Office of the Comptroller of the Currency Annual Equal Employment Opportunity and Diversity Program Status Report

MD-715 Summary Report

Fiscal Year 2014 Accomplishments and Fiscal Year 2015 Plans

Introduction

The Office of the Comptroller of the Currency (OCC) is required by Congress and the Equal Employment Opportunity Commission's Management Directive 715 to submit an annual report on its diversity and equal employment opportunity (EEO) program activities. This report summarizes the OCC's "Annual Equal Employment Opportunity and Diversity Program Status Report (MD-715)" for fiscal year 2014 accomplishments and fiscal year 2015 plans.

As of October 4, 2014, the OCC's permanent workforce totaled 3,837 employees, a net change of 2.1 percent below the 3,919 employees in fiscal year 2013. This change was due to a decrease in the number of hires (a 45.3 percent net change) and an increase in the number of separations (20.0 percent net change) in fiscal year 2014. At the end of fiscal year 2014, all major EEO groups were at or near parity with the 2010 national civilian labor force (NCLF) rates,¹ with the exception of Hispanics and White females.

Although the OCC continued to work to address the low participation of Hispanics in its workforce, their overall participation rate remained below their NCLF rate. Hispanic participation rates were also below parity in the following occupational positions—economists, bank examiners (Hispanic females), and all other occupational job series (Hispanic males). Similarly, female bank examiners across EEO groups participated below their occupational civilian labor force (OCLF) rate in bank examiner positions (see table 1). In addition, the OCC continued to focus on the low participation rates of females and minorities in supervisor roles and senior-level positions (SLP).

The OCC recognizes that the continued success of its mission depends on the employment of talented staff with high levels of expertise and experience. To maintain a competent, highly qualified workforce, the OCC is committed to using and retaining its employees' skills fully, while recruiting the best talent available from a variety of sources. The OCC is also committed to maintaining an inclusive culture and workplace environment with a diversity strategy that

¹ NCLF data are derived from the 2010 census and reflect persons 16 years of age or older who are employed or are actively seeking employment. The data are adjusted for citizenship and exclude those in the armed services. The OCC's workforce demographics benchmark comparisons are made against the 2010 NCLF availability rates and OCLF availability rates for the OCC's three major occupational groups—bank examiners, attorneys, and economists. See table 1 for more details.

focuses on leadership commitment, recruitment, development, retention, work/life balance, and an engaging culture.

In fiscal year 2014, the OCC addressed the following key areas:

- Increasing the number of Hispanic employees in the OCC workforce.
- Increasing the number of female bank examiners in the OCC workforce.
- Increasing the number of individuals with disabilities and individuals with targeted disabilities in the OCC workforce.
- Increasing the number of females and minorities in supervisor roles and SLPs in the OCC workforce.
- Increasing the use of alternative dispute resolution (ADR) during the EEO pre-complaint process.

Areas of Focus in Detail

Hispanic Employees

The participation of Hispanic employees remained steady in the OCC's permanent workforce at 6.6 percent between fiscal year 2013 and fiscal year 2014. Hispanics were well represented above the OCLF rate for attorneys (7.6 percent versus 4.3 percent) and male bank examiners (3.8 percent versus 3.1 percent). Hispanic female bank examiners, however, participated below their OCLF rate (2.4 percent versus 3.7 percent). Low participation rates of Hispanics were also in the economist occupation (4.2 percent versus 5.1 percent) and males in the all other occupational job series (2.8 percent versus 5.2 percent).

In fiscal year 2014, the OCC made steady improvement in hiring Hispanic employees in its major occupational groups. Hispanics were hired at rates greater than their OCLF comparators for bank examiners (7.4 percent versus 6.8 percent), attorneys (20.0 percent versus 4.3 percent), and economists (14.3 percent versus 5.1 percent) (see table 2).

The OCC continued to benefit from its Hispanic employee network group, the Hispanic Organization for Leadership and Advancement (HOLA). In fall 2014, HOLA, in partnership with the OCC's other employee network groups, hosted a national panel titled "Advancing Your Career: Specialty Areas and Opportunities" as part of a career advancement and retention activity. In addition, HOLA continued to use its SharePoint site, "HOLA Connected," to facilitate the exchange of information and advice, and to promote mentoring relationships among its members.

In fiscal year 2015, the OCC continues to focus on increasing the participation rate of Hispanics, with special emphasis on external hiring opportunities in job series with underrepresentation of Hispanics. The OCC also continues to collaborate with HOLA to foster retention and developmental programs.

Female Bank Examiners

Fiscal year 2014 was another challenging year in the OCC's efforts to increase the participation of female bank examiners in the workforce. Their participation in the workforce decreased slightly, from 39.2 percent to 38.5 percent, and remained below the OCLF rate of 45.3 percent. Low participation trends for female bank examiners exist across all EEO groups except Native Americans. The hiring rate for female bank examiners was also below the OCLF rate, 32.4 percent versus 45.3 percent, and behind their hiring rate in fiscal year 2013 of 35.1 percent (see table 3).

In fiscal year 2014, the separation rate for female bank examiners (40.5 percent) was above their workforce participation rate (38.5 percent). Resignations accounted for 51.6 percent of separating female bank examiners and retirements accounted for 36.8 percent. Employee exit survey responses cited job stress, travel requirements, office morale, career growth, and pay as the greatest factors affecting female bank examiner separations.

Efforts to identify and address barriers to the hiring and retention of female bank examiners include continued collaboration with the OCC's Office of Minority and Women Inclusion (OMWI), Office of Human Capital, and Bank Supervision departments on targeted recruitment and retention strategies. Efforts include, enhancing current recruitment processes and sources for entry- and experienced-level female bank examiners; piloting an entry-level bank examiner recruitment program in Large Bank Supervision; advertising with targeted professional organizations for specialty skills; offering referral bonuses for successful, experienced external bank examiner hires (males and females); and partnering with the Women's Network to sponsor mentoring and networking activities to support female bank examiner retention. In fiscal year 2014, the Women's Network held mentoring circles on relevant topics like "Career Exploration at the OCC," "Work/Life Balance," and "Uniform Commission Examination Preparation."

In addition, the OCC's annual Career Forum provided three-year pre-commissioned examiners with information about examiner career opportunities and the Uniform Commission Examination and cross-credential preparatory processes. Of the 69 OCC pre-commissioned examiners who successfully passed the Uniform Commission Examination in fiscal year 2014, 49.3 percent were female, down from 52.8 percent in fiscal year 2013. Of the 347 OCC examiners who successfully passed the cross-credential test in fiscal year 2014, 40.3 percent were female, up from 38.8 percent in fiscal year 2013.

Individuals With Disabilities

In fiscal year 2014, the OCC slightly increased the workforce participation rate of individuals with disabilities to 5.2 percent, 0.2 percentage points above the fiscal year 2013 rate. The OCC also hired 20 (9.1 percent) individuals with disabilities in fiscal year 2014, above their workforce participation rate (5.2 percent), separation rate (7.2 percent), and fiscal year 2013 hire rate (7.8 percent). The participation rate of individuals with targeted disabilities in fiscal year 2014 remained stable at 0.3 percent, the same as in fiscal year 2013. Two individuals with targeted disabilities were hired at the OCC in fiscal year 2014, representing 0.9 percent of the total hires,

above their workforce participation rate (0.3 percent) and their hire rate (0.2 percent) in fiscal year 2013 (see table 4).

The OCC continued to explore ways to recruit individuals with targeted disabilities to reach the U.S. Department of the Treasury's goal of 2.0 percent workforce participation. Agency efforts included participation in career fairs; outreach to potential candidates through the Internet and with organizations that support individuals with disabilities for permanent employment, summer hiring programs, and internships; and sponsored disability awareness month activities for all employees.

Females and Minorities in Supervisor Roles and SLPs

In fiscal year 2014, the OCC continued to experience low participation of females and minorities in supervisor positions and SLPs compared with their workforce participation rate. Females participated at 45.1 percent in the OCC workforce and held 39.1 percent of supervisor positions and 32.7 percent of SLPs. Minorities participated at 32.4 percent in the workforce and held 24.6 percent of supervisor positions and 15.3 percent of SLPs. Female participation increased in fiscal year 2014 in both supervisor positions (1.7 percentage points) and in SLPs (0.1 percentage points), including the addition of another female senior executive to the Executive Committee. Minority participation increased in fiscal year 2014 in both supervisor positions (0.7 percentage points) and in SLPs (1.1 percentage points) (see tables 5 and 6).

The OCC's agency-wide strategic initiative called "Leading" created a systematic and sustainable process for evaluating and developing the agency's leadership pipeline to ensure continuity and diversity in leadership. To accomplish this, the OCC built a framework for succession planning, identified training and developmental needs for current and new managers and supervisors, and created a process for identifying and sharing external career development opportunities. In addition, the agency created a Leadership Developmental Advisory Board to provide ongoing leadership, guidance, and governance for leadership development. The Deputy Comptroller for the Office of Human Capital and the OMWI Executive Director are members of the Leadership Developmental Advisory Board.

Alternative Dispute Resolution

The Treasury Department set a goal for bureaus to process at least 45.0 percent of EEO precomplaints through ADR in lieu of EEO counseling. The OCC continued to market its ADR Program as an alternative means of resolution in its updated ADR Policy Statement and made it available to all staff via the OCC's intranet site; held mandatory training for new managers, training team leaders and assistants, and all new hires; and highlighted ADR in its 2014 No FEAR Act training that was mandatory for all employees.

In fiscal year 2014, the OCC's ADR participation rate decreased to 8.0 percent from 19.0 percent in fiscal year 2013. The decline in participation was largely due to an increase in the number of cases ineligible for ADR (10 in fiscal year 2013 to 15 in fiscal year 2014). In fiscal year 2014, 60.0 percent of the cases were ineligible for ADR. The OCC does not offer ADR for pre-

complaints involving non-selection of an external applicant, termination, criminal activity, fraud, waste, and abuse.

In fiscal year 2015, the agency will conduct a manager's forum on ADR and highlight ADR as part of the series of management training initiatives, conduct a brown-bag session on ADR for employees during the Treasury Department's Dispute Prevention Week, continue to evaluate how to remove potential barriers to ADR, and analyze cases in which ADR was not used.

Model Equal Employment Opportunity and Diversity Program Elements

Commitment and Integration

On September 30, 2014, Comptroller of the Currency Thomas J. Curry issued the agency's annual EEO policy statement, reiterating the OCC's commitment to EEO, diversity, and maintaining a workplace free of harassment. The Comptroller also reissued the agency's policy statements on "Alternative Dispute Resolution and Anti-Harassment." The agency's OMWI Executive Director meets regularly with the Comptroller and routinely reviews EEO and diversity agenda items with the Human Capital Subcommittee of the Executive Committee.

Senior managers receive annual reports titled "State of the Workforce" and "State of Diversity," which cover retirement patterns, skill gap assessments, recruitment and hiring, training and career development, leadership and management development, pay, benefits, performance, promotions, and retention. Moreover, the MD-715 report is reviewed annually with the Comptroller after input from Executive Committee members.

The OCC has 11 full-time EEO and diversity staff members. The agency has six employee network groups: HOLA; the Women's Network; the Network of Asian Pacific Americans; the Coalition of African American Regulatory Employees; PRIDE (the Gay, Lesbian, Transgender, and Bisexual Employees network group); and the newest group, Generational Crossroads (Crossroads), launched in 2014.

The OCC continued to implement the goals and objectives of its "Aligning" and "Leading" strategic initiatives that were established in fiscal year 2013. Among other things, these initiatives include efforts to address diversity, retention, recruitment, and leadership development.

Accountability

Managers, supervisors, and EEO officials are accountable for the effective implementation of the agency's EEO and diversity programs and plans. The OMWI Executive Director and Office of Human Capital officials meet regularly to share information and address areas of interest or concern relative to the agency's personnel programs, policies, and procedures, and ensure that the OCC meets its EEO requirements. Such collaboration allows for a more robust exchange of ideas on matters with overarching agency implications. The OMWI and the Office of Human Capital have a strong partnership and work together to support and address the agency's human capital needs and challenges.

In fiscal year 2014, the Treasury Department's Office of Inspector General, at the request of the U.S. House Committee on Financial Services, reviewed the OCC's personnel practices and other efforts to increase agency diversity, create a workplace free of systemic discrimination, and provide equal opportunity for minorities and females to obtain senior management positions. The results of the Office of Inspector General's final report concluded that the OCC tracks diversity levels and has taken steps to increase diversity in its workforce, which has resulted in the OCC employing minorities and females at a rate generally equivalent to nationwide participation rates. Additionally, the Office of Inspector General found that the OCC's OMWI has made efforts to increase diversity across the workforce by participating in outreach programs and supporting employee network groups. The Office of Inspector General concluded, however, that while participation of minorities and females in the OCC supervisory and SLPs is increasing, that participation falls below their workforce participation rates. The Office of Inspector General recommended that the OCC continue its efforts to increase participation of minorities and females in supervisory and SLPs. The OCC agreed with the recommendation and remains committed to ensuring a diverse and inclusive work environment.

The OCC conducts periodic reviews of its merit promotion program policy and procedures, employee recognition and awards program, and programs for employee development and training to address deficiencies or concerns.

Mandatory orientation sessions for new managers, training team leaders and assistants, and all new hires include information on policy statements and procedures related to EEO, ADR, antiharassment, and diversity. This information is posted on the OCC's intranet and in prominent locations at OCC Headquarters, district offices, and field offices. All employees received mandatory No FEAR Act training in 2014; all new employees take this mandatory training within 60 days of their hire date.

The performance plans of all OCC managers include an element on EEO that focuses on the managers' ability to establish and maintain a non-discriminatory and regulatory-compliant working environment; employ fair and inclusive recruitment and retention strategies; and support a workplace where all employees can contribute fully and achieve their greatest potential. A manager cannot achieve the highest overall performance rating without receiving the highest rating in all elements, including the element on EEO.

The OCC used an online exit survey to gauge the demographic profile of employees voluntarily separating from the agency, their overall work experience, and reasons for leaving. Of the 172 respondents in fiscal year 2014, 87.2 percent were positive about their work experience; 80.8 percent would work for the OCC again; and 90.7 percent would recommend the OCC as a good place to work. The demographic profile of survey respondents in most cases was similar to the OCC's respective workforce profiles as a whole.

In 2014, the OCC participated in the Office of Personnel Management's annual Federal Employee Viewpoint Survey to measure employees' views on topics pertaining to diversity, family-friendly culture, leadership, pay, teamwork, and training and development. More than 2,000 OCC employees completed the survey, a 64.0 percent response rate. OCC employees' ratings were more favorable than respondents in the Treasury Department and the federal

government as a whole, and remained essentially the same from the 2013 survey or increased. OCC employees rated their satisfaction with their work experience, immediate supervisor, worklife balance, and agency experience as most favorable.

Proactive Prevention and Efficiency

The OCC has sufficient staffing, funding, and authority to comply with the time periods established by federal regulations for processing EEO complaints of employment discrimination. The agency has an efficient and fair process for resolving disputes in the workplace and has a system for evaluating the effectiveness of its complaint-processing program. In fiscal year 2014, the OCC processed all of its informal complaints in a timely manner. OCC analysis showed that the most common bases for EEO complaints were race, sex, age, and disability. The most common issues were non-selection, harassment (nonsexual), and performance evaluation.

Compliance

The OCC continues to ensure that agency personnel are accountable for full compliance with EEO statutes and regulations, policy guidance, and other written instructions. The OCC's performance standards hold managers accountable for complying with Equal Employment Opportunity Commission guidelines. The OCC submitted all quarterly ADR reports and its annual "Statistical Report of Discrimination Complaints" in a timely manner. The OCC remains committed to providing fair and just employment and taking proactive steps to eliminate barriers to equal opportunity.

About This Report

This report summarizes the OCC's "Annual Equal Employment Opportunity and Diversity Program Status Report" for fiscal year 2014 accomplishments and fiscal year 2015 plans that was submitted to the Equal Employment Opportunity Commission through coordination with the Treasury Department, under the Equal Employment Opportunity Commission's Management Directive 715.

For additional information on the OCC's EEO and Diversity and Inclusion Program, please contact OMWI at (202) 649-6460.

	Total	Male	Female	Asian	Black	Hispanic	Small ethnicity and race indicator groups	White
OCC workforce	3,837	54.9%	45.1% ^a	7.7%	16.7%	6.6% ^a	1.4% ^a	67.6% ^a
2010 NCLF		51.9%	48.1%	3.9%	12.0%	10.0%	1.8%	72.3%
Bank examiner	2,544	61.5%	38.5% ^a	5.8% ^a	11.8% ^a	6.2% ^a	1.3%	74.9%
2010 examiner OCLF		54.7%	45.3%	7.7%	12.3%	6.8%	0.9%	72.4%
Attorney	184	53.8% ^a	46.2%	6.5%	4.9%	7.6%	0.5% ^a	80.5% ^a
2010 attorney OCLF		66.7%	33.3%	3.6%	4.7%	4.3%	0.9%	86.4%
Economist	71	63.4% ^a	36.6%	32.4%	0.0% ^a	4.2% ^a	0.0% ^a	63.4% ^a
2010 economist OCLF		67.1%	32.9%	7.6%	5.5%	5.1%	0.9%	81.0%
All other series	1,038	38.4% ^a	61.6%	10.9%	32.1%	7.7% ^a	1.8%	47.4% ^a
2010 NCLF		51.9%	48.1%	3.9%	12.0%	10.0%	1.8%	72.3%

Table 1: OCC's Workforce Profile as of October 4, 2014

Source: MD-715 workforce data table as of October 4, 2014.

^a EEO groups participating at rates below the 2010 NCLF and OCLF.

Note: Small ethnicity and race indicator groups are Native Americans, Native Hawaiians, and persons of two or more races combined, due to their small population size.

			FY 2011	FY 2012		FY 2013	FY 2014
	Hires		3.4% ^a	5.6%	6.8% 2010 OCLF	7.8%	7.4%
Bank examiner	Separations	3.8% 2000 OCLF	5.4%	4.4%		4.8%	9.1% [♭]
	OCC wrk. part. %		5.9%	6.0%		6.3% ^a	6.2% ^a
	Hires		14.3%	14.3%	4.3% 2010 OCLF	0.0% ^a	20.0%
Attorney	Separations	3.5% 2000 OCLF	0.0%	0.0%		0.0%	11.1% [⊳]
	OCC wrk. part. %		6.3%	7.1%		7.3%	7.6%
	Hires		0.0% ^a	0.0% ^a	5.1% 2010 OCLF 10.0% 2010 NCLF	20.0%	14.3%
Economist	Separations	5.1% 2000 OCLF	0.0%	0.0%		20.0% ^b	16.7% ^b
	OCC wrk. part. %		4.8% ^a	4.5% ^a		4.4% ^a	4.2% ^a
	Hires		3.1%ª	14.6%		10.5%	5.5%ª
All other series	Separations	10.7% 2000 NCLF	8.9% ^b	3.1%		6.4%	1.4%
	OCC wrk. part. %		5.0% ^a	7.0% ^a		7.4% ^a	7.7% ^a

Source: MD-715 workforce data table as of October 4, 2014.

^a Hispanic workforce participation and hiring rates below the relative 2000 and 2010 NCLF or OCLF.

^b Hispanic separation rate above their workforce participation rate.

			FY 2011	FY 2012	l.	FY 2013	FY 2014
	Hires	42.4%	41.6% ^a	36.0% ^a	45.3% 2010	35.1% ^a	32.4% ^a
Female	Separations	2000	32.7%	31.9%		35.1%	40.5% ^b
	OCC wrk. part. %	OCLF	38.7% ^a	38.8% ^a	OCLF	39.2% ^a	38.5% ^a
	Hires	2.8%	4.5%	2.4% ^a	4.0%	3.2% ^a	0.0% ^a
Asian female	Separations	2000	2.4%	2.9% ^b	2010	0.5%	3.5% ^b
	OCC wrk. part. %	OCLF	2.6% ^a	2.6% ^a	OCLF	2.9% ^a	2.7% ^a
	Hires	6.9%	5.6% ^a	6.8% ^a	8.7% 2010 OCLF	7 .8% ^a	9.6%
Black female	Separations	0.9% 2000 OCLF	6.3% ^b	5.9%		5.8%	5.2%
	OCC wrk. part. %		5.9% ^a	6.0% ^a		6.3% ^a	6.6% ^a
	Hires	1.6%	1.1% ^a	2.4%	3.7% 2010 OCLF	2.1% ^a	2.2% ^a
Hispanic female	Separations	2000	3.4% ^b	2.0%		2.7% ^b	3.0% ^b
	OCC wrk. part. %	OCLF	2.4%	2.5%		2.5% ^a	2.4% ^a
Native	Hires	0.2%	0.0% ^a	0.0% ^a	0.3% 2010 OCLF	0.0% ^a	0.0% ^a
American	Separations	2000	0.0%	0.0%		0.5%	0.4%
female	OCC wrk. part. %	OCLF	0.4%	0.4%		0.5%	0.4%
	Hires	30.3%	29.2% ^a	23.2% ^a	28.3% 2010 OCLF	21.6% ^a	20.6% ^a
White female	Separations	2000	20.5%	21.1%		25.0%	28.0% ^b
	OCC wrk. part. %	OCLF	26.9% ^a	26.9% ^a		26.7% ^a	26.2% ^a

Table 3: Female Bank Examiner Profile by EEO Groups, Four-Year Trend

Source: MD-715 workforce data table as of October 4, 2014.

^a Female bank examiner workforce participation and hiring rates below the 2000 and 2010 bank examiner OCLF.

^b Female bank examiner separation rate above their workforce participation rate.

Table 4: Individuals With Targeted Disabilities, Four-Year Trend

		FY 2011	FY 2012	FY 2013	FY 2014
Individuals with targeted disabilities (Treasury goal: 2%)	Hires	0.0% ^a	0.0% ^a	0.2% ^a	0.9% ^a
	Separations	1.0% ^b	0.6% ^b	0.4% ^b	0.0%
	OCC wrk. part. %	0.4% ^a	0.3% ^a	0.3% ^a	0.3% ^a

Source: MD-715 workforce data table as of October 4, 2014

^aWorkforce participation and hiring rates below Treasury Department's goal.

^b Separation rate above their workforce participation rate.

	FY 2	013	FY 2		
	OCC workforce participation	OCC supervisor participation	OCC workforce participation	OCC supervisor participation	Supervisor participation percentage point change from FY 2013 to FY 2014
Male	54.4%	62.6%	54.9%	60.9%	-1.7
Female	45.6%	37.4% ^a	45.1%	39.1% ^a	+1.7
Minority male	13.9%	11.9% ^a	14.3%	12.3% ^a	+0.4
Minority female	18.2%	12.0% ^a	18.1%	12.3% ^a	+0.3
Minority	32.1%	23.9% ^a	32.4%	24.6% ^a	+0.7
Asian	7.4%	6.0% ^a	7.7%	7.1% ^a	+1.1
Black	16.7%	10.5% ^a	16.7%	10.5% ^a	-
Hispanic	6.6%	7.0%	6.6%	6.5% ^a	-0.5
Native American	1.0%	0.3% ^a	0.9%	0.3% ^a	-
White	67.9%	76.5%	67.6%	75.4%	-1.1
White male	40.5%	51.3%	40.6%	48.6%	-2.7
White female	27.4%	25.2% ^a	27.0%	26.8% ^a	+1.6
Total	3,919	313	3,837	325	

Table 5: OCC Participation in Supervisor Positions by EEO Groups, Fiscal Years 2013 to 2014

Source: OCC HR Data Mart as of October 4, 2014.

^a EEO groups participating at rates below their workforce participation rates.

Table 6: OCC Participation in SLPs by EEO Groups, Fiscal Years 2013 to 2014

	FY 2	2013	FY 2	2014	
	OCC workforce participation	NB VIII-IX (equiv. SLP)	OCC workforce participation	NB VIII-IX (equiv. SLP)	SLP participation percentage point change from FY 2013 to FY 2014
Male	54.4%	67.4%	54.9%	67.3%	-0.1
Female	45.6%	32.6% ^a	45.1%	32.7% ^a	+0.1
Minority male	13.9%	10.2% ^a	14.3%	11.5% ^a	+1.3
Minority female	18.2%	4.1% ^a	18.1%	3.8% ^a	-0.3
Minority	32.1%	14.2% ^a	32.4%	15.3% ^a	+1.1
Asian	7.4%	0.0% ^a	7.7%	1.9% ^a	+1.9
Black	16.7%	12.2% ^a	16.7%	11.5% ^a	-0.7
Hispanic	6.6%	2.0% ^a	6.6%	1.9% ^a	-0.1
Native American	1.0%	0.0% ^a	0.9%	0.0% ^a	_
White	67.9%	85.7%	67.6%	84.7%	-1.0
White male	40.5%	57.1%	40.6%	55.8%	-1.3
White female	27.4%	28.6%	27.0%	28.9%	+0.3
Total	3,919	49	3,837	52	

Source: OCC HR Data Mart as of October 4, 2014.

^a EEO groups participating at rates below the workforce participation rates.