



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

**FY 2019**

**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**

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## 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: The participation rates for PWD at both grade clusters, GS-1 to GS-10 and GS-11 to SES, were 11.34 percent and 8.73 percent, respectively, in FY 2019, below the 12 percent goal. (Note: SES equivalent positions in the OCC are SLPs, NB-VIII, and NB-IX.)

\*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 No  |
| b. Cluster GS-11 to SES (PWTD)  | Answer Yes |

New B4-1: The participation rate of PWTD in the GS-11 to SES cluster was 1.95 percent in FY 2019, which falls below the goal of 2 percent.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical Goal	--	12%		2%	
Grades GS-1 to GS-10	494	56	11.3%	11	2.2%
Grades GS-11 to SES	3128	273	8.7%	61	2.0%

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

Numerical goals are communicated through a variety of methods, including the agency'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 PWTB	4	0	0	Joyce.Cofield@occ.treas.go
Processing applications from PWD and PWTB	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.Gauvin@occ.treas.go
Section 508 Compliance	72	0	0	Susan.Obrien@occ.treas.go
Architectural Barriers Act Compliance	7	1	3	Hans.Heidenreich@occ.tre

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 ADA Coordinators Certification and to remain abreast of the latest reasonable accommodation (RA) regulations, case law, news, and issues. All human resources (HR) professionals are required to complete online courses related to veterans’ employment, which includes disability components. This training, provided by the Treasury Department, is mandated by Executive Order (EO) 13518. HR representatives are also required to complete annual training on the No FEAR Act, which includes a disability component. The OCC plans a more focused training

effort for all HR Specialists who are responsible for advising hiring managers regarding use of special hiring authorities. In addition, the OCC's Recruitment Skills Course for hiring managers will be updated to include additional information about special hiring authorities. The Workplace Services team receives contracting officers training for overseeing contractor performance.

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

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

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 efforts to outreach to Disability and Military Student offices to promote internship opportunities. • Participates in recruitment events, fairs, and conferences, e.g., Hiring Heroes, Federal Disability Workforce Consortium, Department of Labor's WRP Training, and the Treasury Department's Veteran Employment Summit at the Treasury Executive Institute to market the OCC and its job opportunities. • Continues to explore networking websites to enhance outreach efforts to individuals with disabilities. • Works with HR Specialists and selecting officials, by way of training, communication meetings, to encourage the use of special appointing authorities. Additionally, RA statements are included on all job announcements to ensure applicants with disabilities are informed of available RA. • Encourages all managers and supervisors to consider the benefits of hiring individuals with disabilities and using the Schedule A hiring authority.

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

OCC positions can be filled by using Schedule A and Veterans' Appointment Authorities to non-competitively appoint PWD and PWTD and veterans with a service-connected disability rating of 30 percent or more. The OCC's primary source for Schedule A and Veteran resume searches is the use of the WRP's database and working closely with Treasury's Veteran Employment Office. 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 resumes via email from Schedule A applicants and forwarded them to the servicing HR Specialists, as well as alerted candidates to submit their resumes online. The PM alerted both hiring managers and HR staffing specialists on the value of hiring external disabled applicants and available resources for locating such candidates.

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

When individuals apply utilizing the Schedule A hiring authority, their applications are reviewed by the servicing HR specialist who confirms that the applicants meet the qualification requirements of the announced position and have provided required proof of disability. Applicants applying under the Schedule A hiring authority who are deemed qualified are referred to the hiring manager on a Schedule A certificate of eligibility with guidance on selection procedures including the application of veterans' preference, when applicable. Managers have the option to interview and/or hire from the Schedule A certificate or to consider other candidates from other issued certificates (Merit Promotion, Non-Competitive, Veterans Recruitment Appointment, etc.). Alternatively, when individuals submit their resumes directly to the Special Placement Program Coordinator (SPPC) for vacant positions within OCC, the SPPC refers the applicant to the [www.occ.gov/careers](http://www.occ.gov/careers) website to apply for any specific job announcement for which they want consideration. They are also reminded to submit supplemental documentation that makes them eligible for a Schedule A appointment. We also inform them, via email, 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 human resource 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 or those who become managers and selected HR professionals throughout the year, and annually to managers, supervisors, and selected HR professionals.
- Merit System Principles, Prohibited Personnel Practices, and Whistleblower Protection: This course covers the merit system principles, prohibited personnel practices, whistleblower protection, role of the Whistleblower Ombudsman and role of the Office of Special Counsel. Training offered minimally every three years.
- Human Capital Fundamentals for New Managers: This training reviews the OCC's manager roles and responsibilities, providing guidance to help newly hired or promoted managers. Topics covered include competencies that are central to the manager's role and responsibilities in human capital management and HR processes that are essential to successfully performing supervisor functions (e.g., managing telework, administering leave, managing travel, and the use of hiring authorities including those that take disabilities into account). These sessions are offered two to three times a year for new managers.

**B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS**

Describe the agency's efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

- Hold periodic meetings with professional organizations to share the OCC's process for providing vacancy announcements, and sharing information about opportunities, including career development tracks.
- Attend specialty conferences and career/job fairs to share information about the OCC's mission, work environment and job opportunities.
- Host brown-bag lunches and roundtable discussions with organizations that assist PWD/PWTD, hiring managers/senior management, and HC.

**C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)**

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If "yes", please describe the triggers below.

a. New Hires for Permanent Workforce (PWD) Answer Yes

b. New Hires for Permanent Workforce (PWTD) Answer No

New B1: • PWD Hires: 8.70 percent vs. 12.0 percent Hiring rate for PWD was below the Section 501 goal of 12.0 percent.

New Hires	Total	Reportable Disability		Targeted Disability	
		Permanent Workforce	Temporary Workforce	Permanent Workforce	Temporary Workforce

	(#)	(%)	(%)	(%)	(%)
% of Total Applicants	3178	4.28%	0.00%	1.70%	0.00%
% of Qualified Applicants	2446	4.13%	0.00%	1.60%	0.00%
% of New Hires	240	2.92%	0.00%	0.83%	0.00%

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 No
- b. New Hires for MCO (PWTD) Answer No

Combination of the new B6 in Workforce Analytics (WA) and the new B6 in Monster Analytics (Monster). NA in qualified applicant means Not Available. NH in hires means No Hire. FY 2019 Hires Qualified vs. Hires Qualified vs. Hires 0110 (0) Hires: PWD: 22.2% - NH PWTD: 2.22% - NH 0570 (66) Hires: PWD: 4.69% - 4.55% PWTD: 1.12% – 1.52% 0905 (1) Hires: PWD: NA – 0.00% PWTD: NA - 0.00% The OCC noted a slight difference (0.14%) in the occupational series 0570 when comparing the qualified applicant flow data with the hires for PWD. The difference is less than 1 percent and not considered a trigger at this time. As attorneys (0905) and economists (0110) have limited hiring, there were not enough hires to determine if there is an actual trigger. With limited hiring there cannot be a realistic expectation that all groups (PWD and PWTD) would be hired at rates comparable to their qualification rates.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	%		%	
0110ECONOMIST					
0570BANK EXAMINER					
0905ATTORNEY					

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 Yes
- b. Qualified Applicants for MCO (PWTD) Answer Yes

New B6 in Monster relevant applicant pool is the applied compared with the qualified. NA in qualified applicant means Not Available. FY 2019 Promotions Applicants vs. qualified Applicants vs. qualified 0110 (2) Promotions: PWD: 6.12% - 0.00% PWTD: 1.02% - 0.00% 0570 (1) Promotions: PWD: 6.75% - 3.55% PWTD: 1.42% - 0.99% 0905 (0) Promotions: PWD: 3.57% - NA PWTD: 1.19% - NA NOTE: The Treasury Department/OCC is currently working with its Workforce Analytics contractors to validate its data and align the guidance for internal competitive promotions requested from the EEOC.

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 No
- b. Promotions for MCO (PWTD) Answer No

New B6 in WA and the new B6 in Monster. Compare qualified applicants with promotion in the MCOs. NS in employees' promotions means No Selection. NA in qualified applicant means Not Available. FY 2019 Promotions Qualified vs Promotions Qualified vs Promotions 0110 (2) Promotions: PWD: 0.00% - 0.00% PWTD: 0.00% - 0.00% 0570 (1) Promotions: PWD: 3.55% - 0.00% PWTD: 0.99% - 0.00% 0905 (0) Promotions: PWD: NA - NS PWTD: NA - NS NOTE: The Treasury Department/OCC is currently working with its Workforce Analytics contractors to validate its data and align the guidance for internal competitive promotions requested from the EEOC.

## Section 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 OCC") and monthly (SuperVisions) newsletters, and website postings. Opportunities also will be shared by ENG's. • 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 the opportunity to develop expertise in one of eight specialty areas. • The EXCEL II Program expanded professional development opportunities for bank examiners in pay band NB-IV in the eight specialty areas of the EXCEL I Program. • Midsize and Community Bank Supervision (MCBS) Pre-commission Bank Examiners Career Forums provide information about bank examiner career opportunities and explain the Uniform Commission Examination (UCE) preparatory process. • The Honors Attorney Program is designed to provide cross-training and developmental assignments to equip attorneys with legal skills and experiences across multiple legal practices areas. • The Leadership Exploration and Development (LEAD) Program is an enterprise-wide leadership development program targeted to employees at the NB-V to NB-VI.2 levels, to help develop specific competencies aligned to skills and abilities needed at the team leader and/or manager level. • The MCBS NB-V Career Forum for Bank Examiners provides bank examiners exposure to the career options available in the various bank supervision lines of business, and resources and factors to consider when making career decisions. It also provides opportunities to network with senior leaders throughout the agency. • Non-examiner Career Forums provide non-examiners exposure to the variety of career options in the non-examiner lines of business. • Agency training and development courses are available to all employees, in the classroom, online, virtual, and self-study. • Temporary details and short-term work assignments are advertised to all employees on the agency's Opportunities Board.

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 (%)
Internship Programs	102	4	1.0%	0.0%	0.0%	0.0%
Detail Programs	33	9	3.0%	0.0%	0.0%	0.0%



Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Other Career Development Programs	22	2	2.1%	3.6%	N/A	0.0%
Mentoring Programs	887	128	11.3%	10.2%	2.7%	1.6%
Coaching Programs	1524	147	6.3%	12.2%	1.6%	2.0%
Training Programs	3622	2169	9.1%	9.5%	2.0%	1.7%

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 No
- b. Selections (PWD) Answer No

The OCC doesn't 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.

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 No
- b. Selections (PWTD) Answer No

The OCC doesn't have a formal CDP; only agencies with formal CDPs are required to collect and report applicant pool data in the MD-715 Workforce data tables.

**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 No

New WA B9-2. 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 0.00% 0.00% 1.20% 11-20 0.00% 0.00% 0.09% 21-30 0.00% 0.00% 0.06% 31-40 NA NA NA  
 Awards PWD PWTD No Disability < \$500 46.20% 52.78% 42.71% \$501-999 27.66% 37.50% 24.67% \$1000-1999 7.90% 12.50%  
 9.03% The inclusion rates for PWD and PWTD fell below the inclusion rates for employees with no disabilities in three time-off awards categories. The OCC noted differences in inclusion rates for PWD and PWTD time-off awards when comparing the inclusion rates of employees with no disabilities. The difference is less than 1 percent and it is not considered a trigger at this time. The inclusion rate for PWD fell below the inclusion rates for employees with no disabilities in the \$1000-1999 cash award category. The OCC noted differences in inclusion rate for PWD in \$1000-1999 (1.13 percent) cash awards when comparing the inclusion rates of employees with no disabilities. The difference is more than 1 percent and it is considered a trigger at this time.

Time-Off Awards	Total (#)	Reportable Disabilities	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards: 1-9 hours: Total Time-Off Awards Given					
Time-Off Awards: 9+ hours: Total Time-Off Awards Given					

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$100 - \$500: Total Cash Awards Given					
Cash Awards: \$501+: Total Cash Awards Given					

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 %
Performance Based Pay Increase	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 Yes
  - ii. Internal Selections (PWD) Answer No
- b. Grade GS-15
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer No

- c. Grade GS-14
  - i. Qualified Internal Applicants (PWD)      Answer No
  - ii. Internal Selections (PWD) Answer No
- d. Grade GS-13
  - i. Qualified Internal Applicants (PWD)      Answer No
  - ii. Internal Selections (PWD) Answer No

New B7 WA and the new B7 Monster. NA in qualified applicant means Not Available. Relevant Applicants/Qualified/Promotions GS-13 - PWD: 15.15% - NA – 33.33% GS-14 - PWD: 10.05% - NA – 20.00% GS-15 - PWD: 6.53% - NA – 0.00% SES - PWD: 5.84% - 0.00% -0.00% NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC’s NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics.

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

New B7 WA and the new B7 Monster. NA in qualified applicant means Not Available. Relevant Applicants/Qualified/Promotions GS-13 - PWTD: 2.42% - NA – 16.67% GS-14 - PWTD: 2.11% - NA – 0.00% GS-15 - PWTD: 1.57% - NA – 0.00% SES - PWTD: 1.95% - 0.00% - 0.00% NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC’s NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics.

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 No

- |                             |        |    |
|-----------------------------|--------|----|
| b. New Hires to GS-15 (PWD) | Answer | No |
| c. New Hires to GS-14 (PWD) | Answer | No |
| d. New Hires to GS-13 (PWD) | Answer | No |

New B7 WA and the new B7 Monster. NA in qualified applicant means Not Available. Qualified Applicants/Hires GS-13 - PWD: NA – 12.50% GS-14 - PWD: NA – 0.00% GS-15 - PWD: NA – 33.33% SES - PWD: NA- 0.00% NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through Career Connector. However, an error occurred in the data processing for cross-walking the OCC’s NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. 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 | No |
| b. New Hires to GS-15 (PWTD) | Answer | No |
| c. New Hires to GS-14 (PWTD) | Answer | No |
| d. New Hires to GS-13 (PWTD) | Answer | No |

New B7 WA and the new B7 Monster. NA in qualified applicant means Not Available. Qualified Applicants/Hires GS-13 - PWTD: NA – 12.50% GS-14 - PWTD: NA – 0.00% GS-15 - PWTD: NA – 33.33% SES - PWTD: NA – 0.00% NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC’s NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics.

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

New B8 WA and the new B8 Monster. NA in qualified applicant means Not Available. Qualified Applicants/Promotions Executives - PWD: 0.00% - 0.00% Managers - PWD: NA - 0.00% There were no internal Supervisor vacancy announcements and selections. NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics.

- Does your agency have a trigger involving PWTB 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.

d. Executives

- |   |        |     |
|---|--------|-----|
| i. Qualified Internal Applicants (PWTB) | Answer | Yes |
| ii. Internal Selections (PWTB)          | Answer | No  |

e. Managers

- |   |        |    |
|---|--------|----|
| i. Qualified Internal Applicants (PWTB) | Answer | No |
| ii. Internal Selections (PWTB)          | Answer | No |

f. Supervisors

- |   |        |    |
|---|--------|----|
| i. Qualified Internal Applicants (PWTB) | Answer | No |
| ii. Internal Selections (PWTB)          | Answer | No |

New B8 WA and new B8 Monster. NA in qualified applicant means Not Available. Qualified Applicants/Promotions Executives - PWTB: 0.00% - 0.00% Managers - PWTB: NA - 0.00% There were no internal Supervisor vacancy announcements and selections. NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics. NOTE: The OCC has no “Supervisors” in GS-12 and below equivalent grades. The OCC's supervisory/managerial positions begin at GS-13 and above equivalent levels.

- 6. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. 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 (PWTB)  | Answer | No |
| b. New Hires for Managers (PWTB)    | Answer | No |
| c. New Hires for Supervisors (PWTB) | Answer | No |

New B8 WA and new B8 Monster. NA in qualified applicant means Not Available. Qualified Applicants/Hires Executives - PWTB: NA - 25.00% Managers - PWTB: NA - 0.00% There were no external Supervisor vacancy announcements and selections. NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics. NOTE: The OCC has no “Supervisors” in GS-12 and below equivalent grades. The OCC's supervisory/managerial positions begin at GS-13 and above equivalent levels.

- 7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. 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 No
- b. New Hires for Managers (PWTD) Answer No
- c. New Hires for Supervisors (PWTD) Answer No

New B8 WA and new B8 Monster. NA in qualified applicant means Not Available. Qualified Applicants/Hires Executives - PWTD: NA - 25.00% Managers - PWTD: NA - 0.00% There were no external Supervisor vacancy announcements and selections. NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics. NOTE: The OCC has no "Supervisors" in GS-12 and below equivalent grades. The OCC's supervisory/managerial positions begin at GS-13 and above equivalent levels.

## Section 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 Yes

In FY 2019, the OCC converted to career status two of the three Schedule A employees it hired in FY 2017; management officials are working on the conversion process for the remaining employee who became eligible at the end of the fiscal year.

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 Yes
- b. Involuntary Separations (PWD) Answer Yes

Old B14 in WA: The inclusion rate for PWD exceeded the rate of persons with no disabilities for involuntary (0.30 percent vs. 0.06 percent) and voluntary separations (10.94 percent vs. 7.77 percent).

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce			
Total Separations			
Voluntary Separations			
Involuntary Separations			

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 WA: The inclusion rate of PWTD (12.5 percent) exceeded the rate of persons without disabilities for voluntary (7.77 percent).

Separations	Total #	Targeted Disabilities %	Without Reportable Disabilities %
Permanent Workforce			
Total Separations			
Voluntary Separations			
Involuntary Separations			

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 2019, there were nine exit survey respondents with disabilities: five retired, three accepted other positions, and one resigned. A large majority (88.9 percent) indicated they would recommend the OCC/Treasury as a good place to work. Also, 77.8 percent of the respondents indicated they generally had a positive work experience, would return to work for the OCC/Treasury, and there was nothing that could have been done to prevent them from leaving the agency. Job-related stress, training opportunities, workload, and skills and capabilities (work experience) were the reasons most often cited by PWD in the FY 2019 exit surveys. This differed from the agency-wide survey results, where job-related stress was 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.

<https://occ.gov/about/policies/accessibility.html> To file a complaint, go to this webpage and click on the link titled “File a Complaint.” For concerns about OCC’s buildings and facilities, contact: Facilities Management Office: (202) 649-7288 TTY: (800) 877-8339 (via a relay service)

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

In FY 2019, the OCC finalized and implemented the policies and procedures manual on IT Accessibility (Section 508).

**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

7 business days or less

period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

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 2019, 97 percent of RA requests were processed within the time frame set forth in the agency procedures. In addition, the agency provided assistive computing devices and technologies, software enhancements, and electric scooter support to assist employees with medical conditions. The OCC continued to use its dedicated accommodation room for completing confidential assessments and other types of ergonomic assessments. The OCC used an interagency agreement with the Federal Occupational Health Agency to conduct ergonomic consultation and assessments (e.g., fitness for duty) in FY 2019, and will continue to do so in FY 2020.

**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 Treasury’s PAS policy and procedures, which follow the requirements established by the OPM. Training will be provided to all managers, supervisors, and selected HR professionals throughout FY 2020. In addition, the Treasury Department has procured a Treasury-wide PAS contract. This contract will allow the OCC to establish a purchase order against the Treasury-wide base contract. The OCC is currently working with the procurement office to set up our blanket purchase agreement with Treasury.

**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.

**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

<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>Lower than expected participation rate (percentage) of PWD in the following occupational series: National Bank Examiner (570), Attorney (905), Economist (110), and ITS (2210) compared with EEOC goal of 12 percent.</p>				
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p>				
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>					
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>Failure to consistently use specific outreach and recruitment strategies for PWD.</p>				
<p><b>Objective</b></p>	<p>Increase outreach and recruitment to PWD.</p> <table border="1" data-bbox="443 940 1503 1079"> <tr> <td data-bbox="443 940 646 995"><b>Date Objective Initiated</b></td> <td data-bbox="646 940 1503 995">Oct 1, 2005</td> </tr> <tr> <td data-bbox="443 995 646 1079"><b>Target Date For Completion Of Objective</b></td> <td data-bbox="646 995 1503 1079">Sep 30, 2022</td> </tr> </table>	<b>Date Objective Initiated</b>	Oct 1, 2005	<b>Target Date For Completion Of Objective</b>	Sep 30, 2022
<b>Date Objective Initiated</b>	Oct 1, 2005				
<b>Target Date For Completion Of Objective</b>	Sep 30, 2022				
<p><b>Responsible Officials</b></p>	<p>All Executive Committee Members Senior Deputy Comptroller Joyce Cofield Executive Director, Office of Minority and Women Inclusion</p>				

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/0018	Provide annual refresher training to HR Specialists about PWD hiring information.	Yes	09/30/0020	
09/30/0019	Improve applicant tracking to enable use for individual vacancy applicant pools.	Yes		09/30/0019
09/30/0018	The OCC encourages the servicing HR specialists and recruiters to have active discussions with hiring managers when determining area of consideration to fill vacancies. Educating hiring managers regarding available legal authorities and hiring flexibilities will allow managers to tap into a diverse and active talent pool without going through the lengthy traditional hiring process.	Yes		09/30/0019
09/30/0019	Host an in-house PWD information session near or on December 3, 2019, National Disability Day.	Yes	09/30/0020	
09/30/0020	Send out an email to all managers/supervisors as a reminder of all available special hiring authorities and resources in recruiting and hiring PWD and WRP positions.	Yes		
09/30/0018	Use the WRP Program as a source for recruiting PWD and a pipeline for permanent positions	Yes		09/30/0019
09/30/0018	The OCC will continue to look for ways to source positions for PWD in other job series (not identified in the trigger).	Yes		09/30/0019
09/30/0018	Establish and maintain relationships with organizations that assist PWD in securing and maintaining employment. These organizations include local colleges, universities, and professional organizations.	Yes		09/30/0019
09/30/0019	Explore opportunities for OCC representatives to present at a conference/recruitment event about careers in the federal government for PWD.	Yes	09/30/0020	
<b>Fiscal Year</b>	<b>Accomplishments</b>			
2019	<p>Between FY 2015 and FY 2019, PWD in mission-critical/major occupations (MCO)—bank examiners, attorneys, economists, and IT specialists—participated (6.1 percent) below the EEOC goal of 12.0 percent. In FY 2019, PWD increased participation in bank examiner (6.6 percent vs. 6.8 percent) and ITS specialist (10.5 percent vs. 10.6 percent) positions. PWD in MCO were hired (5.3 percent) from FY 2015 through FY 2019 on average below the EEOC goal of 12.0 percent. In FY 2019, 37.5 percent of the OCC hires with disabilities were in MCO, representing three bank examiners. There are limited hiring opportunities in the attorney and economist occupations. In addition, the OCC maintained its staffing priorities, resulting in fewer external hires in FY 2019, and it continued its focused effort on development and retention of the current workforce. Separations of PWD in MCO (7.5 percent) between FY 2015 and FY 2019 on average were above their workforce participation rate (6.1 percent). In FY 2019, the rate of separations of PWD in IT specialist (10.0 percent) and attorney (0.0 percent) positions were below their workforce participation rate (10.6 percent and 3.6 percent, respectively).</p>			

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

Refresher training and an in-house information session are planned for the second/third quarter FY 2020.

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 5.6 percent in FY 2015 to 9.1 percent in FY 2019. Applicant flow rates for PWD in the agency’s Entry-Level Examiner Program increased from 1.7 percent in FY 2015 to 2.1 percent in FY 2019. Applicant flow in FY 2019 (2.1 percent), resulted in a 3.6 percent external hiring rate of PWD. The OCC retained 68.4 percent of its non-competitive Schedule A hires from FY 2015 and FY 2019, and converted 70.6 percent of its eligible Schedule A hires since FY 2015. The SF-256 Resurvey Campaign in FY 2019 resulted in an increased participation rate of PWD in the workforce from 8.8 percent (334) to 9.0 percent (343).

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.