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

# **MD-715 Summary Report**

Fiscal Year 2017 Accomplishments and Fiscal Year 2018 Plans

## Introduction

The Office of the Comptroller of the Currency (OCC) is required by Congress and the Equal Employment Opportunity Commission's (EEOC) 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 2017 accomplishments and fiscal year 2018 plans.

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 fully committed to using and retaining employees' skills, 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 focuses on leadership commitment, recruitment, development, retention, work/life balance, and an engaging culture.

As of September 30, 2017, the OCC's permanent workforce totaled 3,930 employees, a decline of 0.7 percentage point from the 3,958 permanent employees at the end of fiscal year 2016. The participation rate of females (currently 45.0 percent) in the OCC's workforce has remained fairly stable since fiscal year 2013, with a 0.6 percentage point decrease. Minority participation increased from fiscal year 2013 by 2.6 percentage points to 34.7 percent in fiscal year 2017. At the end of fiscal year 2017, all major EEO groups were at or near parity with the 2010 national civilian labor force (NCLF) rates,<sup>1</sup> with the exception of females and Hispanics. See table 1, "OCC Workforce Profile, Five-Year Trend."

The U.S. Department of the Treasury, Office of Civil Rights and Diversity provided a more meaningful benchmark comparison for the OCC's overall workforce, identified as the relevant civilian labor force (RCLF) rate. This customized RCLF rate is calculated annually based on the OCC's occupational composition and total workforce. The 2017 RCLF was calculated by comparing the occupational civilian labor force (OCLF) availability rate from the 2010 census

<sup>&</sup>lt;sup>1</sup> 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. The OCC's workforce demographics benchmark comparisons are made against the 2010 NCLF availability rates and the occupational CLF availability rates for the OCC's three major occupational groups—bank examiners, attorneys, and economists.

data with the percentage availability rate of each occupation represented in the OCC's workforce as of September 30, 2017.

Hispanic participation rates are below parity in the following occupational positions economists, bank examiners (females), and "all other series." Similarly, females across EEO groups in bank examiner positions participated below their OCLF rates, and White females in economist (16.3 percent at the OCC versus 25.2 percent OCLF rate) and "all other series" positions (26.6 percent at the OCC versus 34.0 percent NCLF rate) participated below their respective OCLF and NCLF rates. See table 2, "OCC Workforce Profile as of September 30, 2017," and table 6, "OCC Female Bank Examiner Profile by EEO Groups, Five-Year Trend." In addition, the OCC continued to focus on the low participation rates of females and minorities in supervisor roles and senior-level positions (SLP). See table 8, "OCC Participation in Supervisor Positions by EEO Groups, FY 2016 and FY 2017," and table 9, "OCC Participation in SLPs by EEO Groups, FY 2016 and FY 2017."

Over the last five years, the OCC's hiring rates for Asians, Blacks, and males have consistently been above their NCLF rates. Comparatively, hiring rates for females, Hispanics, Small Ethnicity and Race Indicator (ERI) groups,<sup>2</sup> and Whites have been below their NCLF rates. See table 3, "OCC Hires, Five-Year Trend."

In four of the last five years including fiscal year 2017, females, Asians, and Blacks separated below their average workforce participation rates. In comparison, males and Whites separated consistently above their average workforce participation rates. There were 283 separations in fiscal year 2017, a 1.7 percentage point decrease from fiscal year 2016. See table 4, "OCC Separations, Five-Year Trend."

In fiscal year 2017, the OCC focused on 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.
- Increasing the number of reasonable accommodation (RA) requests processed within the agency's procedures.

<sup>&</sup>lt;sup>2</sup> Small ERI groups are Native Americans, Native Hawaiians, and persons of two or more races combined.

## Areas of Focus in Detail

#### **Hispanic Employees**

In fiscal year 2017, the OCC continued to address the low participation rate of Hispanics in its workforce. The OCC slightly increased its Hispanic participation rate to 7.0 percent from 6.9 percent in fiscal year 2016; this increase was a 0.4 percentage point improvement over the fiscal year 2013 rate of 6.6 percent. Even though the agency has made progress in the last five years, the OCC's Hispanic workforce participation rate (7.0 percent) remains below the NCLF rate of 10.0 percent. When compared with the RCLF rate (7.3 percent), Hispanic participation overall was below parity by 0.3 percentage points in fiscal year 2017 (males, 3.7 percent versus 2.6 percent; and females, 3.3 percent versus 4.7 percent). Hispanics were hired at 9.6 percent in fiscal year 2017, above their hiring rates during the five-year period.

Hispanics participated above the OCLF in the attorney occupation (6.7 percent versus 4.3 percent), and Hispanic males participated above the OCLF in the bank examiner occupation (4.0 percent versus 3.1 percent). In fiscal year 2017, Hispanic bank examiners were hired at rates exceeding their OCLF rates. There were no Hispanic economists or attorneys hired in fiscal year 2017. Hispanic male bank examiners separated at a higher rate than their participation in the workforce (4.6 percent versus 4.0 percent). However, the turnover rate of both male and female Hispanic examiners combined actually decreased from 10.5 percent in fiscal year 2016 to 6.1 percent in fiscal year 2017. The turnover rate of Hispanic male attorneys increased from 0.0 percent in fiscal year 2016 to 16.7 percent in fiscal year 2017; there were no Hispanic female attorney separations. The OCC had no separations of Hispanic economists in fiscal year 2017.

The low workforce participation rate of Hispanics is largely influenced by low participation in the OCC's non-major occupational groups, "all other series" (7.5 percent versus 10.0 percent NCLF rate). Hispanic participation in the "all other series" has decreased slightly since fiscal year 2016 (7.7 percent). Four Hispanics (6.7 percent) were hired in "all other series" in fiscal year 2017, below the 10.0 percent NCLF rate, and a decrease from the fiscal year 2016 hiring rate of 9.3 percent. Hispanics in "all other series" separated at 7.8 percent, above their workforce participation rate of 7.5 percent in fiscal year 2017 and the fiscal year 2016 separation rate of 5.9 percent. See table 5, "OCC Hispanic Profile by Occupational Positions, Five-Year Trend."

The OCC conducted an applicant flow data analysis of the entry-level bank examiner recruitment process for the Midsize and Community Bank Supervision (MCBS) and Large Bank Supervision (LBS) recruitment campaigns in 2017. The combined applicant pool rate for Hispanics who self-identified on average was 12.4 percent, with a hiring rate of 11.4 percent. The applicant pools and hiring rate in the fiscal year 2017 recruitment campaigns exceeded the Hispanic examiner OCLF of 6.8 percent.

In addition, the OCC conducted a preliminary applicant flow data analysis on job vacancies processed by the OCC and closed in fiscal year 2017 during the first three quarters, by gender, ethnicity (Hispanic and non-Hispanics), and a combination of gender and ethnicity. The applicant pool rate for Hispanics who self-identified was 12.4 percent, above the NCLF rate of 10.0 percent and the RCLF rate of 7.3 percent. However, the selection rate for Hispanics of 7.0

percent was below the NCLF rate (10.0 percent) and the RCLF rate (7.3 percent). Preliminary results indicated Hispanic applicants did not progress through the hiring decision process like non-Hispanic applicants. This preliminary finding will be studied more in fiscal year 2018, particularly as all the data becomes available. Efforts are underway to establish regular monitoring and analyses of applicant flow data.

The OCC maintains ongoing relationships with minority professional organizations and colleges and universities with large populations of minority and female students. The OCC hired 12 students through the federal Pathways Internship Program, of whom 8.3 percent were Hispanic. In addition, the agency contracted for 28 interns<sup>3</sup> through its National Diversity Internship Program in fiscal year 2017.

In fiscal year 2017, the OCC continued to benefit from its Hispanic employee network group (ENG), the Hispanic Organization for Leadership and Advancement (HOLA). HOLA members served as recruiters/screeners and interview panelists during the entry-level bank examiner and attorney recruitment campaigns and participated in the recruitment and screening process for experienced/industry hires. HOLA members also represented the agency at career forums and fairs and networking events. To support retention, HOLA continued the Discipline Champions Cadre to encourage networking, mentoring, and collaboration among its members.

In fiscal year 2018, the OCC will continue 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 will also continue to partner with HOLA to foster retention and developmental programs.

## **Female Bank Examiners**

In fiscal year 2017, the workforce participation rate of female bank examiners increased slightly to 38.9 percent from 38.7 percent in fiscal year 2016, below the OCLF rate of 45.3 percent. The hiring rate (37.1 percent) of female bank examiners was below their OCLF rate (45.3 percent), but greater than the fiscal year 2016 hiring rate (34.4 percent). See table 6, "OCC Female Bank Examiner Profile by EEO Groups, Five-Year Trend." The OCC's hires also included 155 entry-level bank examiners in fiscal year 2017, of whom 40.6 percent were females, a greater percentage than in fiscal year 2016 (33.9 percent). In addition, OCC district offices hired 11 financial interns in fiscal year 2017, of whom 72.7 percent were females.

The OCC conducted an applicant flow data analysis on examiner vacancies that closed during the first three quarters of FY 2017. The analysis showed females were 35.6 percent of the applicant pool and 40.5 percent of the selections, both below the OCLF rate (45.3 percent). In addition, an applicant flow analysis of the 2017 entry-level recruitment campaigns showed females, on average, represented 34.5 percent of the applicant pools; females were hired at a rate of 38.9 percent, but below the OCLF rate (45.3 percent). There was no evidence of a statistically

<sup>&</sup>lt;sup>3</sup> These contracted interns were not OCC employees and are not reflected in the workforce count; therefore, no demographic data are available.

significant shift in the gender composition of the applicant pool as females progressed through the various stages of the decision process.

In fiscal year 2017, female bank examiners separated at a rate (35.1 percent) below their workforce participation rate (38.9 percent), hiring rate (37.1 percent), and their rate of separation in fiscal year 2016 (37.3 percent). Resignations and transfers to other Treasury bureaus accounted for 51.5 percent of separating female bank examiners in fiscal year 2017, and retirements accounted for 42.7 percent.

In fiscal year 2017, the retirement eligibility pool (employees currently eligible and those expected to obtain eligibility within five years) for female bank examiners was 30.2 percent, the lowest retirement eligibility rate since fiscal year 2011, compared with an average of 30.9 percent over the past five years. Given the years of historical growth in the retirement eligibility pool before fiscal year 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. Separating female bank examiners most frequently cited job stress, travel requirements, workload, and office morale as the reasons for separation in the fiscal year 2017 exit survey responses.

Efforts to identify and address barriers to the hiring and retaining of female bank examiners include continued partnership among the OCC's Office of Minority and Women Inclusion (OMWI), Office of Human Capital (HC), and bank supervision management on targeted recruitment and retention. Efforts include enhancing current recruitment processes and sources for entry-level and experienced female bank examiners; advertising with targeted professional organizations for specialty skills; and partnering with the Women's Network (TWN) to sponsor mentoring and networking activities to support female bank examiner retention. In fiscal year 2017, TWN conducted an analysis of OCC survey responses by females; sponsored six focus groups addressing career development, work/life balance, and the OCC's culture; and held mentoring circles on relevant topics like "Career Exploration at the OCC," "Work/Life Balance," "Uniform Commission Examination (UCE) Preparation," and "Leadership at the OCC"; and held a teleconference focusing on work/life balance, "OCC Leadership on Taking Control and Achieving Balance."

Bank Supervision management sponsors focus group sessions with entry-level bank examiners to capture their feedback on the agency's hiring and on-boarding processes, training programs, on-the-job experiences their first year, and OCC examiner culture. Feedback is shared with the appropriate business lines, along with Bank Supervision management, to improve their training teams and new examiner development processes. In FY 2017, 15 survey and focus group sessions were conducted, and approximately 14 sessions are planned for FY 2018.

In addition, the OCC's annual Career Forum provided pay band NB-IV examiners, at the end of their third year of employment, information about career opportunities and the UCE preparatory processes. Of the 79 OCC pre-commissioned examiners who successfully passed the UCE in fiscal year 2017, 26.6 percent were females, down from 40.7 percent in fiscal year 2016. The OCC also provided separate career forums designed for examiners in pay band NB-V who received their commissions in 2014. The main focus of the forum is to provide bank examiners

with exposure to the career choices available in bank supervision, resources and factors to consider when making career decisions, and a chance to network with senior leaders throughout the agency.

The EXCEL I Program provides NB-V bank examiners with the opportunity to develop expertise in one of eight specialty areas. In FY 2017, two male bank examiners were selected for an EXCEL I class. Low program participation this year was because of unexpected cancellation of classes and a delay in the fall class cycle. Also, LeaderTRACK is designed to build and maintain a pipeline of qualified employees to meet future bank supervision leadership needs. In FY 2017, five new employees were added to the LeaderTRACK program, of whom one was female.

## **Individuals With Disabilities**

In fiscal year 2017, the workforce participation rate of individuals with disabilities increased to 8.3 percent from 6.2 percent in fiscal year 2016, but remained below the Treasury Department's goal of 10.0 percent and the EEOC goal of 12.0 percent. The OCC hired 15 individuals with disabilities in fiscal year 2017, representing 6.3 percent of the hires, below the Treasury Department and EEOC goals (10.0 percent and 12.0 percent, respectively), their workforce participation rate (8.3 percent), and the fiscal year 2016 hiring rate (11.5 percent).

The separation rate (8.5 percent) of individuals with disabilities was above their participation rate in the workforce (8.3 percent) in fiscal year 2017 and above the fiscal year 2016 separation rate (7.3 percent).

The participation rate of individuals with targeted disabilities increased in fiscal year 2017 to 2.0 percent, from 0.5 percent in fiscal year 2016. The OCC hired three individuals with targeted disabilities in fiscal year 2017, representing 1.3 percent of the hires, below the workforce participation rate (2.0 percent), the fiscal year 2016 hiring rate (1.6 percent), and the Treasury Department and EEOC goals of 2.0 percent each. There were no individuals with targeted disabilities in the 2017 entry-level bank examiner recruitment campaign; therefore applicant flow data/analysis is not available. Of the OCC's staff with targeted disabilities, 49.4 percent were bank examiners. See table 7, "OCC Individuals With Targeted Disabilities, Five-Year Trend."

Increases in the number and percentages of individuals with disabilities and targeted disabilities in the OCC's workforce are a direct result of the changes made in fiscal year 2017 to the regulations governing individuals with disabilities in the federal government. These changes included Office of Personnel Management's (OPM) reclassification of disability and targeted disability codes listed on its SF-256, the new EEOC regulation allowing agencies to count veterans with certain disabilities in their workforce disability count, and resurveying the OCC's workforce.

The OCC sponsored a "Voluntary Self-Identification of Disability" campaign in conjunction with the Treasury Department. Employees were encouraged to self-identify their disabilities or serious health conditions in OCC's Human Resources (HR) data information system, Human Resources Connect, using the codes listed on the OPM SF-256. Information promoting the

campaign was published in the agency's online newsletters, "What's New at the OCC" and "What's New at HQ," and on the OCC's intranet site under various HC topics and subtopics.

In addition, the OCC enhanced 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. Additionally, the agency instituted a virtual classroom facilitation coaching process to equip OCC instructors and virtual class producers with appropriate knowledge and skills for facilitating training and development sessions in virtual environments for diverse groups of learners, including those with disabilities.

## Females and Minorities in Supervisor Roles and SLPs

In fiscal year 2017, females represented 45.0 percent of the OCC workforce and held 38.3 percent of supervisor positions <sup>4</sup> and 31.0 percent of SLP,<sup>5</sup> up from fiscal year 2016 participation rates by 0.6 percentage points and 1.7 percentage points, respectively. Minorities participated in the workforce at 34.7 percent and held 25.2 percent of supervisor positions and 20.7 percent of SLP, up from fiscal year 2016 participation rates by 1.3 percentage points and 3.5 percentage points, respectively. See table 8, "OCC Participation in Supervisor Positions by EEO Groups, FY 2016 and FY 2017," and table 9, "OCC Participation in SLPs by EEO Groups, FY 2016 and FY 2017."

In fiscal year 2016, the OMWI sponsored the Diversity and Development Working Group, a cross-functional team of OCC employees established to perform a barrier analysis to improve diversity and promote inclusion in SLP and their pipeline positions. The group presented their findings in a white paper titled "Expanding Opportunities in Executive Leadership: Increasing Women and Minorities in Senior-Level Positions." The recommendations of the working group were approved by senior management and implementation efforts began and continued through fiscal year 2017. Partnerships with the Leadership, Executive, and Organizational Development (LEOD) office and the Enterprise Workforce Planning (EWP) team resulted in the recognition of similar goals and shared initiatives. These groups collaborated to ensure the integration of the SLP actions into the LEOD and EWP plans. Through this partnership, the goals and initiatives of the working group's SLP plan have been elevated and integrated into agency-wide efforts.

The OCC continued to work on its goals and objectives for leadership development, designed to create a systematic and sustainable process for succession management that ensures continuity, development, and diversity of leadership at all levels of the organization. The Leadership, Developmental Advisory Board (LDAB), of which the Executive Director of OMWI is a member, remained focused on providing leadership, guidance, and governance for agency leadership development efforts. In fiscal year 2017, the OCC established the Leadership Institute, a virtual university that provides the framework, curriculum, and programs for

<sup>&</sup>lt;sup>4</sup> Supervisor roles and positions are those that require the exercise of supervisory or managerial responsibilities as set forth in Office of Personnel Management directives, OCC classification guidance, and other related directives.

<sup>&</sup>lt;sup>5</sup> Employees in pay band NB-VIII and NB-IX positions are equivalent to Senior Executive Service positions in the General Schedule.

systematically developing the OCC's leadership pipeline, fostering a leadership culture, and supporting the career development goals of employees. A virtual Career Development Center was created, the Coaching Program was expanded to include more managers, and new leadership courses were launched including a Women in Leadership course. The OCC continued to sponsor the Leadership Institute Speaker's Series and hold informational Manager Forums to educate managers on various leadership development topics.

The OCC continued to develop its Executive Coaching Program to help leaders align vision, actions, and performance and address tactical issues and strategic long-term opportunities. In fiscal year 2017, females and minorities in the SLP participated in the OCC Executive Coaching Program at 46.2 percent and 26.0 percent, respectively. In fiscal year 2018, the OCC plans to conduct a Succession Planning Program review and launch a formal Leadership Development Program.

In addition, the OMWI began a Hispanic barrier analysis study with a review of its workforce data, specifically of Hispanic participation in NB-V through NB-IX positions (GS-13 through SES equivalent). The mandated barrier analysis is in compliance with the requirement set forth in the EEOC and OPM's memorandum of January 18, 2017, regarding Hispanics in the federal workforce.

## **Alternative Dispute Resolution (ADR)**

The Treasury Department's goal is to process at least 45.0 percent of completed EEO precomplaints<sup>6</sup> using ADR in lieu of traditional EEO counseling. The OCC continued to promote its ADR program as an alternative means of resolution and made its ADR Policy Statement available to all staff on the OCC's intranet site; held mandatory training for new employee hires and new managers and supervisors; provided daily tips regarding ADR on the Headquarters electronic bulletin boards and through announcements in "What's New at the OCC" on the intranet site; and featured ADR as a module in the No FEAR Act training.

In fiscal year 2017, the OCC's ADR participation rate increased to 44.1 percent of EEO pre-complaints from 30.8 percent in fiscal year 2016. Of the completed cases in fiscal year 2017, 20.6 percent were ineligible for ADR based on the OCC's ADR policy. The OCC does not offer ADR for pre-complaints involving non-selection of an external applicant, termination, criminal activity, fraud, waste, or abuse. In fiscal year 2018, the agency will highlight ADR in a revised No FEAR Act Training module, continue to evaluate how to remove potential barriers to ADR, and analyze cases in which ADR was not used.

<sup>&</sup>lt;sup>6</sup> A pre-complaint, also referred to as an informal complaint, is the first stage of an EEO complaint. Counseling occurs during the pre-complaint stage, while the complaint remains internal to the OCC. It precedes a formal complaint, which is external to the OCC.

#### **Reasonable Accommodation (RA)**

In fiscal year 2017, the OCC conducted a formal review of its RA Program and developed an action plan to address identified deficiencies. Some of the actions implemented in fiscal year 2017 included conducting several RA awareness training sessions for manager groups across the agency, and a briefing with management officials and National Treasury Employees Union representatives on changes to the RA program. The OCC also modified its process and method for calculating the amount of time to process an RA and a workplace solutions request.

In fiscal year 2018, the agency will continue to train managers on the RA program, and on key changes made to the RA Policies and Procedures Manual updated in February 2018.

## Model Equal Employment Opportunity and Diversity Program Elements

## **Commitment and Integration of EEO**

On August 28, 2017, Acting Comptroller Keith A. Noreika issued the agency's annual EEO policy statement, reiterating the OCC's commitment to EEO, diversity, and maintaining a workplace free of harassment and retaliation. The agency's OMWI Executive Director meets regularly with the Comptroller and routinely reviews EEO and diversity issues with the Human Capital Subcommittee of the Executive Committee (EC).

Senior managers receive Business Unit Diversity Reviews, which cover retirement patterns; recruitment and hiring; training and career development; leadership and management development; and retention initiatives and programs. Moreover, the MD-715 report is reviewed annually with the Comptroller after review and input from EC members.

The OCC has 11 full-time EEO and diversity staff members. The agency has seven ENGs: HOLA, TWN, the Network of Asian Pacific Americans, the Coalition of African American Regulatory Employees, PRIDE (the gay, lesbian, transgender, and bisexual employees network group), Generational Crossroads, and the newly established Veterans Employee Network. The ENGs serve as a collective voice in communicating workplace concerns and providing input to management regarding diversity and inclusion programs and activities within the OCC, as well as a way to promote awareness of and participation in OCC programs that support diversity.

The OCC also has allocated sufficient resources to train all employees on the EEO/Diversity and Inclusion Program. Some of the agency's efforts in fiscal year 2017 included providing EEO, ADR, and diversity and inclusion training during new hire orientations, and training for new managers and supervisors.

Collectively, the sessions provided training on an array of issues: managing and participating in a diverse work environment; discrimination, including workplace harassment; generational diversity; ADR; and conflict resolution tools and Diversity Dialogue sessions. The OCC conducted 11 Diversity Dialogues with more than 300 employees and 20 supervisors/managers in different offices in the districts and field locations.

In fiscal year 2017, the OCC launched the leadership course piloted in fiscal year 2016, "Leveraging Diversity & Creating an Inclusive Work Environment," specifically tailored for managers and rating officials. The course was designed to explore the impact of unconscious bias and leveraging diversity and inclusion in hiring, promotions, performance management, and succession management.

The OCC offers more than 60 career development training courses for employees to acquire the competencies, skills, and knowledge for their continual learning and career development. In fiscal year 2017, 2,068 employees participated in these courses, representing over half of the agency's workforce. All groups, except Hispanics, participated in the training courses at rates generally below their workforce participation rates, but near or above each group's training participation rate in fiscal year 2016. See table 10, "OCC Career Development Training, Four-Year Trend." In addition to skills training, 2,020 employees received diversity and EEO training, not including the No FEAR Act Training required every two years. See table 11, "OCC Diversity and EEO Training, Four-Year Trend."

The OCC also offered 12 leadership courses to prepare employees across the agency for formal leadership or to enhance their current leadership capabilities. In fiscal year 2017, 1,423 employees participated in these courses. All groups, except females and Hispanics, participated in the leadership courses at rates below their workforce participation rates. In addition, all groups, except Hispanics, participated above each group's rate of participation in fiscal year 2016.

In fiscal year 2017, OCC managers and supervisors participated in four agency-sponsored Manager Forums (574 attendees/occurrences) through audio/video/phone conferences on various topics of interest; over 1,600 employees viewed Leadership Channel Videos through the HC training and development organization, and over 300 employees attended the Leadership Institute Speaker Event, "Agility Shift." In addition, 43 employees participated in the newly established virtual Career Forum Series, designed to provide employees with opportunities to learn how to identify their ideal career fit, and much more. The OCC also revamped its Individual Development Plan (IDP) process, and streamlined and enhanced its online IDP tool. For the first time, the OCC was able to capture data to identify gaps in leadership competencies for the enterprise. The OCC hosted a two-day conference for all OCC managers in April 2017. The conference theme "Leading Change and Innovation: Our Currency for the Future" focused on strengthening competencies in the area of leadership and change management.

Also, in fiscal year 2017, the OCC designed a career development course, Career Power, to replace the non-examiner career forum series for administrative professionals, as well as for a broader audience, to provide employees with the knowledge and tools to manage their own careers within the OCC. There were 37 participants who attended the course in fiscal year 2017.

The ENGs are collaborating with LEOD, the U.S. Office of Management and Budget (OMB) and OPM in a One-on-One Mentoring Pilot Program utilizing OMB's "Mentoring Hub"—a virtual platform for matching mentors and mentees. The six-month pilot began in early September 2017, with the mentor/mentee matching process for approximately 25 OCC

mentor/mentee pairs. A mid-point review of the program was conducted and a full assessment will be performed at its conclusion. The OCC plans to continue its partnership with OMB and use of the Mentoring Hub for fiscal year 2018 to expand the quantity of OCC employees participating in one-on-one mentoring.

The OCC continued to improve the alignment of its retention, recruitment, and training programs with agency needs by a strategic focus on enhancing the efficiency and effectiveness of its recruitment and development programs, addressing skill gaps through targeted hiring and staff development, generating deeper external applicant pools, and enhancing the agency's ability to retain critical skills within the workforce. Through the Leadership Institute, the OCC established a systematic and sustainable process for evaluating and developing the agency's leadership pipeline to ensure continuity and diversity of leadership. An enterprise-wide approach to workforce planning was developed that will help identify short- and long-term evolving needs, such as resources and skill sets, to support OCC future needs.

In fiscal year 2017, the OCC simplified its employee engagement process while still maintaining its commitment to promoting engagement and ensuring the OCC is a great place to work. Employees expressed concern about the number of surveys, the formal action planning process, and the timeliness of efforts to respond to issues identified in the surveys. In response, the OCC discontinued the OCC engagement survey in favor of the OPM-administered Federal Employee Viewpoint Survey (FEVS) and redefined its follow-up action planning process to emphasize continuous dialogue and continuous engagement. The action planning process moved from being an annual, survey-focused event to promoting engagement as a multi-year progression of continuous dialogue about those matters that affect our employees' work experiences.

## Accountability

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

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. The OCC is undertaking a comprehensive review and redesign of its performance management system, including the performance appraisal process. The project team has completed a best practices review, an evaluation of the current system, and a comprehensive job analysis to develop new, validated performance appraisal criteria. Recommendations for new performance management and appraisal processes are being developed. All new managers and supervisors are required to complete a four-and-a-half-day "Human Capital Fundamentals for New Managers" course, which includes a review of their responsibilities in creating and managing a diverse workforce, upholding the principles of EEO and ADR, and responding to requests for RA. Written EEO materials and related policies and procedures are posted on the OCC's intranet and in prominent locations at OCC Headquarters, district offices, and field offices. All new employees take the mandatory No FEAR Act training within 60 days of their hire date, and all employees are required to complete the training every two years.

The performance plans of all OCC managers include an element on EEO that focuses on the managers' ability to establish and maintain a nondiscriminatory 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 EEO element.

The OCC used an online exit survey to gauge the demographic profile of all employees voluntarily separating from the agency, their overall work experience, and reasons for leaving. Of the 109 respondents in fiscal year 2017, 90.8 percent were positive about their OCC work experience, 78.9 percent would work for the OCC again, and 89.9 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 workforce profiles as a whole.

In 2017, the OCC participated in the OPM's annual FEVS to measure employees' views on topics pertaining to diversity, family-friendly culture, leadership, pay, teamwork, and training and development. More than 2,800 OCC employees completed the survey, a 76.4 percent response rate. OCC employees' ratings were more favorable in all major categories than those of respondents in the federal government and the Treasury Department. OCC employees responded most favorably to questions in the categories for work/life, supervisors, and work experience. The OCC's diversity and inclusion index rating increased 7.0 percentage points to 69.0 percent and a "Good" overall ranking, and the agency's index rating remained higher than that of the Treasury Department (62.0 percent) and the federal government overall (60.0 percent).

## **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 a fair and efficient process for resolving disputes in the workplace and has a system for evaluating the effectiveness of its complaint-processing program. In fiscal year 2017, the OCC processed all of its informal complaints in a timely manner. OCC analysis showed that the most common bases for EEO complaints were reprisal and race discrimination. The most common issues were performance feedback and non-sexual harassment.

## 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 EEO Manager's performance standards include responsibility for monitoring the agency's compliance with settlement agreements, final orders, and court orders. The OCC submitted all quarterly ADR reports and its annual "Statistical Report of Discrimination Complaints" in a timely manner. There were no findings of discrimination in fiscal year 2017 by EEOC. 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 2017 accomplishments and fiscal year 2018 plans that was submitted to the EEOC through coordination with the Treasury Department, under the EEOC's Management Directive 715.

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

	Male	Female	Minority	Asian	Black	Hispanic	Small ERI groups	White
FY 2013	54.4	45.6 <sup>a</sup>	32.1	7.4	16.7	6.6ª	1.4 <sup>a</sup>	67.9 <sup>a</sup>
FY 2014	54.9	45.1ª	32.4	7.7	16.8	6.6ª	1.3ª	67.6ª
FY 2015	54.9	45.1ª	33.1	7.8	17.2	6.8ª	1.4 <sup>a</sup>	66.9ª
FY 2016	54.8	45.2 <sup>a</sup>	34.2	8.4	17.6	6.9 <sup>a</sup>	1.3ª	65.8 <sup>a</sup>
FY 2017	55.0	45.0ª	34.7	8.6	17.7	7.0 <sup>a</sup>	1.4 <sup>a</sup>	65.4ª
2010 NCLF	51.9	48.1	27.7	3.9	12.0	10.0	1.6	72.3
Percentage point change from FY 2013 to FY 2017	+0.6	-0.6	+2.6	+1.2	+1.0	+0.4	-	-2.5

Table 1: OCC Workforce Profile, Five-Year Trend (by Percentage)

Source: MD-715 workforce data table as of September 30, 2017.

<sup>a</sup> EEO groups participating at rates below the 2010 or 2000 NCLF rates.

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
OCC workforce	3,930	55.0	45.0ª	8.6	17.7	7.0 <sup>a</sup>	1.4 <sup>a</sup>	65.4ª
2010 NCLF		51.9	48.1	3.9	12.0	10.0	1.8	72.3
2017 RCLF		42.1	57.9	4.7	9.2	7.3	1.4	77.4
Bank examiner	2,597	61.1	38.9ª	6.4 <sup>a</sup>	12.7	7.0	1.2	72.7
2010 bank examiner OCLF		54.7	45.3	7.7	12.3	6.8	0.9	72.4
Attorney	179	53.1ª	46.9	6.7	5.0	6.7	0.6 <sup>a</sup>	81.0ª
2010 attorney OCLF		66.7	33.3	3.6	4.7	4.3	0.9	86.4
Economist	98	65.3ª	34.7	36.7	3.1ª	4.1 <sup>a</sup>	0.0 <sup>a</sup>	56.1ª
2010 economist OCLF		67.1	32.9	7.6	5.5	5.1	0.9	81.0
All other series	1,056	39.1ª	60.9	11.5	33.5	7.5ª	2.0	45.4ª
2010 NCLF		51.9	48.1	3.9	12.0	10.0	1.8	72.3

Table 2: OCC Workforce Profile as of September 30, 2017 (by Percentage)

Source: MD-715 workforce data table as of September 30, 2017.

<sup>a</sup> EEO groups participating at rates below the 2010 NCLF or OCLF rates, or 2017 RCLF rate.

Table 3: OCC Hires, Five-Year Trend (by Percentage)

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
FY 2013	421	61.3	38.7 <sup>a</sup>	10.0	19.0	8.6ª	1.4 <sup>a</sup>	61.0ª
FY 2014	221	64.7	35.3ª	14.5	12.7	7.2ª	1.4 <sup>a</sup>	64.3ª
FY 2015	268	58.2	41.8ª	7.4	19.7	8.6ª	1.2ª	63.0ª
FY 2016	382	57.6	42.4 <sup>a</sup>	9.7	17.5	9.2ª	1.3ª	62.3ª
FY 2017	239	56.5	43.5ª	9.2	17.2	9.6ª	1.1 <sup>a</sup>	61.9ª
2010 NCLF		51.9	48.1	3.9	12.0	10.0	1.8	72.3

Source: MD-715 workforce data table as of September 30, 2017.

<sup>a</sup> EEO groups hired at rates below the 2010 NCLF rates.

Note: Small ERI groups are Native Americans, Native Hawaiians, and persons of two or more races combined.

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
FY 2013	265	61.1ª	38.9	6.0	16.2	5.3	1.5	71.0 <sup>a</sup>
FY 2014	318	55.7ª	44.3	8.5ª	11.3	7.5ª	2.2ª	70.4 <sup>a</sup>
FY 2015	303	56.4ª	43.6	5.9	14.5	6.5	2.0ª	71.0ª
FY 2016	288	59.0 <sup>a</sup>	41.0	4.9	11.8	7.6 <sup>a</sup>	0.7	75.0 <sup>a</sup>
FY 2017	283	55.8ª	44.2	7.4	17.0	6.7	1.8ª	67.1ª
Average OCC workforce participation rate		54.8	45.2	8.0	17.2	6.8	1.4	66.7

#### Table 4: OCC Separations, Five-Year Trend (by Percentage)

Source: MD-715 workforce data table as of September 30, 2017.

<sup>a</sup> EEO groups separated at rates above their average workforce participation rates.

			FY 2013	FY 2014	FY 2015	FY 2016	FY 2017
	Hires		7.8	7.4	10.2	8.7	11.4
Bank examiner	Separations	6.8 2010	4.8	9.1 <sup>b</sup>	6.2	8.6 <sup>b</sup>	5.7
	OCC workforce participation rate	OCLF	6.3ª	6.2ª	6.5ª	6.5ª	7.0
	Hires		0.0ª	20.0	0.0 <sup>a</sup>	25.0	0.0ª
Attorney	Separations	4.3 2010	0.0	11.1 <sup>b</sup>	7.1	0.0	25.0 <sup>b</sup>
	OCC workforce participation rate	OCLF	7.3	7.6	7.5	7.9	6.7
	Hires		20.0	14.3	0.0 <sup>a</sup>	7.7	0.0ª
Economist	Separations	5.1 2010	20.0 <sup>b</sup>	16.7 <sup>b</sup>	0.0	0.0	0.0
	OCC workforce participation rate	OCLF	4.4ª	4.2ª	4.0ª	4.3ª	4.1ª
	Hires		10.5	5.5ª	4.2 <sup>a</sup>	9.2ª	6.7ª
All other series	Separations	10.0 2010	6.4	1.4	7.6 <sup>b</sup>	5.9	7.8 <sup>b</sup>
All other series	OCC workforce participation rate	NCLF	7.4 <sup>a</sup>	7.7 <sup>a</sup>	7.5 <sup>a</sup>	7.7ª	7.5ª

Table 5: OCC Hispanic Profile by Occupational Positions, Five-Year Trend (by Percentage)

Source: MD-715 workforce data table as of September 30, 2017.

<sup>a</sup> Hispanic workforce participation and hiring rates below the relative 2010 NCLF or OCLF rates.

<sup>b</sup> Hispanic separation rates above their workforce participation rate.

Table 6: OCC Female Bank Examiner Profile by EEO Groups, Five-Year Trend (by Percentage)

			FY 2013	FY 2014	FY 2015	FY 2016	FY 2017
Female	Hires		35.1ª	32.4ª	38.1ª	34.4 <sup>a</sup>	37.1 <sup>a</sup>
	Separations	45.3 2010	35.1	40.5 <sup>b</sup>	34.0	37.3	35.1
	OCC workforce participation rate	OCLF	39.2ª	38.5ª	39.0ª	38.7ª	38.9ª
Asian female	Hires		3.2ª	0.0ª	2.5ª	4.7	1.8ª
	Separations	4.0 2010	0.5	3.5 <sup>b</sup>	3.1 <sup>b</sup>	2.4	2.6
	OCC workforce participation rate	OCLF	2.9ª	2.7ª	2.6ª	2.8ª	2.6ª
Black female	Hires		7.8ª	9.6	7.1ª	6.7ª	7.2ª
	Separations	8.7 2010	5.8	5.2	7.2 <sup>b</sup>	5.7	8.3 <sup>b</sup>
	OCC workforce participation rate	OCLF	6.3ª	6.6ª	6.7ª	6.8ª	6.7ª
Hispanic female	Hires		2.1ª	2.2ª	4.6	3.2ª	3.6ª
	Separations	3.7 2010	2.7 <sup>b</sup>	3.0 <sup>b</sup>	1.0	2.9 <sup>b</sup>	1.0
	OCC workforce participation rate	OCLF	2.5ª	2.4ª	2.7ª	2.7ª	2.9ª
Native American female	Hires		0.0 <sup>a</sup>	0.0 <sup>a</sup>	0.5	0.0 <sup>a</sup>	1.2
Temale	Separations	0.3 2010	0.5	0.4	0.0	0.5 <sup>b</sup>	0.5
	OCC workforce participation rate	OCLF	0.5	0.4	0.5	0.4	0.6
White female	Hires		21.6ª	20.6ª	23.3ª	19.8ª	23.4 <sup>a</sup>
	Separations	28.3 2010	25.0	28.0 <sup>b</sup>	22.2	25.8	22.7
	OCC workforce participation rate	OCLF	26.7ª	26.2ª	26.3ª	25.8ª	26.0ª

Source: MD-715 workforce data table as of September 30, 2017.

<sup>a</sup> Female bank examiner workforce participation and hiring rates below the 2010 bank examiner OCLF rates.

<sup>b</sup> Female bank examiner separation rates above their workforce participation rates.

Table 7: OCC Individuals With Targeted	Disabilities, Five-Year	Trend (by Percentage)
		nona (by roroontago)

		FY 2013	FY 2014	FY 2015	FY 2016	FY 2017
Individuals with targeted disabilities	Hires	0.2ª	0.9 <sup>a</sup>	0.7 <sup>a</sup>	1.6ª	1.3ª
(Treasury goal: 2%)	Separations	0.4 <sup>b</sup>	0.0	0.0	0.4	1.4
	OCC workforce participation rate	0.3ª	0.3ª	0.4ª	0.5ª	2.0

Source: MD-715 workforce data table as of September 30, 2017.

<sup>a</sup>Workforce participation and hiring rates below Treasury Department's goal.

<sup>b</sup> Separation rates above the workforce participation rate.

	FY	2016	FY 2	2017	
	OCC workforce participation	OCC supervisor participation	OCC workforce participation	OCC supervisor participation	Supervisor participation percentage point change from FY 2016 to FY 2017
Male	54.8	62.3	55.0	61.7	-0.6
Female	45.2	37.7 <sup>a</sup>	45.0	38.3 <sup>a</sup>	+0.6
Minority	34.2	23.9 <sup>a</sup>	34.7	25.2ª	+1.3
Minority male	15.6	12.8 <sup>ª</sup>	16.0	13.3ª	+0.5
Minority female	18.6	11.1 <sup>a</sup>	18.7	11.9 <sup>a</sup>	+0.8
Asian	8.4	7.4 <sup>a</sup>	8.6	7.7 <sup>a</sup>	+0.3
Black	17.6	10.8 <sup>a</sup>	17.7	10.6ª	-0.2
Hispanic	6.9	5.2 <sup>a</sup>	7.0	5.7 <sup>a</sup>	+0.5
Small ERI groups	1.3	0.5 <sup>a</sup>	1.4	1.2 <sup>a</sup>	+0.7
White	65.8	76.1	65.4	74.8	-1.3
White male	39.2	49.5	39.0	48.4	-1.1
White female	26.6	26.6	26.4	26.4	-0.2
Total number	3,958	406	3,930	405	

#### Table 8: OCC Participation in Supervisor Positions by EEO Groups, FY 2016 and FY 2017 (by Percentage)

Source: OCC HR Data Mart as of September 30, 2017.

<sup>a</sup> EEO groups participating at rates below their workforce participation rates.

	FY 20	)16	FY 20	)17	
	OCC workforce participation	NB VIII–IX (equiv. SLP)	OCC workforce participation	NB VIII–IX (equiv. SLP)	SLP participation percentage point change from FY 2016 to FY 2017
Male	54.8	70.7	55.0	69.0	-1.7
Female	45.2	29.3 <sup>ª</sup>	45.0	31.0ª	+1.7
Minority	34.2	17.2 <sup>a</sup>	34.7	20.7ª	+3.5
Minority male	15.6	12.1 <sup>a</sup>	16.0	12.1ª	-
Minority female	18.6	5.1 <sup>a</sup>	18.7	8.6ª	+3.5
Asian	8.4	3.5 <sup>a</sup>	8.6	5.2ª	+1.7
Black	17.6	12.1 <sup>a</sup>	17.7	12.1ª	-
Hispanic	6.9	1.7 <sup>a</sup>	7.0	3.5ª	+1.8
Small ERI groups	1.3	0.0 <sup>a</sup>	1.4	0.0 <sup>a</sup>	-
White	65.8	82.7	65.4	79.3	-3.4
White male	39.2	58.6	39.0	56.9	-1.7
White female	26.6	24.1 <sup>a</sup>	26.4	22.4ª	-1.7
Total number	3,958	58	3,930	58	

#### Table 9: OCC Participation in SLPs by EEO Groups, FY 2016 and FY 2017 (by Percentage)

Source: MD-715 workforce data table as of September 30, 2017.

 $^{\rm a}$  EEO groups participating at rates below their workforce participation rates.

Note: Small ERI groups are Native Americans, Native Hawaiians, and persons of two or more races combined.

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
FY 2014	1,625	58.5	41.5	7.3	13.7	3.1	6.9	69.0
FY 2015	1,440	58.4	41.6	6.9	14.9	8.6	1.3	68.3
FY 2016	1,506	59.6	40.4	7.2	14.9	8.6	1.0	68.3
FY 2017	2,068	57.5	42.5	7.4	14.4	7.0	1.3	70.0
Average OCC workforce participation rate		54.8	45.2	8.0	17.2	6.8	1.4	66.7

#### Table 10: OCC Career Development Training, Four-Year Trend (by Percentage)

Source: OCC TLMS Data Mart as of September 30, 2017.

#### Table 11: OCC Diversity and EEO Training, Four-Year Trend (by Percentage)

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
FY 2014	413	43.8	56.2	6.5	15.0	8.0	1.2	66.8
FY 2015	1,155	53.9	46.1	6.8	16.4	6.8	1.0	69.0
FY 2016	1,364	52.6	47.4	6.5	16.7	7.8	0.9	68.2
FY 2017	2,020ª	51.8	48.2	7.2	16.6	6.8	1.1	68.1
Average OCC workforce participation rate		54.6	45.4	7.5	16.9	6.6	1.5	67.5

Source: OCC TLMS Data Mart as of September 30, 2017.

Note: Participation of Diversity Dialogues not included in the diversity and EEO training.

<sup>a</sup> More than 15 courses were added to the list of diversity and EEO training courses participants took during FY 2017.