Recruitment team, HOLA, and OMWI, to collaborate on recruitment efforts for entry-level examiners and non-major occupational groups recruitment.		09/30/20
06/30/20	Implement action items in the Hispanic Barrier Analysis Action Plan related to the focus areas on recruitment and retention, that are applicable.		09/30/20

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2020	<p>In FY 2020, the low participation rate of Hispanic employees remained a priority for the OCC. The overall percentage of Hispanics increased to 7.6 percent in FY 2020 from 7.4 percent in FY 2019, a 2.5 percentage point improvement over the FY 2005 rate of 5.1 percent. The OCC's overall Hispanic participation rate, however, remains significantly below the 2010 NCLF rate of 10.0 percent. When compared with the relevant CLF (RCLF) rate of 7.2 percent, Hispanic participation overall is at parity.</p> <p>The low participation rate of Hispanics in non-major occupational groups continued to be a major influence in the overall disparity of Hispanics in the agency. The percentage of Hispanics in non-major occupational groups increased to 7.8 percent in FY 2020 from 7.5 percent in FY 2019, although rates remain below the 2010 NCLF rate of 10.0 percent. In FY 2020, Hispanic males in these groups participated at 3.1 percent in the workforce, compared with 5.2 percent in the NCLF, a 0.2 percentage point increase from FY 2019. Hispanic females in these groups participated at 4.6 percent in the workforce, compared with 4.8 percent in the NCLF, remaining stable from FY 2019.</p> <p>The hiring rate of Hispanics in non-major occupational groups was near the NCLF rate (9.4 percent vs. 10.0 percent) and below the FY 2019 rate of 12.0 percent. There were no Hispanic attorney or economist hires in FY 2020; however, hires for bank examiners (8.4 percent) exceeded their OCLF (6.8 percent).</p> <p>Between FY 2009 and FY 2019, the hiring of Hispanics as human resources (HR) specialists and contract specialists has been far below their OCLF—5.3 percent vs. 9.5 percent and (0.0 percent vs. 7.1 percent, respectively. In FY 2020, no Hispanic HR specialists were hired, and one</p>

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<p align="center">FY 2020</p>	<p>Hispanic male contract specialist was hired.</p> <p>In FY 2020, the participation of Hispanic HR specialists was 5.1 percent, below the OCLF (9.5 percent), and the FY 2019 percent of 7.1 percent. The participation of Hispanic contract specialists (5.6 percent) was also below their OCLF of 7.1 percent, but an improvement from the previous absence in the workforce in FY 2019 (0.0 percent).</p> <p>In FY 2020, separations were below the workforce participation rate (5.1 percent vs. 7.8 percent) for Hispanics in non-major occupational groups, below the FY 2019 separation rate of 8.0 percent.</p> <p>The OCC's overall low participation rate of Hispanics is also influenced by the low retention of Hispanic bank examiners and the need to build a stronger pipeline of Hispanic entry-level bank examiners.</p> <p>The Hispanic Barrier Analysis (HBA) Project completed in FY 2020 reflected the Entry-Level Bank Examiner Recruitment Program continuing to be a significant source for Hispanic hiring at the aggregate level at the OCC, although this was not the case in each of the agency's four districts. More strategic recruitment strategies are under way to address the differences. In FY 2020, 8.4 percent (9) of the entry-level bank examiners self-identified as Hispanic overall, above the 6.8 percent OCLF, but below the FY 2019 rate of 13.1 percent.</p> <p>In FY 2020, 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 (4.3 percent vs. 3.1 percent), above their FY 2019 rate of 4.1 percent. Over the last fiscal year, the percentage of Hispanic bank examiners increased slightly to 7.4 percent from 7.3 percent in FY 2019.</p> <p>Hispanic bank examiners were hired at a rate greater than their OCLF rate (8.4 percent vs. 6.8 percent). Separations were below their workforce participation rate for Hispanic bank examiners (5.6 percent vs. 7.4 percent), and below the separation rate (8.9 percent) in FY 2019.</p> <p>The OCC conducted an applicant flow data analysis of the entry-level bank examiner recruitment campaign in 2020 (Fall 2019 and Spring 2020). The applicant pool rate for Hispanics who self-identified was 19.7 percent, with a selection rate of 10.9 percent; the applicant pool and selection rate exceeded the Hispanic examiner OCLF rate of 6.8 percent.</p> <p>The OCC conducted a separate applicant flow data analysis on job vacancies closed in FY 2020 (as of August 25, 2020), and made up of entry-level examiner positions, by ethnicity (Hispanic and non-Hispanic). The applicant pool rate for Hispanics who self-identified was 13.0 percent with a selection rate of 8.9 percent; the applicant pool rate exceeded the NCLF rate of 10.0 percent, while the selection rate fell below. 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 continues to be a marked improvement from significantly low applicant pool rates of the last few years. The OCC will continue to monitor the applicant pools and the impact of hiring processes.</p>
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FY 2020	<p>As a result of the HBA, a Hispanic Recruitment Working Group was established with members from HOLA, the Human Capital Recruitment Team, and OMWI to collaborate on a sustainable and formal plan to improve and increase outreach to colleges and universities with the goal of maximizing the pool of Hispanic applicants. The working group is identifying Hispanic recruiters to participate in outreach events and soliciting greater participation among HOLA members to become trained recruiters. In addition, there were 50 campus student organizations identified to increase the Hispanic applicant pool for entry-level examiner positions. A recruitment webinar for Hispanic new hires is planned for FY 2021 to amplify and highlight OCC opportunities.</p> <p>In FY 2020, a total of 59 employees were identified as having received training and were qualified as training team leaders (TTL) and training team assistants (TTA), of which 3.4 percent (2) were Hispanic. From the total qualified pool, 47 employees served as TTL and TTA to 107 new entry-level assistant national bank examiner (ANBE) employees in FY 2020, of which 4.3 percent (2) were Hispanic. The entry-level examiner recruitment program was also used to mentor and prepare examiners for the Uniform Commission Examination (UCE). Hispanics passed the UCE (8.2 percent) at rates below their average availability pool rate in the bank examiner workforce (10.4 percent).</p> <p>Hispanic ANBEs who were in their first two years of employment by the end of the fiscal year received awards and recognition (12.0 percent) at rates exceeding their average participation in the ANBE workforce (9.8 percent).</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	A4 and A7	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 and A7 to track the participation pattern across demographic 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 the 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)
Yes	Yes

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
<p>The low workforce participation rate of Hispanics in GS-13 through SES equivalent positions is influenced by slow career progression, limited promotions and advancement opportunities, and need for a formalized agency-wide program for mentors, sponsors, or coaches.</p> <p>Examiners and non-examiners identified limited opportunities for career advancement and progression as the biggest challenge working for the OCC. The main reason examiners gave for leaving was for higher compensation; for non-examiners it was for more meaningful work or having more impact.</p>

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Objective(s) and Dates for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Increase participation of Hispanics in Manager, Deputy Comptroller (DC), and Executive Committee (EC) Levels	06/30/2020	09/30/2024	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)
06/30/20	Integrate diversity into succession planning and maximize every opportunity to promote or hire Hispanics to Manager, DC, and EC levels.		09/30/20
06/30/20	Establish the HOLA Assistant National Bank Examiner (ANBE) Mentoring Cadre.		09/30/20
06/30/20	Monitor trends in new and existing opportunities and temporary promotions.		09/30/20
09/30/22	Formalize the OCC's Mentoring Program.		

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Report of Accomplishments

Fiscal Year	Accomplishments
FY 2020	<p>The Hispanic Barrier Analysis (HBA) Project was completed in FY 2020 and identified low participation of Hispanics in supervisory and SES/senior-level positions (SLP²). High-level findings showed the following between 2003 and 2018:</p> <ul style="list-style-type: none"> • The average promotion rate for Hispanic non-examiners from GS-14 and GS-15 equivalent positions³ was low at best and in many cases absent. • There was only one SES equivalent (NB-VIII) Hispanic examiner out of a total of 25 NB-VIIIs. • There were only two Hispanics who were promoted to a SES equivalent position (NB-VIII). <p>In FY 2020, the percentage of Hispanics in SLP was 5.6 percent and the percentage in supervisor positions was 6.9 percent, below their workforce participation rate of 7.6 percent. The percentage of Hispanics in SLPs remained stable, and supervisor positions increased by 1.9 percentage points from FY 2019. Hispanics in GS-15⁴ equivalent positions were also below their workforce participation rate (5.6 percent vs. 7.6 percent).</p> <p>One (5.9 percent) Hispanic female in a GS-15 equivalent position was promoted in FY 2020. However, no Hispanics were hired at the GS-15 and above equivalent levels, and none were promoted into SLP.</p> <p>Two (8.3 percent) Hispanic employees were temporarily promoted to supervisory GS-15 equivalent positions from GS-14 equivalent positions.</p> <p>The OCC also conducted an applicant flow analysis on vacancies closed in FY 2020 (as of August 25, 2020), by ethnicity and grade levels, GS-13 through SES equivalent grades (NB-V through NB-IX). The applicant pool rate for Hispanics in GS-13 through SES equivalent grades who self-identified was 12.8 percent and the selection rate was 7.8 percent; the applicant pool was above the NCLF rate of 10.0 percent while the selection rate fell below. There was a statistically significant shift in the composition of Hispanics in GS-13 through SES equivalent grades as they progressed through the various stages of the decision process.</p> <p>In FY 2020, six Hispanics applied for managerial developmental opportunities (GS-14 and GS-15 equivalent) in the agency's Law Department. Three were nominated by their leadership for further consideration and two were selected.</p>

² SES grades are equivalent to NB-VIII and NB-IX grades.

³ GS-14 and GS-15 grades are equivalent to NB-VI and NB-VII grades.

⁴ GS-15 grade is equivalent to NB-VII grade.

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FY 2020	<p>In FY 2020, HOLA established an ANBE Mentorship Cadre for first-year entry-level Hispanic new examiner hires. The goal of the ANBE Mentorship Cadre is to welcome and help new hires navigate the OCC, enhance their early career experiences and our ability to retain them, and expand our future pipeline. Through this Cadre, HOLA sought to help address the retention issues identified in the HBA.</p> <p>HOLA also partnered with the OCC's other employee network groups and its Leadership, Executive, and Organizational Development department to provide mentors to all new hires, starting with the FY 2020 entry-level examiner hires. The Cadre mentors are an additional resource along with their host assistant deputy comptroller and training team leaders. Of the total of 33 mentors in the Cadre, 10 mentors were assigned to new ANBE hires, of whom six were from HOLA.</p> <p>Plans are under way to launch an agency-wide formal mentoring program using the Integrated Talent Management Learning System. The OCC will solicit volunteers for mentor from all lines of business and will partner with the ENG's to identify a group to pilot the program by early FY 2022.</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	A4 and A7	Promotion rates of Hispanics in GS-13 through senior executive service (SES) equivalent positions (NB-V through NB-IX) in the OCC are lower than expected when compared with their relevant participation in the workforce.

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 and A7 to track the participation pattern across demographic 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 Federal Employee Viewpoint Survey (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 employees 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)
Yes	Yes

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
<p>The low promotion rate of Hispanics in GS-13 through SES equivalent positions is influenced by slow career progress, limited promotions and advancement opportunities, and lack of a formalized agency-wide program for providing mentors, sponsors, or coaches.</p> <p>Our analysis indicates that it takes Hispanic examiners 1.4 years longer on average to achieve promotions from GS-13 to GS-14 equivalent positions (NB-V and NB-VI). The average promotion rate across the agency from GS-14 to GS-15 equivalent positions (NB-VI and NB-VII) for Hispanic examiners is mixed and for non-examiners is low at best and in many cases absent.</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)
Improve career progression for Hispanics in GS-13 thru SES equivalent positions.	06/30/2020	09/30/2024	Yes		
Foster a more inclusive environment for all Hispanics	06/30/2020	09/30/2024	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	Invite OCC speakers to HOLA annual and quarterly calls to discuss OCC career opportunities.		09/30/20
09/30/18	Continue to direct OCC job opportunities and postings to the HOLA membership.		09/30/20
09/30/18	Continue to promote Hispanic participation in management, leadership, and career development programs.		09/30/20
09/30/18	HOLA members will participate in OCC outreach at the annual conferences of Latin American organizations, including LULAC and UnidosUS, formerly La Raza.	09/30/21	
06/30/20	Increase pools of qualified Hispanic candidates to successfully compete for leadership positions and developmental opportunities.		09/30/20

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Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
06/30/20	Utilize the individual development plan (IDP) process to ensure managers/supervisors have career development discussions with Hispanic employees.		09/30/20
06/30/20	Use award system and merit bonuses to incentivize proactive support of diversity and inclusion.		09/30/20
06/30/20	Provide more soft skills training around inclusive work culture and unconscious bias training for all employees.		09/30/20
06/30/20	Continue to visibly support a culture of engagement and inclusion at all levels of the OCC.		09/30/20
06/30/20	Implement action items in the Hispanic Barrier Analysis Action Plan related to the focus areas on fostering a more inclusive environment.		09/30/20

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2020	<p>The slow career progression for Hispanics in GS-13 thru SES⁵ equivalent positions and the need to foster a more inclusive environment for all Hispanics were identified in the Hispanic Barrier Analysis (HBA) that was completed in FY 2020. High-level findings showed the following between 2003 and 2018:</p> <ul style="list-style-type: none"> • Promotion from GS-13 and GS-14⁶ equivalent positions takes Hispanics examiners 1.4 years longer on average to achieve. Results are mixed at the GS-15⁷ equivalent 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. • Hispanic pre-commissioned bank examiners take 0.7 years longer on average to get to the GS-13 equivalent level. • The average promotion rate for Hispanic non-examiners in GS-13 to GS-14 equivalent positions is almost twice their participation rate. • Hispanic employees relocate/change duty stations as much as their workforce participation rate, and there is no evidence to support the hypothesis that Hispanics relocate less than other racial groups.

⁵ GS-13 through SES grades are equivalent to NB-V through NB-IX grades.

⁶ GS-13 and GS-14 grades are equivalent to NB-V to NB-VI grades.

⁷ GS-15 grades are equivalent to NB-VII grades.

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FY 2020	<p>In FY 2020, Hispanics were promoted to GS-13 equivalent positions at 8.5 percent, above their workforce participation rate (7.6 percent). This was primarily driven by their continued high promotion rate in non-examiner positions. When observed by examiner (7.7 percent) and non-examiner (14.3 percent) status, Hispanics were promoted to GS-13 equivalent positions at higher percentages than their workforce participation rate (7.6 percent).</p> <p>The OCC has promoted the full engagement of Hispanic participation in management, leadership, and career development programs. Members of the OCC’s Hispanic staff (7.9 percent) participated in several formal and informal career development programs and training courses that provided learning and continuous growth opportunities in FY 2020.</p> <p>Hispanic employees (7.2 percent) participated in agency-sponsored leadership training courses designed for managers, supervisors, and employees. Hispanic employees (5.5 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> <p>The OCC offers a Leadership Practice Inventory 360 Degree Assessment to solicit feedback for aspiring executives to develop and improve communication and working relationships across the OCC. This tool is offered as part of two Leadership courses—“Leader Within: Awakening Authentic Leadership” and “Leading and Engaging”—in which Hispanics participated (10.3 percent).</p> <p>Hispanic employees (6.4 percent) in GS-13 and above equivalent positions participated in courses through the Treasury Executive Institute, which provides programs on a variety of leadership competencies (communication, conflict, diversity, etc.) that can help support continuous learning and development.</p> <p>Also, Hispanic employees (11.5 percent) were selected to receive robust training and development in the OCC’s Leadership Exploration and Development (LEAD) Cohort II Program in FY 2020. The program is designed to develop leadership competencies at the team leader and/or manager level and foster a broader, enterprise perspective.</p> <p>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. 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 2020, one Hispanic bank examiner (6.7 percent) was selected.</p> <p>The agency’s Midsize and Community Bank Supervision (MCBS) department sponsors developmental opportunities as Training Team Leaders (TTL) and Training Team Assistants (TTA) at the GS-13 and GS-14 equivalent grade levels for new entry-level assistant national bank examiner (ANBE) hires. The assignment typically lasts six to eight months, and selected employees take the “Leading Training Teams” training course</p>
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FY 2020	<p>in advance of the assignment. In FY 2020, of a total of 59 employees identified as having received training and qualified as TTL and TTA, 3.4 percent were Hispanic. From the total qualified pool, 47 employees served as TTL and TTA to 107 new ANBE hires in FY 2020, of whom 4.3 percent were Hispanic.</p> <p>Two Hispanics applied and were selected for ANBE recruiter roles (approximately GS-12 and GS-14 equivalent grade levels). Hispanics also participated in the first group of examiner writing coaches (GS-13 through GS-15 equivalent) for ANBE new hires. Two Hispanics applied and one was selected as a writing coach. The Uniform Commission Examination (UCE) Evaluator Cadre was another assignment posted on the agency's Opportunities Board where Hispanics had the opportunity to leverage their skills, including leadership, communication, and teamwork. Seven Hispanics applied and six were selected for the UCE Evaluator Cadre.</p> <p>In FY 2020, the Honors Attorney Program continued developmental opportunities for the FY 2018 hires. Of the eight new hires, six were law clerks, and four (66.7 percent) were Hispanic. The program is designed to provide cross-training and developmental assignments to equip incoming 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 or FY 2020.</p> <p>Several HOLA members were selected for new positions and detail opportunities and supported various OCC initiatives by volunteering in leadership roles, including the Comptroller's Rotation (11.1 percent) and LEAD Cohort II (11.5 percent), and a HOLA member served in a leadership role with the agency's High School Scholars Internship Program.</p> <p>HOLA also continued to offer two programs to help its members with their career development—Speak to Lead and Career Coaching. HOLA's "Speak to Lead" Program provides members with real-time feedback on mock exit interviews, board meetings, and presentations. The independent panel joins the participant(s) via Skype. In FY 2020, there were 14 speech coaches and four participants. The Career Coaching Program is a specialized opportunity to assist members in the development and potential promotion of their careers. Members are paired with internal coaches and provided advice on available career paths, career progression, résumé writing, interviews, and training opportunities. In FY 2020, there were 26 coaches and 13 mentee participants.</p> <p>HOLA also hosted a teleconference under its Speaker Series for its members on best practices for effective interviews in a virtual setting. Over 200 employees participated.</p> <p>The HBA project identified the benefits of incorporating more soft skills training to supervisors and managers and the value of supervisors having career development discussions with their Hispanic employees. In FY 2020, Hispanics participated in various unconscious bias (4.7 percent) and cultural awareness (10.0 percent) training courses. The full workforce of Hispanics (7.6 percent) submitted IDPs and participated in career development discussions with their managers. Of those, 8.9 percent indicated on their IDPs that they aspired to the next leadership level. In</p>
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FY 2020	<p>addition, 10.3 percent of participants in the “Career Development Conversations” training course were Hispanic.</p> <p>The OCC also continued to support a culture of engagement and inclusion at all levels of the agency and foster a more inclusive environment for all Hispanics. For the past three years, FEVS Employee Engagement Index (EEI) scores for Hispanics have remained aligned with the overall agency scores. In 2019, the EEI was 74.0 percent for Hispanics and 72.0 percent for the OCC. The three-year trend is similar for the New Inclusion Quotient; the score for Hispanics in 2019 was 68.0 percent, and for the OCC overall it was 68.0 percent. The Global Satisfaction Index for Hispanics was 68.0 percent, and for the OCC it was 69.0 percent. The 2020 FEVS results will not be available until January 2021.</p> <p>To raise awareness of HOLA's mission, key organizational changes, and opportunities with Hispanic recruitment and retention, HOLA gave presentations to three district senior management teams in FY 2020. HOLA plans to continue giving presentations in FY 2021 with the addition of a regional HOLA member to help provide a more local perspective.</p> <p>Hispanics GS-13 and above received awards and recognition (6.6 percent) at nearly the same rate of their participation in the workforce at the same grades (6.7 percent).</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 2020, female bank examiners' participation rate 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 demographic 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) 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.
Other (Please Describe)	Yes	Monitored the number of female applicants for entry-

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
		<p>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 the number of entry-level female bank examiners was limited in the applicant pool and that they 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	09/30/2024	Yes	10/01/2017	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Senior Deputy Comptroller and Chief Operating Officer	Blake Paulson	Yes
Senior Deputy Comptroller for Large Bank Supervision (LBS)	Maryann Kennedy	Yes
Senior Deputy Comptroller for Midsize and Community Bank Supervision (MCBS)	Sydney Menefee	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.		09/30/20
09/30/18	Enhance current recruitment sources to ensure applicant pools of qualified female candidates.		09/30/20
09/30/18	Expand the Entry-Level Bank Examiner Recruitment Program efforts and recruitment		09/30/20

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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.		09/30/20
09/30/18	Recruit students through the District Financial Internship Program.		09/30/20
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.	09/30/21	09/30/20
09/30/18	Continue to promote diversity in recruiters and interview panels.		09/30/20
09/30/18	Participate in the Women's MBA Conference; Women in Wealth Management Conference; National Association of Black Accountants national and regional conferences and career fairs; and the Community Reinvestment and Fair Lending Conference.	09/30/21	
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).	09/30/21	
09/30/18	Further develop strong relationships with college campus groups such as BAP.		09/30/20
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.		09/30/20
09/30/18	Support more internal mentoring circles to engage with female employees on how to balance the responsibilities of work and family.		09/30/20

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Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
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.		09/30/20
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.		09/30/20
09/30/18	Continue regular reviews with senior management and employee network group (ENG) to highlight areas of concern and opportunities for improvement.		09/30/20

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2020	<p>In FY 2020, the workforce participation rate of female bank examiners remained steady at 38.4 percent from FY 2019 and above the 36.1 percent in FY 2005, but below the 2010 OCLF rate of 45.3 percent. Separation rates improved in FY 2020 for female bank examiners. Their rate of separation (34.1 percent) was below their workforce participation rate of 38.4 percent and their rate of separation in FY 2019 (43.8 percent). The hiring rate (30.5 percent) of female bank examiners was below their OCLF rate (45.3 percent) and their hiring rate in FY 2019 (31.8 percent). Hiring rates for female bank examiners in key bank supervision groups were as follows: for MCBS, 30.6 percent entry-level (pre-commissioned) and 25.0 percent experienced; for Bank Supervision Policy, 50.0 percent, experienced level; and for LBS, 33.3 percent, experienced level.</p> <p>The OCC conducted outreach recruitment through LinkedIn at more than 25 women’s associations and organizations, including Women in Housing and Finance, Women’s Diversity Network, Women’s World Banking, National Association for Female Executives, and National Council of Negro Women.</p> <p>In addition, the OCC hired 107 entry-level bank examiners, of whom 30.8 percent (33) were female, below the FY 2019 hiring rate (32.8 percent).</p> <p>The OCC conducted an applicant flow data analysis of the entry-level bank recruitment campaign in 2020 (Fall 2019 and Spring 2020). The applicant pool rate for females who self-identified was 39.5 percent with a selection rate of 30.9 percent; both 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 in FY 2020 (as of August 25, 2020),</p>

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FY 2020	<p>including entry-level examiners, by gender. The applicant pool rate for females who self-identified was 38.8 percent and the selection rate were 43.3 percent; the applicant pool and the selection rate 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 processes.</p> <p>Female bank examiners were promoted at a higher rate (43.2 percent) than their participation in the workforce (38.4 percent). During FY 2020, three Uniform Commission Examination (UCE) testing sessions were held. Of the 49 bank examiners who successfully passed the UCE, 36.7 percent (18) were female, below their average availability pool rate (38.5 percent).</p> <p>The OCC continued to hire financial interns in its district offices. In FY 2020, the districts hired two financial interns, one of whom was female.</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. Five mentoring circles were offered in FY 2020 to help employees successfully address career issues. Mentoring circle topics included “Career Exploration,” “Uniform Commission Examination Preparation,” and “Leadership.” A total of 25 mentors, 30 mentees, and 14 mentoring committee members participated in the circles, a 40.5 percent decline below FY 2019 participation total (116). Of the FY 2020 participants, 76.8 percent (53) were female, 23.2 percent were Black, 5.8 percent were Asian, 5.8 percent were Hispanic, and 1.4 percent were from small ERI groups. The participation rates for all groups, except Blacks and Hispanics, were lower than the rates in FY 2019.</p> <p>In addition, TWN continued its Resource Groups mentoring program with two resource groups—“Managing Your Career” and “Work Life Navigation,” in which over 200 employees participated. The program held two events, including “Leveraging Self-Assessment Techniques,” and hosted a cadre chat; organized a presentation on male allyship, in partnership with senior management, OWMI, and the agency’s other ENGs, at which the presenters spoke from their book “Athena Rising”; held a teleconference on “Achieving Balance by Setting Limits and Making Tough Choices” with over 70 attendees; published two newsletters and sent monthly TWN president’s messages to members; and promoted TWN events in OCC-wide internal communications.</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	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. In FY 2020, females overall and females in all EEO groups in senior-level position (SLP) were participating below their workforce participation rates or absent: females (31.5 percent vs. 44.3 percent) and minorities (25.9 percent vs. 36.0 percent).

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 demographic 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 reports from several federal, private sector, and special interest groups (e.g., 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	09/30/2024	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.		09/30/20
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).		09/30/20
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.		09/30/20

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Report of Accomplishments

Fiscal Year	Accomplishments
FY 2020	<p>The participation of females and minorities in supervisor roles and SLP remained a priority for the OCC in FY 2020. Females participated at 44.3 percent in the workforce and held 39.1 percent of supervisor positions and 31.5 percent of SLP; both rates remained below their workforce participation rate. Female participation rates increased in supervisor roles (1.1 percentage points) and SLP (1.3 percentage points) between FY 2019 and FY 2020.</p> <p>Minorities also participated in supervisor roles and SLP below their overall workforce participation rates; however, minorities increased their participation in supervisor roles in FY 2020. Minorities participated at 36.0 percent in the workforce and held 28.2 percent of supervisor positions and 25.9 percent of SLP. In supervisor roles, participation rates of all minority groups increased or remained near the same in FY 2020, except Asians.</p> <p>In addition, females (33.3 percent) and minorities (33.3 percent) in SLPs participated in the Executive Coaching Program, a 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 (61.2 percent) and minorities (23.9 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 2020. Participation rates increased from FY 2019 for females by 14.0 percentage points and for minorities by 2.5 percentage points.</p>

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

New B4-1 in Data Insight (DI):

The participation rate for PWD in grade cluster GS-11 to SES⁸ was 8.97 percent in FY 2020, 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 in DI:

The participation rate of PWTD in the GS-11 to SES cluster was 1.80 percent in FY 2020, which falls below the goal of 2 percent.

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

⁸ 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	88	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 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

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Course for hiring managers will be updated to include additional information about special hiring authorities.

The Workplace Services team receives contracting officer's technical representative 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 outreach efforts to Disability and Military Student offices to promote entry-level and internship opportunities.
- Participates in recruitment events, fairs, and conferences, e.g., Hiring Heroes, Federal Disability Workforce Consortium, Department of Labor's WRP Training, and 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 and 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.

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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. Two of the OCC's primary sources for Schedule A and veteran résumé searches are 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 résumés via email from Schedule A applicants and forwarded them to the servicing HR specialists, as well as alerted candidates to submit their résumés 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 résumés directly to the Special Placement Program Coordinator (SPPC) for vacant positions within the OCC, the SPPC refers applicants to the www.occ.gov/careers website to apply for any specific job announcement for which they want consideration. Applicants are also reminded to submit supplemental documentation that makes them eligible for a Schedule A appointment. The OCC also informs applicants, via email, that 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 HR 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, 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

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the Whistleblower Ombudsman, and role of the Office of Special Counsel. Training is 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 to share 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 staff.

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 |

New B1 in DI:

- PWD Hires: 10.71 percent vs. 12.0 percent
- PWTD Hires: 1.79 percent vs. 2.0 percent

Hiring rates for PWD and PWTD were below the Section 501 goal of 12.0 percent and 2.0 percent, 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 0 | No X |
|----------------------------|-------|-------------|

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

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

FY 2020 Hires	Qualified vs. Hires	Qualified vs. Hires
0110: 3 Hires	PWD: 4.26% - 0.0%	PWTD: 4.26% - 0.00%
0570: 131 Hires	PWD: 3.20% - 8.40%	PWTD: 1.33% - 1.53%
0905: 2 Hires	PWD: 7.89% - 0.00%	PWTD: 3.95% - 0.00%

The hiring rates for occupation series 0570 for PWD and PWTD were above their qualified applicant flow rates.

Because the OCC has limited hiring of attorneys (0905) and economists (0110), 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 0 No **0**

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

New B6 in Monster. Relevant applicant pool is the applied compared with the qualified. NA in qualified applicant means Not Available and ND means No Data

FY 2020 Promotions	Applicants vs. qualified	Applicants vs. qualified
0110: 0 Promotions	PWD: ND - ND	PWTD: ND - ND
0570: 1 Promotions	PWD: 7.94% - 7.89%	PWTD: 3.53% - 3.62%
0905: 0 Promotions	PWD: 0.0% - 0.0%	PWTD: 0.0% - 0.0%

The OCC noted a slight difference (0.05 percent) in the occupational series 0570 when comparing the applicants with qualified candidates for PWD. The difference is less than 1 percent and not considered a trigger at this time.

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 DI 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 and ND means No Data.

FY 2020 Promotions	Qualified vs Promotions	Qualified vs Promotions
0110 (0) Promotions:	PWD: ND - NS	PWTD: ND - NS
0570 (1) Promotions:	PWD: 7.89% - 0.00%	PWTD: 3.62% - 0.00%
0905 (0) Promotions:	PWD: 0.00% - NS	PWTD: 0.00% - 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 the 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.
- 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 0 **No X**
- b. Awards, Bonuses, & Incentives (PWTD) **Yes X** No 0

New B9-2 DI. 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	1.23%	0.00%	2.06%
11-20	0.00%	0.00%	0.09%
21-30	0.00%	0.00%	0.06%
31-40	0.61%	1.49%	0.03%
Awards	PWD	PWTD	No Disability
< \$500	65.64%	77.61%	66.64%
\$501-999	39.57%	46.27%	35.20%
\$1000-1999	15.03%	17.91%	13.17%

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 PWTD in the less than 10 hours (2.06 percent) time-off award category is more than 1 percent difference and it is considered a trigger at this time.

The inclusion rate for PWD fell below the inclusion rates for employees with no disabilities in the less than \$500 cash award category. The difference is less than 1 percent and it is not 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 DI and the new B7 Monster. NA in qualified applicant means Not Available.

Relevant Applicants/Qualified/Promotions

GS-13 - PWD: 11.79% - NA - 33.33%
 GS-14 - PWD: 10.92% - NA - 0.00%
 GS-15 - PWD: 7.40% - NA - 0.00%
 SES - PWD: 5.96% - 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 DI and the new B7 Monster. NA in qualified applicant means Not Available.

Relevant Applicants/Qualified/Promotions

GS-13 - PWTD: 1.90% - NA - 0.00%
 GS-14 - PWTD: 2.08% - NA - 0.00%
 GS-15 - PWTD: 1.71% - NA - 0.00%
 SES - PWTD: 1.66% - 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 - 21.21%
GS-14 - PWD: NA - 11.11%
GS-15 - PWD: NA - 0.00%
SES - PWD: 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.

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 – 0.00%
GS-14 - PWTD: NA - 0.00%
GS-15 - PWTD: NA - 0.00%
SES - PWTD: 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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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 DI and the new B8 Monster. NA in qualified applicant means Not Available.

Relevant Pool/Qualified Applicants/Promotions

Executives - PWD: 8.20% - 0.00% - 0.00%
 Managers - PWD: NA - NA - 0.00%

There were no internal supervisor vacancy announcements or 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 DI and new B8 Monster. NA in qualified applicant means Not Available.

Relevant Applicant/Qualified Applicants/Promotions

Executives - PWTD: 1.31% - 0.00% - 0.00%

Managers - PWTD: NA - 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 DI and new B8 Monster. NA in qualified applicant means Not Available.

Qualified Applicants/Hires

Executives - PWD: 0.0% - 0.0%

Managers - PWD: NA - No hires

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

Qualified Applicants/Hires

Executives - PWTD: 0.00% - 0.00%

Managers - PWTD: NA - No hires

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 2020, the OCC converted one Schedule A employee hired in FY 2018 to career status.

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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 DI:

The inclusion rate for PWD exceeded the rate of persons with no disabilities for involuntary (0.61 percent vs. 0.22 percent) and voluntary separations (10.12 percent vs. 6.39 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 DI:

The inclusion rate of PWTD (14.92 percent) exceeded the rate of persons without disabilities for voluntary (6.39 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 2020, there were four exit survey respondents with disabilities: one retired, two accepted other positions, and one left to continue their education. A large majority (75.0 percent) indicated they would recommend the OCC/Treasury as a good place to work. Also, 50.0 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.

Six issues were cited equally by PWD as the primary reason for leaving (recognizing there were only four respondents): office morale; promotional practices; training opportunities; recognition of efforts, contributions, and achievements (relationship with supervisor); empowerment to improve performance (relationship with supervisor); and demonstration of skills and capabilities (work experience). In the agency-wide survey results, office morale 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.

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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://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 2020, the OCC continued to work toward ensuring 508 users had necessary information communication technology to effectively perform their job. The OCC also worked with the Department of Defense Computer/Electronic Accommodations Program Center to secure an iPad for a hearing-impaired individual to use for real-time video interpretation. Additionally, the OCC launched a new employee network group, the Differently Abled Workforce Network, DAWN.

The OCC also developed a Section 508 and 504 Awareness Training that enhanced employees' knowledge of accessibility programs. The eight-minute video gives a broad overview of the OCC's Section 508 and 504 compliance policies as well as real-world examples of OCC employees' experiences. It also provides resources to learn more about Sections 508 and 504.

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.

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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

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 2020, 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 2020, and will continue to do so in FY 2021.

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 the Treasury's PAS policy and procedures, which follow the requirements established by the OPM. In addition, the Treasury Department has procured a Treasury-wide PAS contract. This contract will allow the OCC to establish a blanket purchase agreement (BPA) against the Treasury-wide base contract. The OCC has set up its BPA with the procurement office to use these services when necessary.

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 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

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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 information technology specialist (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 demographic 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

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		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 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	Yes		09/30/20

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	the lengthy traditional hiring 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		09/30/20
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		09/30/20
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		09/30/20
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		09/30/20
09/30/19	8. Host an event to recognize National Disability Day and the launch of the Differently Abled Workforce Network (DAWN).	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		09/30/20

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Fiscal Year	Accomplishments
	<p>Between FY 2016 and FY 2020, PWD in mission-critical/major occupations (MCO)—bank examiners, attorneys, economists, and IT specialists—participated (6.5 percent) below the EEOC goal of 12.0 percent. In FY 2020, PWD increased participation in all MCO positions from FY 2019—bank examiners (6.8 percent vs. 7.0 percent), attorneys (3.6 percent vs. 4.3 percent), economists (6.1 percent vs. 6.2 percent), and ITS specialists (10.6 percent vs. 10.8 percent).</p> <p>PWD in MCO were hired at a rate of 4.4 percent on average from FY 2016 through FY 2020, below the EEOC goal of 12.0 percent. In FY 2020, 61.1 percent of the OCC hires with disabilities were in MCO, represented by 11 bank examiners. There are limited hiring opportunities in the attorney, economist, and IT specialist occupations. In addition, the OCC maintained its staffing priorities, resulting in fewer external hires in FY 2020, and it continued its focused effort on development and retention of the current workforce.</p> <p>Separations of PWD in MCO (8.5 percent) between FY 2016 and FY 2020 on average were above their workforce participation rate (6.5 percent). In FY 2020, the rate of separations of PWD decreased from FY 2019 in bank examiner (12.0 percent vs. 9.5 percent) and economist (33.3 percent vs. 16.7 percent) positions. Also, attorneys (0.0 percent) separated at a percentage below their workforce participation rate (4.3 percent).</p>

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

N/A

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 6.2 percent in FY 2016 to 9.2 percent in FY 2020.

In FY 2020 (as of August 25, 2020), the applicant flow rate for PWD was 13.4 percent and the selection rate was 6.0 percent. While the applicant flow rate exceeded the EEOC goal of 12.0 percent, the selection rate fell below the goal.⁹

The OCC retained 81.3 percent of its non-competitive Schedule A hires from FY 2016 and FY 2020 and converted 75.0 percent of its eligible Schedule A hires since FY 2016.

⁹ In FY 2020, the method used to group categories of disabled employees changed in the applicant flow data analysis process to include “disabled undefined.” This created a large number of disabled applicants based on respondents identifying as disabled undefined.

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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.

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 demographic 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		09/30/20
09/30/18	2. Share developmental opportunities available throughout the agency with PWD through the ENGs.	Yes		09/30/20
09/30/18	3. Managers will encourage PWD to participate in developmental opportunities that support their career goals at the OCC.	Yes		09/30/20
09/30/19	4. Managers are strongly encouraged to manage the date the employee is eligible for conversion into the competitive	Yes		09/30/20

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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	<p>5. Hold annual self-identification campaigns during National Disability Employment Awareness Month.</p>	Yes		09/30/20
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>Partner with Leadership, Executive, and Organizational Development (LEOD) and Continuing Education (CE) to</p> <p>a) ensure concerns associated with PWD are considered in course development.</p> <p>b) enhance OCC courses with language that clearly is more inclusive of PWD.</p>	Yes	09/30/21	09/30/20
09/30/20	<p>7. Publish semiannually through various methods (e.g., "What's New at the OCC" (WNOCC)/ <i>SuperVisions</i>/OCCnet) information and data on PWD, to include workforce participation, hiring, and</p>	Yes		

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	separation rates.			
09/30/20	8. Educate all employees and managers/supervisors at least once a year (each) on the reasonable accommodation process by partnering with DAWN and OMWI by various educational methods, such as <ul style="list-style-type: none"> • hosting webinars, brown-bag lunches, workshops, and/or panel discussions. • featuring and spotlighting relevant topics, stories, and/or videos in <i>SuperVisions</i>, WNOCC, and on OCCnet. 	Yes		
09/30/20	9. Share with all employees semiannually helpful hints, best practices, and technology-based information that can support all employees, particularly those with 508 needs. Share through WNOCC, <i>SuperVisions</i> , and OCCnet.	Yes		
Fiscal Year	Accomplishments			
	The participation rates of PWD in career development programs were generally absent or below their relevant workforce participation rates from FY 2013 through FY 2019. However, in FY 2020, PWD exceeded their workforce participation in several career development programs, including the following: EXCEL I (20.0 percent vs. 8.1 percent), Executive Coaching Program (7.9 percent vs. 6.8 percent), Leadership courses (13.9 percent vs. 9.2 percent) and internal career developmental courses (10.4 percent vs. 9.2 percent).			

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

The OCC's initial work focused on establishing and launching DAWN. During this next phase in FY 2021, the agency will begin to work closely with stakeholders such as LEOD and CE to ensure concerns associated with PWD are considered in course development and language that is more inclusive and indicative of PWD.

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

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Participation rates for PWD have gradually increased over the last five years, from 6.2 percent in FY 2016 to 9.2 percent in FY 2020.

In FY 2020 (as of August 25, 2020), the applicant flow rate for PWD was 13.4 percent and the selection rate was 6.0 percent. While the applicant flow rate exceeded the EEOC goal of 12.0 percent, the selection rate fell below the goal.¹⁰

The OCC retained 81.3 percent of its non-competitive Schedule A hires in the period from FY 2016 through FY 2020 and converted 75.0 percent of its eligible Schedule A hires since FY 2016.

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.

¹⁰ In FY 2020, the method used to group categories of disabled employees changed in the applicant flow data analysis process to include “disabled undefined.” This created a large number of disabled applicants based on respondents identifying as disabled undefined.