The Office of the Comptroller of the Currency's

FY 2020

Affirmative Action Plan

for the

Recruitment, Hiring, Advancement, and

Retention of Persons with Disabilities

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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   No

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

New B4-1 in Data Insight (DI): The participation rate for PWD in grade cluster GS-11 to SES was 8.97 percent in FY 2020, below the 12 percent goal.

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

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical Goal	--	12%		2%	
Grades GS-1 to GS-10	145	22	15.17	6	4.14
Grades GS-11 to SES	3390	304	8.97	61	1.80

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.gc
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
Architectural Barriers Act Compliance	7	1	3	Hans.Heidenreich@occ.trea
Processing reasonable accommodation requests from applicants and employees	1	0	0	Kelly.Battista@occ.treas.gc
Section 508 Compliance	88	0	0	Susan.Obrien@occ.treas.go

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 officer's technical representative 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 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. Two of the OCC's primary sources for Schedule A and veteran résumé searches are the use of the WRP's database and working closely with Treasury's Veteran Employment Office. OCC's Schedule A Program Manager (PM) continues to evaluate upcoming and current positions for marketing to veterans and PWD. We continue to leverage non-competitive hiring authorities and extend partnerships with veteran service organizations. The PM also received résumés via email from Schedule A applicants and forwarded them to the servicing HR specialists, as well as alerted candidates to submit their résumés online. The PM alerted both hiring managers and HR staffing specialists on the value of hiring external disabled applicants and available resources for locating such candidates.

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 minimally every three years. • Human Capital Fundamentals for New Managers: This training reviews the OCC's manager roles and responsibilities, providing guidance to help newly hired or promoted managers. Topics covered include competencies that are central to the manager's role and responsibilities in human capital management and HR processes that are essential to successfully performing supervisor functions (e.g., managing telework, administering leave, managing travel, and the use of hiring authorities including those that take disabilities into account). These sessions are offered two to three times a year for new managers.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

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

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

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

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

New B1 in DI: • PWD Hires: 10.71 percent vs. 12.0 percent • PWTD Hires: 1.79 percent vs. 2.0 percent Hiring rates for PWD and PWTD were below the Section 501 goal of 12.0 percent and 2.0 percent, respectively.

New Hires	Total	Reportable Disability	Targeted Disability

(#)	Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	1497	5.41	0.00	2.54	0.00
% of Qualified Applicants	874	3.66	0.00	1.72	0.00
% of New Hires	57	3.51	0.00	0.00	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 DI and the new B6 in Monster Analytics (Monster). NA in qualified applicant means Not Available. NH in hires means No Hire. FY 2020 Hires Qualified vs. Hires Qualified vs. Hires 0110: 3 Hires PWD: 4.26% - 0.0% PWTD: 4.26% - 0.00% 0570: 131 Hires PWD: 3.20% - 8.40% PWTD: 1.33% - 1.53% 0905: 2 Hires PWD: 7.89% - 0.00% PWTD: 3.95% - 0.00% The hiring rates for occupation series 0570 for PWD and PWTD were above their qualified applicant flow rates. Because the OCC has limited hiring of attorneys (0905) and economists (0110), there were not enough hires to determine if there is an actual trigger. With limited hiring, there cannot be a realistic expectation that all groups (PWD and PWTD) would be hired at rates comparable to their qualification rates.

New Hires to Mission-Critical Occupations	Total	Reportable Disability		Targetable Disability	
	(#)	Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	
0110ECONOMIST	3	66.67	0.00	66.67	0.00
0570BANK EXAMINER	16	150.00	12.50	62.50	0.00
0905ATTORNEY	2	300.00	0.00	150.00	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   No

        b. Qualified Applicants for MCO (PWTD)   Answer   No

New B6 in Monster. Relevant applicant pool is the applied compared with the qualified. NA in qualified applicant means Not Available and ND means No Data FY 2020 Promotions Applicants vs. qualified Applicants vs. qualified 0110: 0 Promotions PWD: ND - ND PWTD: ND - ND 0570: 1 Promotions PWD: 7.94% - 7.89% PWTD: 3.53% - 3.62% 0905: 0 Promotions PWD: 0.0% - 0.0% PWTD: 0.0% - 0.0% The OCC noted a slight difference (0.05 percent) in the occupational series 0570 when comparing the applicants with qualified candidates for PWD. The difference is less than 1 percent and not considered a trigger at this time. NOTE: The Treasury Department/OCC is currently working with its Workforce Analytics contractors to validate its data and align the guidance for internal competitive promotions requested from the EEOC.

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 DI and the new B6 in Monster. Compare qualified applicants with promotion in the MCOs. NS in employees' promotions means No Selection. NA in qualified applicant means Not Available and ND means No Data. FY 2020 Promotions Qualified vs Promotions Qualified vs Promotions 0110 (0) Promotions: PWD: ND - NS PWTD: ND - NS 0570 (1) Promotions: PWD: 7.89% - 0.00% PWTD: 3.62% - 0.00% 0905 (0) Promotions: PWD: 0.00% - NS PWTD: 0.00% - NS NOTE: The Treasury Department/OCC is currently working with its Workforce Analytics contractors to validate its data and align the guidance for internal competitive promotions requested from the EEOC.

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

    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 (%)
Fellowship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Internship Programs	88	6	1.14%	16.67%	0.00%	0.0%
Mentoring Programs	904	44	12.17%	13.64%	2.54%	0.00%
Coaching Programs	1551	164	6.84%	7.93%	2.00%	1.83%
Training Programs	3535	1255	9.22%	10.44%	1.90%	1.59%
Detail Programs	84	35	13.10%	14.29%	2.38%	0.0%
Other Career Development Programs	1732	122	62.30%	8.20%	N/A	2.46%

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   No

        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 1.23% 0.00% 2.06% 11-20 0.00% 0.00% 0.09% 21-30 0.00% 0.00% 0.06% 31-40 0.61% 1.49% 0.03% Awards PWD PWTD No Disability < $500 65.64% 77.61% 66.64% $501-999 39.57% 46.27% 35.20% $1000-1999 15.03% 17.91% 13.17% The inclusion rates for PWD and PWTD fell below the inclusion rates for employees with no disabilities in three time-off awards categories. The OCC noted differences in inclusion rates for PWD and PWTD time-off awards when comparing the inclusion rates of employees with no disabilities. The difference is less than 1 percent and it is not considered a trigger at this time. The inclusion rate for PWTD in the less than 10 hours (2.06 percent) time-off award category is more than 1 percent difference and it is considered a trigger at this time. The inclusion rate for PWD fell below the inclusion rates for employees with no disabilities in

the less than $500 cash award category. The difference is less than 1 percent and it is not a trigger at this time.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	69	1.23	2.06	0.00	1.54
Time-Off Awards 1 - 10 Hours: Total Hours	454	8.28	13.52	0.00	10.42
Time-Off Awards 1 - 10 Hours: Average Hours	6.58	2.07	0.21	0.00	2.61
Time-Off Awards 11 - 20 hours: Awards Given	3	0.00	0.09	0.00	0.00
Time-Off Awards 11 - 20 Hours: Total Hours	53	0.00	1.68	0.00	0.00
Time-Off Awards 11 - 20 Hours: Average Hours	17.67	0.00	0.56	0.00	0.00
Time-Off Awards 21 - 30 hours: Awards Given	2	0.00	0.06	0.00	0.00
Time-Off Awards 21 - 30 Hours: Total Hours	54	0.00	1.71	0.00	0.00
Time-Off Awards 21 - 30 Hours: Average Hours	27	0.00	0.85	0.00	0.00
Time-Off Awards 31 - 40 hours: Awards Given	3	0.61	0.03	1.49	0.39
Time-Off Awards 31 - 40 Hours: Total Hours	120	24.54	1.27	59.70	15.44
Time-Off Awards 31 - 40 Hours: Average Hours	40	12.27	1.27	59.70	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	1261	39.57	35.20	46.27	37.84
Cash Awards: $501 - $999: Total Amount	737086	22278.83	20690.66	27579.10	20907.72
Cash Awards: $501 - $999: Average Amount	584.52	172.71	18.61	889.64	-12.76
Cash Awards: $1000 - $1999: Awards Given	475	15.03	13.17	17.91	14.29
Cash Awards: $1000 - $1999: Total Amount	447147	12921.17	12586.20	16131.34	12090.73
Cash Awards: $1000 - $1999: Average Amount	941.36	263.70	30.26	1344.28	-15.84
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	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
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   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 DI and the new B7 Monster. NA in qualified applicant means Not Available. Relevant Applicants/Qualified/Promotions GS-13 - PWD: 11.79% - NA - 33.33% GS-14 - PWD: 10.92% - NA - 0.00% GS-15 - PWD: 7:40% - NA - 0.00% SES - PWD: 5.96% - 0.00% - 0.00% NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics.

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 DI and the new B7 Monster. NA in qualified applicant means Not Available. Relevant Applicants/Qualified/Promotions GS-13 - PWTD: 1.90% - NA - 0.00% GS-14 - PWTD: 2.08% - NA - 0.00% GS-15 - PWTD: 1.71% - NA - 0.00% SES - PWTD: 1.66% - 0.00% - 0.00% NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics.

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 - 21.21% GS-14 - PWD: NA - 11.11% GS-15 - PWD: NA - 0.00% SES - PWD: 0.00% - 0.00% NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics.

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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 – 0.00% GS-14 - PWTD: NA - 0.00% GS-15 - PWTD: NA - 0.00% SES - PWTD: 0.00% - 0.00% NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics.

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5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory
positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. 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 DI and the new B8 Monster. NA in qualified applicant means Not Available. Relevant Pool/Qualified Applicants/ Promotions Executives - PWD: 8.20% - 0.00% - 0.00% Managers - PWD: NA - NA - 0.00% There were no internal supervisor vacancy announcements or selections. NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics.

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   Yes

   ii. Internal Selections (PWTD)   Answer   No

   b. Managers

   i. Qualified Internal Applicants (PWTD)   Answer   No

   ii. Internal Selections (PWTD)   Answer   No

   c. Supervisors

   i. Qualified Internal Applicants (PWTD)   Answer   No

   ii. Internal Selections (PWTD)   Answer   No

New B8 DI and new B8 Monster. NA in qualified applicant means Not Available. Relevant Applicant/Qualified Applicants/ Promotions Executives - PWTD: 1.31% - 0.00% - 0.00% Managers - PWTD: NA - NA - 0.00% There were no internal supervisor vacancy announcements and selections. NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics. NOTE: The OCC has no "supervisors" in GS-12 and below equivalent grades. The OCC's supervisory/managerial positions begin at GS-13 and above equivalent levels.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box. 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   No

   b. New Hires for Managers (PWD)   Answer   No

   c. New Hires for Supervisors (PWD)   Answer   No

New B8 DI and new B8 Monster. NA in qualified applicant means Not Available. Qualified Applicants/Hires Executives - PWD: 0.0% - 0.0% Managers - PWD: NA - No hires There were no external supervisor vacancy announcements and selections. NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics. NOTE: The OCC has no "supervisors" in GS-12 and below equivalent grades. The OCC's supervisory/managerial positions begin at GS-13 and above equivalent levels.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box. 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 DI and new B8 Monster. NA in qualified applicant means Not Available. Qualified Applicants/Hires Executives - PWTD: 0.00% - 0.00% Managers - PWTD: NA - No hires There were no external supervisor vacancy announcements and selections. NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics. NOTE: The OCC has no "supervisors" in GS-12 and below equivalent grades. The OCC's supervisory/managerial positions begin at GS-13 and above equivalent levels.

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

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

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	9	0.61	0.22
Permanent Workforce: Resignation	100	4.28	2.67
Permanent Workforce: Retirement	109	3.98	2.99
Permanent Workforce: Other Separations	30	1.83	0.75
Permanent Workforce: Total Separations	248	10.70	6.63

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 (14.92 percent) exceeded the rate of persons without disabilities for voluntary (6.39 percent).

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	9	0.00	0.26
Permanent Workforce: Resignation	100	1.49	2.85
Permanent Workforce: Retirement	109	10.45	2.94
Permanent Workforce: Other Separations	30	2.99	0.81
Permanent Workforce: Total Separations	248	14.93	6.85

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

In FY 2020, there were four exit survey respondents with disabilities: one retired, two accepted other positions, and one left to continue their education. A large majority (75.0 percent) indicated they would recommend the OCC/Treasury as a good place to work. Also, 50.0 percent of the respondents indicated they generally had a positive work experience, would return to work for the OCC/Treasury, and there was nothing that could have been done to prevent them from leaving the agency. Six issues were cited equally by PWD as the primary reason for leaving (recognizing there were only four respondents): office morale; promotional practices; training opportunities; recognition of efforts, contributions, and achievements (relationship with supervisor); empowerment to improve performance (relationship with supervisor); and demonstration of skills and capabilities (work experience). In the agency-wide survey results, office morale was cited most often.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 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 2020, the OCC continued to work toward ensuring 508 users had necessary information communication technology to effectively perform their job. The OCC also worked with the Department of Defense Computer/Electronic Accommodations Program Center to secure an iPad for a hearing-impaired individual to use for real-time video interpretation. Additionally, the OCC launched a new employee network group, the Differently Abled Workforce Network, DAWN. The OCC also developed a Section 508 and 504 Awareness Training that enhanced employees' knowledge of accessibility programs. The eight-minute video gives a broad overview of the OCC's Section 508 and 504 compliance policies as well as real-world examples of OCC employees' experiences. It also provides resources to learn more about Sections 508 and 504.

C. REASONABLE ACCOMMODATION PROGRAM

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

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

7 business days or less

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

In FY 2020, 97 percent of RA requests were processed within the time frame set forth in the agency procedures. In addition, the agency provided assistive computing devices and technologies, software enhancements, and electric scooter support to assist employees with medical conditions. The OCC continued to use its dedicated accommodation room for completing confidential assessments and other types of ergonomic assessments. The OCC used an interagency agreement with the Federal Occupational Health Agency to conduct ergonomic consultation and assessments (e.g., fitness for duty) in FY 2020, and will continue to do so in FY 2021.

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

Pursuant to 29 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 OPM. In addition, the Treasury Department has procured a Treasury-wide PAS contract. This contract will allow the OCC to establish a blanket purchase agreement (BPA) against the Treasury-wide base contract. The OCC has set up its BPA with the procurement office to use these services when necessary.

Section 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.

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: Provide a brief narrative describing the condition at issue. 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: 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**
	Failure to consistently use specific outreach and recruitment strategies for PWD.	Failure to consistently use 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	09/30/2024	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 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		09/30/2020
09/30/2018	Establish and maintain relationships with organizations that assist PWD in securing and maintaining employment. These organizations include local colleges, universities, and professional organizations.	Yes		09/30/2020
09/30/2018	Provide annual refresher training to HR specialists about PWD hiring information.	Yes		09/30/2020
09/30/2018	Use the WRP Program as a source for recruiting PWD and a pipeline for permanent positions.	Yes		09/30/2020
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).	Yes		09/30/2020
09/30/2019	Explore opportunities for OCC representatives to present at a conference/recruitment event about careers in the federal government for PWD.	Yes		09/30/2020
09/30/2019	Improve applicant tracking to enable use for individual vacancy applicant pools.	Yes		09/30/2020
09/30/2019	Host an event to recognize National Disability Day and the launch of the Differently Abled Workforce Network (DAWN).	Yes		09/30/2020
09/30/2020	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		09/30/2020

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

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: Provide a brief narrative describing the condition at issue. 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 workforce participation rate.

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

Barrier Analysis Process Completed?:	Y
Barrier(s) Identified?:	Y

STATEMENT OF IDENTIFIED BARRIER: 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	Lack of consistent attention to career development and retention activities and programs that specifically support PWD.

Objective(s) and Dates for EEO Plan					
Date Initiated	**Target Date**	**Sufficient Funding / Staffing?**	**Date Modified**	**Date Completed**	**Objective Description**
10/01/2005	09/30/2024	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 ENGs and a variety of other communication venues throughout the agency.	Yes		09/30/2020

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		09/30/2020
09/30/2018	Managers will encourage PWD to participate in developmental opportunities that support their career goals at the OCC.	Yes		09/30/2020
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. Send managers a quarterly email reminder regarding their employees' eligibility to convert to competitive service.	Yes		09/30/2020
09/30/2019	Hold annual self-identification campaigns during National Disability Employment Awareness Month.	Yes		09/30/2020
09/30/2019	Implement pre-launch publicity activities (e.g., write FAQs and announcements, publicize in all OCC employee electronic media, host focus groups) to result in the launch of a disabilities ENG. Partner with Leadership, Executive, and Organizational Development (LEOD) and Continuing Education (CE) to a) ensure concerns associated with PWD are considered in course development. b) enhance OCC courses with language that clearly is more inclusive of PWD.	Yes	09/30/2021	09/30/2020
09/30/2020	Publish semiannually 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		
09/30/2020	Educate all employees and managers/supervisors at least once a year (each) on the reasonable accommodation process by partnering with DAWN and OMWI by various educational methods, such as • hosting webinars, brown-bag lunches, workshops, and/or panel discussions. • featuring and spotlighting relevant topics, stories, and/or videos in SuperVisions, WNOCC, and on OCCnet.	Yes		
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		

Report of Accomplishments	
Fiscal Year	**Accomplishment**
2020	The participation rates of PWD in career development programs were generally absent or below their relevant workforce participation rates from FY 2013 through FY 2019. However, in FY 2020, PWD exceeded their workforce participation in several career development programs, including the following: EXCEL I (20.0 percent vs. 8.1 percent), Executive Coaching Program (7.9 percent vs. 6.8 percent), Leadership courses (13.9 percent vs. 9.2 percent) and internal career developmental courses (10.4 percent vs. 9.2 percent).

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

N/A

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

Participation rates for PWD have gradually increased over the last five years, from 6.2 percent in FY 2016 to 9.2 percent in FY 2020. In FY 2020 (as of August 25, 2020), the applicant flow rate for PWD was 13.4 percent and the selection rate was 6.0 percent. While the applicant flow rate exceeded the EEOC goal of 12.0 percent, the selection rate fell below the goal. The OCC retained 81.3 percent of its non-competitive Schedule A hires from FY 2016 and FY 2020 and converted 75.0 percent of its eligible Schedule A hires since FY 2016.

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.