**The Office of the Comptroller of the Currency's**

**FY 2022**

**Affirmative Action Plan**

**for the**

**Recruitment, Hiring, Advancement, and**

**Retention of Persons with Disabilities**

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

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

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

## Section I: Efforts to Reach Regulatory Goals

*EEOC regulations (29 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with targeted disabilities in the federal government*

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

    a. Cluster GS-1 to GS-10 (PWD)                                    Answer    Yes

    b. Cluster GS-11 to SES (PWD)                                     Answer    Yes

New B4-1 in Data Insight (DI): The participation rates for PWD in grade clusters GS-1 to GS-10 was 10.50 percent and GS-11 to SES was 10.33 percent in FY 2022, below the 12.0 percent goal. {See attached report in the supplemental documents for footnote.} Note: GS-11 to SES grade cluster data were corrected based on an error in the data tables. GS-14 shows the wrong count and percentage.

*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

    a. Cluster GS-1 to GS-10 (PWTD)                                   Answer    Yes

    b. Cluster GS-11 to SES (PWTD)                                    Answer    Yes

New B4-1 in DI: The participation rates of PWTD in the grade clusters, GS-1 to GS-10 was 1.43 percent and GS-11 to SES was 1.89 percent in FY 2022, below the goal of 2.0 percent. Note: GS-11 to SES grade cluster data were corrected based on an error in the data tables. GS-14 shows the wrong count and percentage.

| Grade Level Cluster(GS or Alternate Pay Planb) | Total | Reportable Disability | | Targeted Disability | |
|---|---|---|---|---|---|
| | # | # | % | # | % |
| Numarical Goal | -- | 12% | | 2% | |
| Grades GS-1 to GS-10 | 419 | 44 | 10.50 | 6 | 1.43 |
| Grades GS-11 to SES | 3011 | 311 | 10.33 | 57 | 1.89 |

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

Numerical goals are communicated through a variety of methods, including the agency'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.

## A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If "no", describe the agency's plan to improve the staffing for the upcoming year.

   Answer    Yes

2. Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.

| Disability Program Task | # of FTE Staff By Employment Status | | | Responsible Official (Name, Title, Office Email) |
|---|---|---|---|---|
| | Full Time | Part Time | Collateral Duty | |
| Special Emphasis Program for PWD and PWTD | 4 | 0 | 0 | Joyce.Cofield@occ.treas.go |
| Processing applications from PWD and PWTD | 30 | 1 | 0 | Edner.Escarne@occ.treas.g |
| Answering questions from the public about hiring authorities that take disability into account | 30 | 1 | 0 | Edner.Escarne@occ.treas.g |
| Processing reasonable accommodation requests from applicants and employees | 1 | 0 | 0 | Kelly.Battista@occ.treas.go |
| Section 508 Compliance | 143 | 0 | 0 | Susan.Obrien@occ.treas.go |
| Architectural Barriers Act Compliance | 5 | 0 | 0 | Sheila N-Rad Director for Workplace Services Sheila.Nematollahi-rad@occ.treas.gov |

3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If "yes", describe the training that disability program staff have received. If "no", describe the training planned for the upcoming year.

   Answer    Yes

The National Accommodation Coordinator takes annual training courses to maintain the Americans with Disabilities Act (ADA)

Coordinators Training 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 include 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. The Workplace Services team receives contracting officer's technical representative training for overseeing contractor performance. Staff in Continuing Education responsible for reviewing new content for 508 compliance attended advanced training titled "Web 508 Accessibility BootCamp," and employees had opportunities to improve 508 compliance skills.

## B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If "no", describe the agency's plan to ensure all aspects of the disability program have sufficient funding and other resources.

Answer    Yes

# Section III: Program Deficiencies In The Disability Program

# Section IV: 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 APPLICATIONS WITH DISABILITIES

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

• Utilizes the Workforce Recruitment Program (WRP) as a source for recruiting disabled students and graduating seniors, including disabled veterans. • Maximizes the Pathways Intern Program to hire interns with targeted disabilities. • Continues 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.

2. Pursuant to 29 C.F.R. §1614.203(a)(3), describe the agency's use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce

OCC positions can be filled by using Schedule A and Veterans' Appointment Authorities to non-competitively appoint PWD and PWTD and veterans with a service-connected disability rating of 30 percent or more. The OCC's 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.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority; and, (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

When individuals apply utilizing the Schedule A hiring authority, their applications are reviewed by the servicing HR specialist, who confirms that the applicants meet the qualification requirements of the announced position and have provided required proof of disability. Applicants applying under the Schedule A hiring authority who are deemed qualified are referred to the hiring manager on a Schedule A certificate of eligibility with guidance on selection procedures including the application of veterans' preference, when applicable. Managers have the option to interview and/or hire from the Schedule A certificate or to consider other candidates from other issued certificates (Merit Promotion, Non-Competitive, Veterans Recruitment Appointment, etc.). Alternatively, when individuals submit their 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.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the agency's plan to provide this training.

Answer     Yes

• 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 the Whistleblower Ombudsman, and role of the Office of Special Counsel. Training is offered at least 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. These meetings were held with organizations such as George Mason University, George Washington University, Gallaudet University, The Arc-Montgomery County and Northern Virginia, Virginia Department for Aging and Rehabilitative Services, Understood, and Maryland Department of Rehabilitation Services. • 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)                    Answer     No

b. New Hires for Permanent Workforce (PWTD)          Answer     Yes

New B1 in DI: • PWD Hires: 12.20% vs. 12.0% • PWTD Hires: 0.00% vs. 2.0% Hiring rate of PWTD was below the EEOC goal of 2.0 percent.

| New Hires | Total | Reportable Disability | | Targeted Disability | |
|---|---|---|---|---|---|
| | | Permanent Workforce | Temporary Workforce | Permanent Workforce | Temporary Workforce |
| | (#) | (%) | (%) | (%) | (%) |
| % of Total Applicants | 0 | | | | |
| % of Qualified Applicants | 0 | | | | |
| % of New Hires | 0 | | | | |

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

    a. New Hires for MCO (PWD)          Answer     N/A

    b. New Hires for MCO (PWTD)          Answer     N/A

The OCC, as a second-level component of Treasury, does not have accurate applicant flow data required to submit a response to this question. Given Treasury's commitment to provide accurate and reliable data, based on the challenges identified in the Executive Summary, Treasury made the decision to exclude applicant flow data from the FY 2022 MD-715 submission. Treasury's Office of Civil Rights and Equal Employment Opportunity (OCRE) is hopeful that efforts made in FY 2023 will provide Treasury the opportunity to submit accurate applicant flow data and Part J responses for the FY 2023 MD-715 report.

| New Hires to Mission-Critical Occupations | Total | Reportable Disability | Targetable Disability |
|---|---|---|---|
| | | New Hires | New Hires |
| | (#) | (%) | (%) |
| Numerical Goal | -- | 12% | 2% |
| 0110 ECONOMIST | 0 | 0.00 | 0.00 |
| 0570 BANK EXAMINER | 0 | 0.00 | 0.00 |
| 0905 ATTORNEY | 0 | 0.00 | 0.00 |

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

    a. Qualified Applicants for MCO (PWD)          Answer     N/A

    b. Qualified Applicants for MCO (PWTD)          Answer     N/A

The OCC, as a second-level component of Treasury, does not have accurate applicant flow data required to submit a response to this question. Given Treasury's commitment to provide accurate and reliable data, based on the challenges identified in the Executive Summary, Treasury made the decision to exclude applicant flow data from the FY 2022 MD-715 submission. OCRE is hopeful that efforts made in FY 2023 will provide Treasury the opportunity to submit accurate applicant flow data and Part J responses for the FY 2023 MD-715 report.

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

|  |  |
|---|---|
| a. Promotions for MCO (PWD) | Answer   N/A |
| b. Promotions for MCO (PWTD) | Answer   N/A |

The OCC, as a second-level component of Treasury, does not have accurate applicant flow data required to submit a response to this question. Given Treasury's commitment to provide accurate and reliable data, based on the challenges identified in the Executive Summary, Treasury made the decision to exclude applicant flow data from the FY 2022 MD-715 submission. OCRE is hopeful that efforts made in FY 2023 will provide Treasury the opportunity to submit accurate applicant flow data and Part J responses for the FY 2023 MD-715 report.

# Section V: 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.

## B. CAREER DEVELOPMENT OPPORTUNITES

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

• The EXCEL I Program, sponsored by the Large Bank Supervision (LBS) department, provides bank examiners in pay band NB-V with opportunities 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 practice areas. • The Leadership Exploration and Development (LEAD) Program is an enterprise-wide leadership development program targeted to employees at the NB-V to NB-VI.2 levels, to help develop specific competencies aligned to skills and abilities needed at the team leader and/or manager level. • The MCBS NB-V Uniform Commission Examination (UCE) Recognition Events for Bank Examiners provide bank examiners exposure to career options available in the various bank supervision lines of business, resources and factors to consider when making career decisions, and the ability to learn more about leadership development. • External and agency training and development courses are available to all employees, in the classroom, online, and through virtual and self-study methods. • Temporary details and short–term work assignments are advertised to all employees on the agency's Opportunities Board internal website.

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

| Career Development Opportunities | Total Participants | | PWD | | PWTD | |
|---|---|---|---|---|---|---|
| | Applicants (#) | Selectees (#) | Applicants (%) | Selectees (%) | Applicants (%) | Selectees (%) |
| Detail Programs | 44 | 20 | 2.27% | 0.00% | 0.00% | 0.00% |
| Other Career Development Programs | ADNA | 69 | ADNA | 4.35% | ADNA | 0.00% |
| Training Programs | 3462 | 1521 | 10.46% | 10.65% | 1.85% | 2.10% |
| Fellowship Programs | N/A | N/A | N/A | N/A | N/A | N/A |
| Internship Programs | 0 | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Mentoring Programs | 2485 | 271 | 14.04% | 16.22% | 2.58% | 8.11% |
| Coaching Programs | 1629 | 162 | 8.23% | 11.11% | 1.66% | 2.47% |

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

        a. Applicants (PWD)                                 Answer   Yes

        b. Selections (PWD)                                 Answer   Yes

Note: N/A means "Not Applicable" and ADNA means "Applicant data not available." Applicant data are voluntarily self-identified. As such, a program may have selection data but not applicant data. {See attached report in the supplemental documents for footnote.} The OCC does not have a formal career development program (CDP); only agencies with formal CDPs are required to collect and report applicant pool data in the MD-715 workforce data tables. The OCC has populated the above Career Development Opportunities table with agency informal career development program data. For selections, triggers do not exist in all programs, except detail programs.

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

        a. Applicants (PWTD)                               Answer   Yes

        b. Selections (PWTD)                               Answer   Yes

Note: N/A means "Not Applicable" and ADNA means "Applicant data not available." Applicant data are voluntarily self-identified. As such, a program may have selection data but not applicant data. The OCC does not have a formal career development program (CDP); only agencies with formal CDPs are required to collect and report applicant pool data in the MD-715 workforce data tables. The OCC has populated the above Career Development Opportunities table with agency informal career development program data. For selections, triggers do not exist in any programs.

## 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)                Answer   Yes

        b. Awards, Bonuses, & Incentives (PWTD)               Answer   Yes

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 2.49% 3.13% 2.55% 11-20 1.66% 4.69% 0.90% 21-30 0.83% 0.00% 0.20% 31-40 0.28% 0.00% 0.23% Awards PWD PWTD No Disability < $500 98.90% 106.25% 111.44% $501-999 33.70% 35.94% 35.72% $1,000-1,999 11.60% 14.06% 13.90% The inclusion rates for PWD fell below the inclusion rates for employees with no disabilities in the 1-10 time-off award category. The inclusion rate for PWTD fell below the inclusion rate for employees with no disabilities in the 21-30 and 31-40 time-off award categories. The difference is less than 1 percent and it is not considered a trigger at this time. The inclusion rates for PWD and PWTD fell below the inclusion rates for employees with no disabilities in the less than $500 cash award category. The inclusion rate for PWD also fell below the inclusion rate for employees with no disabilities in the $501-999 and $1,000-$1,999 cash award categories. The difference is more than 1 percent and it is a trigger at this time.

| Time-Off Awards | Total (#) | Reportable Disability % | Without Reportable Disability % | Targeted Disability % | Without Targeted Disability % |
|---|---|---|---|---|---|
| Time-Off Awards 1 - 10 hours: Awards Given | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Time-Off Awards 1 - 10 Hours: Total Hours | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Time-Off Awards 1 - 10 Hours: Average Hours | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Time-Off Awards 11 - 20 hours: Awards Given | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Time-Off Awards 11 - 20 Hours: Total Hours | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Time-Off Awards 11 - 20 Hours: Average Hours | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Time-Off Awards 21 - 30 hours: Awards Given | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Time-Off Awards 21 - 30 Hours: Total Hours | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Time-Off Awards 21 - 30 Hours: Average Hours | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Time-Off Awards 31 - 40 hours: Awards Given | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Time-Off Awards 31 - 40 Hours: Total Hours | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Time-Off Awards 31 - 40 Hours: Average Hours | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Time-Off Awards 41 or more Hours: Awards Given | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Time-Off Awards 41 or more Hours: Total Hours | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Time-Off Awards 41 or more Hours: Average Hours | 0 | 0.00 | 0.00 | 0.00 | 0.00 |

| Cash Awards | Total (#) | Reportable Disability % | Without Reportable Disability % | Targeted Disability % | Without Targeted Disability % |
|---|---|---|---|---|---|
| Cash Awards: $501 - $999: Awards Given | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cash Awards: $501 - $999: Total Amount | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cash Awards: $501 - $999: Average Amount | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cash Awards: $1000 - $1999: Awards Given | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cash Awards: $1000 - $1999: Total Amount | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cash Awards: $1000 - $1999: Average Amount | 0 | 0.00 | 0.00 | 0.00 | 0.00 |

| Cash Awards | Total (#) | Reportable Disability % | Without Reportable Disability % | Targeted Disability % | Without Targeted Disability % |
|---|---|---|---|---|---|
| Cash Awards: $2000 - $2999: Awards Given | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cash Awards: $2000 - $2999: Total Amount | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cash Awards: $2000 - $2999: Average Amount | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cash Awards: $3000 - $3999: Awards Given | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cash Awards: $3000 - $3999: Total Amount | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cash Awards: $3000 - $3999: Average Amount | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cash Awards: $4000 - $4999: Awards Given | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cash Awards: $4000 - $4999: Total Amount | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cash Awards: $4000 - $4999: Average Amount | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cash Awards: $5000 or more: Awards Given | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cash Awards: $5000 or more: Total Amount | 0 | 0.00 | 0.00 | 0.00 | 0.00 |
| Cash Awards: $5000 or more: Average Amount | 0 | 0.00 | 0.00 | 0.00 | 0.00 |

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)                 Answer    No

      b. Pay Increases (PWTD)              Answer    No

| N/A |
|---|

| Other Awards | Total (#) | Reportable Disability % | Without Reportable Disability % | Targeted Disability % | Without Targeted Disability % |
|---|---|---|---|---|---|
| Total Performance Based Pay Increases Awarded | 0 | 0.00 | 0.00 | 0.00 | 0.00 |

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)       Answer    N/A

      b. Other Types of Recognition (PWTD)     Answer    N/A

| N/A |
|---|

## 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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

     a. SES

          i. Qualified Internal Applicants (PWD)                             Answer   N/A

          ii. Internal Selections (PWD)                                   Answer   N/A

     b. Grade GS-15

          i. Qualified Internal Applicants (PWD)                             Answer   N/A

          ii. Internal Selections (PWD)                                   Answer   N/A

     c. Grade GS-14

          i. Qualified Internal Applicants (PWD)                             Answer   N/A

          ii. Internal Selections (PWD)                                   Answer   N/A

     d. Grade GS-13

          i. Qualified Internal Applicants (PWD)                             Answer   N/A

          ii. Internal Selections (PWD)                                   Answer   N/A

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The OCC, as a second-level component of Treasury, does not have accurate applicant flow data required to submit a response to this question. Given Treasury's commitment to provide accurate and reliable data, based on the challenges identified in the Executive Summary, Treasury made the decision to exclude applicant flow data from the FY 2022 MD-715 submission. OCRE is hopeful that efforts made in FY 2023 will provide Treasury the opportunity to submit accurate applicant flow data and Part J responses for the FY 2023 MD-715 report.

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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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

     a. SES

          i. Qualified Internal Applicants (PWTD)                            Answer   N/A

          ii. Internal Selections (PWTD)                                  Answer   N/A

     b. Grade GS-15

          i. Qualified Internal Applicants (PWTD)                            Answer   N/A

          ii. Internal Selections (PWTD)                                  Answer   N/A

     c. Grade GS-14

          i. Qualified Internal Applicants (PWTD)                            Answer   N/A

          ii. Internal Selections (PWTD)                                  Answer   N/A

     d. Grade GS-13

          i. Qualified Internal Applicants (PWTD)                            Answer   N/A

      ii. Internal Selections (PWTD)                                    Answer    N/A

The OCC, as a second-level component of Treasury, does not have accurate applicant flow data required to submit a response to this question. Given Treasury's commitment to provide accurate and reliable data, based on the challenges identified in the Executive Summary, Treasury made the decision to exclude applicant flow data from the FY 2022 MD-715 submission. OCRE is hopeful that efforts made in FY 2023 will provide Treasury the opportunity to submit accurate applicant flow data and Part J responses for the FY 2023 MD-715 report.

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

      a. New Hires to SES (PWD)                                        Answer    N/A

      b. New Hires to GS-15 (PWD)                                     Answer    N/A

      c. New Hires to GS-14 (PWD)                                     Answer    N/A

      d. New Hires to GS-13 (PWD)                                     Answer    N/A

The OCC, as a second-level component of Treasury, does not have accurate applicant flow data required to submit a response to this question. Given Treasury's commitment to provide accurate and reliable data, based on the challenges identified in the Executive Summary, Treasury made the decision to exclude applicant flow data from the FY 2022 MD-715 submission. OCRE is hopeful that efforts made in FY 2023 will provide Treasury the opportunity to submit accurate applicant flow data and Part J responses for the FY 2023 MD-715 report.

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

      a. New Hires to SES (PWTD)                                       Answer    N/A

      b. New Hires to GS-15 (PWTD)                                    Answer    N/A

      c. New Hires to GS-14 (PWTD)                                    Answer    N/A

      d. New Hires to GS-13 (PWTD)                                    Answer    N/A

The OCC, as a second-level component of Treasury, does not have accurate applicant flow data required to submit a response to this question. Given Treasury's commitment to provide accurate and reliable data, based on the challenges identified in the Executive Summary, Treasury made the decision to exclude applicant flow data from the FY 2022 MD-715 submission. OCRE is hopeful that efforts made in FY 2023 will provide Treasury the opportunity to submit accurate applicant flow data and Part J responses for the FY 2023 MD-715 report.

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

      a. Executives

        i. Qualified Internal Applicants (PWD)                          Answer    N/A

      ii. Internal Selections (PWD)                    Answer    N/A

   b. Managers

      i. Qualified Internal Applicants (PWD)            Answer    N/A

      ii. Internal Selections (PWD)                    Answer    N/A

   c. Supervisors

      i. Qualified Internal Applicants (PWD)            Answer    N/A

      ii. Internal Selections (PWD)                    Answer    N/A

> The OCC, as a second-level component of Treasury, does not have accurate applicant flow data required to submit a response to this question. Given Treasury's commitment to provide accurate and reliable data, based on the challenges identified in the Executive Summary, Treasury made the decision to exclude applicant flow data from the FY 2022 MD-715 submission. OCRE is hopeful that efforts made in FY 2023 will provide Treasury the opportunity to submit accurate applicant flow data and Part J responses for the FY 2023 MD-715 report.

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

   a. Executives

      i. Qualified Internal Applicants (PWTD)          Answer    N/A

      ii. Internal Selections (PWTD)                  Answer    N/A

   b. Managers

      i. Qualified Internal Applicants (PWTD)           Answer    N/A

      ii. Internal Selections (PWTD)                  Answer    N/A

   c. Supervisors

      i. Qualified Internal Applicants (PWTD)          Answer    N/A

      ii. Internal Selections (PWTD)                  Answer    N/A

> The OCC, as a second-level component of Treasury, does not have accurate applicant flow data required to submit a response to this question. Given Treasury's commitment to provide accurate and reliable data, based on the challenges identified in the Executive Summary, Treasury made the decision to exclude applicant flow data from the FY 2022 MD-715 submission. OCRE is hopeful that efforts made in FY 2023 will provide Treasury the opportunity to submit accurate applicant flow data and Part J responses for the FY 2023 MD-715 report.

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

      a. New Hires for Executives (PWD)               Answer    N/A

      b. New Hires for Managers (PWD)                Answer    N/A

      c. New Hires for Supervisors (PWD)               Answer    N/A

The OCC, as a second-level component of Treasury, does not have accurate applicant flow data required to submit a response to this question. Given Treasury's commitment to provide accurate and reliable data, based on the challenges identified in the Executive Summary, Treasury made the decision to exclude applicant flow data from the FY 2022 MD-715 submission. OCRE is hopeful that efforts made in FY 2023 will provide Treasury the opportunity to submit accurate applicant flow data and Part J responses for the FY 2023 MD-715 report.

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

| | | |
|---|---|---|
| a. New Hires for Executives (PWTD) | Answer | N/A |
| b. New Hires for Managers (PWTD) | Answer | N/A |
| c. New Hires for Supervisors (PWTD) | Answer | N/A |

The OCC, as a second-level component of Treasury, does not have accurate applicant flow data required to submit a response to this question. Given Treasury's commitment to provide accurate and reliable data, based on the challenges identified in the Executive Summary, Treasury made the decision to exclude applicant flow data from the FY 2022 MD-715 submission. OCRE is hopeful that efforts made in FY 2023 will provide Treasury the opportunity to submit accurate applicant flow data and Part J responses for the FY 2023 MD-715 report.

# Section VI: Plan to Improve Retention of Persons with Disabilities

To be 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 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.

Answer    N/A

There were no Schedule A hires in FY 2020 due to limited external hiring, which ultimately means there were no conversions in FY 2022. The OCC continued to revise its staffing priorities in FY 2020, resulting in fewer external hires with a focused effort on development and retention of the current workforce.

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) | Answer | No |
| b.Involuntary Separations (PWD) | Answer | No |

Old B14 in DI: The inclusion rate for PWD was below the rate of persons with no disabilities for voluntary and involuntary separations—8.56 percent vs. 9.12 percent and 0.00 percent vs. 0.017 percent, respectively.

| Seperations | Total # | Reportable Disabilities % | Without Reportable Disabilities % |
|---|---|---|---|
| Permanent Workforce: Reduction in Force | 0 | 0.00 | 0.00 |

| Seperations | Total # | Reportable Disabilities % | Without Reportable Disabilities % |
|---|---|---|---|
| Permanent Workforce: Removal | 5 | 0.00 | 0.16 |
| Permanent Workforce: Resignation | 149 | 3.59 | 4.37 |
| Permanent Workforce: Retirement | 137 | 3.04 | 4.05 |
| Permanent Workforce: Other Separations | 29 | 1.93 | 0.71 |
| Permanent Workforce: Total Separations | 320 | 8.56 | 9.29 |

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

        a.Voluntary Separations (PWTD)                                 Answer    Yes

        b.Involuntary Separations (PWTD)                            Answer    No

Old B14 in DI: The inclusion rate of PWTD (9.38 percent) exceeded the rate of persons with no disabilities for voluntary separations (9.12 percent).

| Seperations | Total # | Targeted Disabilities % | Without Targeted Disabilities % |
|---|---|---|---|
| Permanent Workforce: Reduction in Force | 0 | 0.00 | 0.00 |
| Permanent Workforce: Removal | 5 | 0.00 | 0.15 |
| Permanent Workforce: Resignation | 149 | 3.13 | 4.31 |
| Permanent Workforce: Retirement | 137 | 4.69 | 3.93 |
| Permanent Workforce: Other Separations | 29 | 1.56 | 0.82 |
| Permanent Workforce: Total Separations | 320 | 9.38 | 9.21 |

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 2022, there were 14 exit survey respondents with disabilities: four retired, six accepted other positions, two resigned, one left for personal circumstances, and one was a termination. A large majority (78.6 percent) indicated they would return to work for the OCC/Treasury, and there was nothing that could have been done to prevent them from leaving the agency (71.4 percent). Also, 85.7 percent indicated they would recommend the OCC/Treasury as a good place to work, and 71.4 percent stated they generally had a positive work experience. Eleven issues were cited by PWD as the primary reasons for leaving (keeping in mind there were 14 respondents): job stress; career growth; four issues that were equally cited—office morale, pay, workload, and cooperativeness and teamwork (relationship with supervisor); availability of resources for office to achieve goals (work experience); and four additional issues that were equally cited—recognition of efforts, contributions, and achievements (relationship with supervisor), empowerment to improve performance (relationship with supervisor), demonstration of skills and capabilities (work experience), and job description in relation to actual duties and responsibilities (work experience). In the agency-wide survey results, job stress, pay, workload, office morale, and career growth were cited most often.

## B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 CFR §1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

https://www.occ.gov/about/policies/accessibility.html https://www.helpwithmybank.gov/policies/policies-web-site.html Instructions on how to file a complaint: https://www.helpwithmybank.gov/policies/accessibility.html

2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under the
Architectural Barriers Act, including a description of how to file a complaint.

To file a complaint, go to this webpage and click on the link titled "File a Complaint." https://www.treasury.gov/about/organizational-structure/offices/Mgt/Documents/Section508_Complaint_Processing.pdf 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.

The OCC continued to work toward ensuring 508 users had necessary information and communication technology to effectively perform their jobs. Focused one-on-one training was provided to 508 users to ensure that the individuals used assistive technologies in the most efficient and effective manner. The OCC also provided training to Editorial and Design Services personnel for checking work product accessibility. Additionally, the Differently Abled Workforce Network (DAWN) participated with the Veterans Employee Network (VEN) to host four "Coffee Break" sessions that covered topics such as mental and physical health awareness, career development resources, and physical growth.

## C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

10 business days or less

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

In FY 2022, 96 percent of RA requests were processed within the time frame set forth in the agency procedures. In addition, the agency approved all requests for reasonable accommodation. The OCC also has an interagency agreement with the Federal Occupational Health Agency to conduct ergonomic consultation and assessments (e.g., fitness for duty) in FY 2022, and will continue to do so in FY 2023. The agency conducted mandatory RA training for all managers and supervisors in FY 2022.

## D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

*Pursuant to 29 CFR §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 Office of Personnel Management. 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. To date, the OCC has not used these services.

# Section VII: 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 governmentwide average?

   Answer    No

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?

   Answer    No

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.

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## 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?

   Answer    No

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?

   Answer    No

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.

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# Section VIII: 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?

   Answer    Yes

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

   Answer    Yes

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

| Source of the Trigger: | Workforce Data (if so identify the table) |
|---|---|
| **Specific Workforce Data Table:** | Workforce Data Table - B6 |
| **STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:**<br><br>Provide a brief narrative describing the condition at issue.<br><br>How was the condition recognized as a potential barrier? | 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. |

| **STATEMENT OF BARRIER GROUPS:** | *Barrier Group* |
|---|---|
| | People with Disabilities |

| **Barrier Analysis Process Completed?:** | Y |
|---|---|
| **Barrier(s) Identified?:** | Y |

| **STATEMENT OF IDENTIFIED BARRIER:**<br><br>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition. | **Barrier Name** | **Description of Policy, Procedure, or Practice** |
|---|---|---|
| | Outreach and recruitment strategies | Underutilization of specific outreach and recruitment strategies for PWD. |

| **Objective(s) and Dates for EEO Plan** | | | | | |
|---|---|---|---|---|---|
| **Date Initiated** | **Target Date** | **Sufficient Funding / Staffing?** | **Date Modified** | **Date Completed** | **Objective Description** |
| 10/01/2005 | 09/30/2029 | Yes | | | Increase outreach and recruitment to PWD. |

| **Responsible Official(s)** | | |
|---|---|---|
| **Title** | **Name** | **Standards Address The Plan?** |
| Senior Deputy Comptroller | All Executive Committee Members | Yes |
| Executive Director, Office of Minority and Women Inclusion | Joyce Cofield | Yes |

| Planned Activities Toward Completion of Objective | | | | |
|---|---|---|---|---|
| **Target Date** | **Planned Activities** | **Sufficient Staffing & Funding?** | **Modified Date** | **Completion Date** |
| 09/30/2018 | The OCC encourages the servicing human resources (HR) specialists and lead 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 the lengthy traditional hiring process. | Yes | | 09/30/2022 |
| 09/30/2018 | Establish and maintain relationships with organizations that assist PWD in securing and obtaining employment. These organizations include local colleges, universities, and professional organizations. | Yes | | 09/30/2022 |
| 09/30/2018 | Provide annual refresher training to HR specialists about PWD hiring information. | Yes | | 09/30/2022 |
| 09/30/2018 | Use the Workforce Recruitment Program (WRP) as a source for recruiting PWD and a pipeline for permanent positions. | Yes | | 09/30/2022 |
| 09/30/2018 | The OCC will continue to look for ways to source positions for PWD in other job series (not identified in the trigger, i.e., Office of Management, Public Affairs, and Community Affairs). | Yes | | 09/30/2022 |
| 09/30/2019 | Explore opportunities for OCC representatives to recruit/ present at PWD events about careers in the federal government. | Yes | | 09/30/2022 |
| 09/30/2019 | Expand the use of applicant flow data for more efficient analysis and dialogue with leadership on improving diversity and inclusion for PWD. | Yes | | 09/30/2022 |
| 09/30/2020 | Talent Acquisition Operations will send out quarterly emails to all managers/supervisors as a reminder of all available special hiring authorities and resources in recruiting and hiring PWD and WRP applicants. | Yes | | 09/30/2022 |
| **Report of Accomplishments** | | | | |
| **Fiscal Year** | **Accomplishment** | | | |
| 2022 | Between FY 2018 and FY 2022, PWD in mission-critical/major occupations (MCO)—bank examiners, attorneys, economists, and IT specialists—participated (7.0 percent) below the EEOC goal of 12.0 percent. In FY 2022, PWD increased participation in three MCO positions from FY 2021—bank examiners (7.2 percent vs. 7.7 percent), IT specialists (11.7 percent vs. 13.3 percent), and attorneys (3.8 percent vs. 4.4 percent). <br><br>PWD in MCO were hired at a rate of 5.9 percent on average from FY 2018 through FY 2022, below the EEOC goal of 12.0 percent. In FY 2022, 42.9 percent of the OCC hires with disabilities were in MCO, represented by eight bank examiners, three IT specialists, and one attorney. There are limited hiring opportunities in the attorney, economist, and IT specialist occupations. In addition, the OCC continued its focused effort on development and retention of the current workforce. <br><br>Separations of PWD in MCO (9.5 percent) between FY 2018 and FY 2022 on average were above their workforce participation rate (7.0 percent). In FY 2022, the rate of separations of PWD increased from FY 2021 in all MCO, except economist positions, which remained at zero. | | | |

| Source of the Trigger: | Workforce Data (if so identify the table) |
|---|---|
| **Specific Workforce Data Table:** | Workforce Data Table - B14 |
| **STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:**<br><br>Provide a brief narrative describing the condition at issue.<br><br>How was the condition recognized as a potential barrier? | Lower than expected participation rate (percentage) in career development programs (retention focus) for PWD compared with the relevant availability pool. |

| **STATEMENT OF BARRIER GROUPS:** | *Barrier Group* |
|---|---|
| | People with Disabilities |

| **Barrier Analysis Process Completed?:** | Y |
|---|---|
| **Barrier(s) Identified?:** | Y |

| **STATEMENT OF IDENTIFIED BARRIER:**<br><br>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition. | **Barrier Name** | **Description of Policy, Procedure, or Practice** |
|---|---|---|
| | Career Development and Retention Activities | Insufficient attention to the accessibility of career development and retention activities and programs, and the full participation by PWD in those activities and programs. |

**Objective(s) and Dates for EEO Plan**

| Date Initiated | Target Date | Sufficient Funding / Staffing? | Date Modified | Date Completed | Objective Description |
|---|---|---|---|---|---|
| 10/01/2005 | 09/30/2029 | Yes | | | Increase the retention and the participation of PWD in the OCC's career development programs. |

**Responsible Official(s)**

| Title | Name | Standards Address The Plan? |
|---|---|---|
| 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 | Planned Activities | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|---|---|---|---|---|
| 09/30/2018 | Encourage PWD to participate in management, leadership, and career development programs through employee network groups (ENG) and a variety of other communication venues throughout the agency. | Yes | | 09/30/2022 |

| Planned Activities Toward Completion of Objective | | | | |
|---|---|---|---|---|
| **Target Date** | **Planned Activities** | **Sufficient Staffing & Funding?** | **Modified Date** | **Completion Date** |
| 09/30/2018 | Share developmental opportunities available throughout the agency with PWD through the ENGs. | Yes | | 09/30/2022 |
| 09/30/2018 | Managers should encourage PWD to participate in developmental opportunities that support their career goals at the OCC. | Yes | | 09/30/2022 |
| 09/30/2019 | Managers are strongly encouraged to manage the date the employee is eligible for conversion into the competitive 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. Talent Acquisition staff will send managers a quarterly email reminder regarding their employees' eligibility to convert to competitive service. | Yes | | 09/30/2022 |
| 09/30/2019 | Partner with Leadership and Development and Continuing Education to<br>a) ensure concerns associated with PWD are considered in course development.<br>b) enhance OCC courses with language that clearly is more inclusive of PWD. | Yes | | 09/30/2022 |
| 09/30/2020 | Publish annually or semiannually, if possible, through various methods (e.g., "What's New at the OCC" (WNOCC)/ SuperVisions/OCCnet) information and data on PWD, to include workforce participation, hiring, and separation rates. | Yes | | 09/30/2022 |
| 09/30/2020 | Educate all employees and managers/supervisors at least once a year (each) on the reasonable accommodation process by partnering with Differently Abled Workforce Network (DAWN) and OMWI by various educational methods, such as<br>• hosting webinars, brown-bag lunches, workshops, and/or panel discussions.<br>• featuring and spotlighting relevant topics, stories, and/or videos in SuperVisions, WNOCC, and on OCCnet. | Yes | | 09/30/2022 |
| 09/30/2020 | 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, SuperVisions, and OCCnet. | Yes | 09/30/2023 | |
| **Report of Accomplishments** | | | | |
| **Fiscal Year** | **Accomplishment** | | | |
| 2022 | Historically, the participation rates of PWD in career development programs were generally absent or below their relevant workforce participation rates for more than five years. However, over the last five years in each career development program, the participation rate of PWD has improved, and PWD are generally participating above their relevant workforce participation rates. In FY 2022, PWD exceeded their workforce participation in all career development programs, except the Leadership Exploration and Development (LEAD) Cohort III Program. | | | |

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

Due to resource constraints, the OCC was unable to publish technology-based information about 508 needs but will do so in FY 2023.

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 8.8 percent in FY 2018 to 10.5 percent in FY 2022. No applicant flow analysis was conducted on the applicant flow rate for PWD due to anomalies in the data which compromised the accuracy and integrity of the data results. FY 2022 was a transitional year with applicant tracking data blended from Monster Analytics and USA Staffing data collection systems. Treasury identified significant differences between Monster Analytics and USA Staffing impacting Treasury's ability to collect and track applicant flow data. {See attached report in the supplemental documents for footnote.} The OCC retained 66.7 percent of its non-competitive Schedule A hires from FY 2018 to FY 2022 and converted 33.3 percent of its eligible Schedule A hires since FY 2018.

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. 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.