

**Office of the Comptroller of the Currency
(OCC)**

Fiscal Year 2022

**Management Directive (MD-715)
Report**

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MD-715
Parts A Through E

Part A - Department or Agency Identifying Information

Agency	Second Level Component	Address	City	State	Zip Code (xxxxx)	Agency Code (xxxx)	FIPS Code (xxxx)
Department of Treasury	Office of the Comptroller of the Currency (OCC)	Constitution Center, 400 7 th Street, SW	Washington	DC	20219	TR AJ	11001

Part B - Total Employment

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	3462	12	3474

Part C.1 - Head of Agency and Head of Agency Designee

Agency Leadership	Name	Title
Head of Agency	Michael J. Hsu	Acting Comptroller of the Currency
Head of Agency Designee		

Part C.2 - Agency Official(s) Responsible for Oversight of EEO Program(s)

EEO Program Staff	Name	Title	Occup. Series (xxxx)	Pay Plan and Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
Principal EEO Director/Official	Joyce Cofield	Executive Director	0301	NB-08	202-649-6892	Joyce.Cofield@occ.treas.gov
Affirmative Employment Program Manager	Joyce Cofield	Executive Director	0301	NB-08	202-649-6892	Joyce.Cofield@occ.treas.gov

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EEO Program Staff	Name	Title	Occup. Series (xxxx)	Pay Plan and Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
Complaint Processing Program Manager	Rebecca Tudisco	EEO Officer	0260	NB-06	202-649-6893	Rebecca.Tudisco@occ.treas.gov
Diversity & Inclusion Officer	Tamara Brooks	Diversity & Inclusion Program Manager	0301	NB-06	202-649-6527	Tamara.Brooks@occ.treas.gov
Hispanic Program Manager (SEPM)	Sandra Hernandez	Hispanic Employee Network Group President/Senior International Advisor	0570	NB-06	202-649-6829	Sandra.Hernandez@occ.treas.gov
Women's Program Manager (SEPM)	Tanya Oskanian	Women's Network President/National Bank Examiner	0570	NB-06	202-649-5792	Tanya.Oskanian@occ.treas.gov
Disability Program Manager (SEPM)	Rachel Bayless	Disability Employee Network Group President/Assistant Deputy Comptroller	0570	NB-07	972-277-9658	Rachel.Bayless@occ.treas.gov
Special Placement Program Coordinator (Individuals with Disabilities)	Harnet Reddy	Selective Placement Program Coordinators/Human Resources Specialists (Recruitment)	0201	NB-05	202-649-5264	Sam.Reddy@occ.treas.gov
	Natasha Schmidt				202-649-6662	Natasha.Schmidt@occ.treas.gov
Reasonable Accommodation Program Manager	Kelly Battista	Reasonable Accommodation Coordinator	0260	NB-05	202-649-6636	Kelly.Battista@occ.treas.gov
Anti-Harassment Program Manager	Linda Medina	Anti-Harassment Program Manager/Human Resources Specialist	0201	NB-05	202-649-6638	Linda.Medina@occ.treas.gov
ADR Program Manager	Cheryl Lewis	Equal Employment Specialist	0260	NB-06	202-649-7175	Cheryl.Lewis@occ.treas.gov
Compliance Manager	N/A					

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EEO Program Staff	Name	Title	Occup. Series (xxxx)	Pay Plan and Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
Principal MD-715 Preparer	Valerie Tucker	Program Analyst (EEO)	0343	NB-05	202-649-6460	Valerie.Tucker@occ.treas.gov
Other EEO Staff						

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Part D.1 – List of Subordinate Components Covered in this Report

Please identify the subordinate components within the agency (e.g., bureaus, regions, etc.).

If the agency does not have any subordinate components, please check the box.

Subordinate Component	City	State	Country (Optional)	Agency Code (xxxx)	FIPS Codes (xxxxx)
Northeastern District Office	New York	NY			
Central District Office	Chicago	IL			
Southern District Office	Dallas	TX			
Western District Office	Denver	CO			
Large Bank Supervision	Nationwide				
Headquarters	Washington	DC			

Part D.2 – Mandatory and Optional Documents for this Report

In the table below, the agency must submit these documents with its MD-715 report.

Did the agency submit the following mandatory documents?	Please respond Yes or No	Comments
Organizational Chart	Yes	
EEO Policy Statement	Yes	
Strategic Plan	Yes	
Anti-Harassment Policy and Procedures	Yes	
Reasonable Accommodation Procedures	Yes	
Personal Assistance Services Procedures	Yes	
Alternative Dispute Resolution Procedures	Yes	

In the table below, the agency may decide whether to submit these documents with its MD-715 report.

Did the agency submit the following optional documents?	Please respond Yes or No	Comments
Federal Equal Opportunity Recruitment Program (FEORP)	Yes	

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Did the agency submit the following optional documents?	Please respond Yes or No	Comments
Report		
Disabled Veterans Affirmative Action Program (DVAAP) Report	Yes	
Operational Plan for Increasing Employment of Individuals with Disabilities under Executive Order 13548	Yes	
Diversity and Inclusion Plan under Executive Order 13583	Yes	
Diversity Policy Statement	No	
Human Capital Strategic Plan	Yes	
EEO Strategic Plan	No	
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	Yes	

Part E – Executive Summary

All agencies must complete Part E.1; however, only agencies with 199 or fewer employees in permanent FT/PT appointments are required to complete Part E.2 to E.5. Agencies with 200 or more employees in permanent FT/PT appointments have the option to complete Part E.2 to E.5.

Part E.1 - Executive Summary: Mission

The Office of the Comptroller of the Currency (OCC), created in 1863, charters, regulates, and supervises all national banks and federal savings associations as well as supervises and licenses the federal branches and agencies of foreign banks. The OCC is an independent, non-appropriated bureau of the U.S. Department of the Treasury. Its mission is to ensure that these institutions operate in a safe and sound manner, provide fair access to financial services, treat customers fairly, and comply with applicable laws and regulations. While bank supervision is the core mission of the OCC and the majority of its employees are bank examiners, examination and supervision activities are supported by a variety of other professions.

Part E.2 - Executive Summary: Essential Element A - F

The OCC is a second-level reporting component of the Treasury Department. Treasury has directed the OCC to leave section E.2 blank.

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Part E.3 - Executive Summary: Workforce Analyses

As of October 8, 2022, the OCC had 3,474 employees (3,462 permanent and 12 temporary). This number reflects a decrease of 2.2 percent below the 3,551 employees (3,547 permanent and 4 temporary) in FY 2021. The participation of females in the workforce (43.8 percent) increased slightly from the FY 2021 rate of 43.7 percent. Generally, most minority demographic groups experienced incremental increases to their workforce percentages. In addition, the OCC's disability workforce increased in FY 2022 to 10.5 percent from 9.6 percent in FY 2021, while persons with targeted disabilities increased by 0.05 percentage points.

In FY 2022, the OCC's disability workforce participation rate in the GS-01 through GS-10 equivalent grade cluster (10.5 percent) increased from the FY 2021 rate of 9.8 percent but remains below the Equal Opportunity Commission (EEOC) goal of 12.0 percent. The targeted disability workforce participation rate in this grade cluster decreased in FY 2022 to 1.4 percent from 1.8 percent in FY 2021, remaining below the EEOC goal of 2.0 percent. The disability workforce participation rate in the GS-11 through senior executive service (SES)¹ grade cluster for FY 2022 was 10.3 percent, an increase from the 9.6 percent in FY 2021. This grade cluster also falls below the EEOC goal of 12.0 percent. The targeted disability workforce participation rate in this grade cluster also increased from 1.8 percent in FY 2021 to 1.9 percent in FY 2022, below the EEOC goal of 2.0 percent.

When reviewing the OCC's workforce demographics, benchmark comparisons are made against the 2014-2018 availability rates for the national civilian labor force (NCLF)² and the occupational civilian labor force (OCLF) for the OCC's three major occupational groups—bank examiners, attorneys, and economists. In addition, the Treasury Department provides a more realistic benchmark comparison for the OCC's overall workforce than the NCLF rate—known as the relevant civilian labor force (RCLF). The RCLF rate is based on the OCC's annual occupational composition and total workforce. The 2022 RCLF rate was calculated by comparing the OCLF availability rate from the 2010 census data with the percentage availability rate of each occupation represented in the OCC's workforce as of October 8, 2022.

The FY 2022 workforce participation rates for females and minorities in the OCC's three major occupational groups were as follows: bank examiners (females at 37.7 percent, below the OCLF of 45.8 percent, and minorities at 28.2 percent, above the OCLF of 23.1 percent); attorneys (females at 49.1 percent, above the OCLF of 37.1 percent, and minorities at 25.5 percent, above the OCLF of 16.7 percent); and economists (females at 30.8 percent, below the OCLF of 32.0 percent, and minorities at 43.9 percent, above the OCLF of 23.6 percent). Females and minorities in the OCC's GS-03 through GS-12 equivalent grade groupings exceeded their workforce participation rates (females at 49.0 percent vs. 43.8 percent and minorities at 41.8 percent vs. 36.9 percent). Comparatively, females and minorities in the OCC's GS-13 and GS-14 equivalent grade groupings, GS-15 equivalent, and SES equivalent grade groupings were below their workforce participation rates:

- GS-13 and GS-14 equivalent grade groupings: females, 42.3 percent vs. 43.8 percent; and minorities, 36.7 percent vs. 36.9 percent.

¹ GS-1 through GS-12 equivalent grades are cross-walked from the OCC's NB-I through NB-IV grades by base salary. GS-13 is equivalent to NB-V, GS-14 is equivalent to NB-VI, GS-15 is equivalent to NB-VII, and SES/senior-level position (SLP) grades are equivalent to NB-VIII and NB-IX grades.

² NCLF data are derived from the U.S. Census Bureau's 2014-2018 American Community Survey reflecting persons 16 years of age or older, excluding those in the Armed Services. FY 2022 is the first year the 2014-2018 comparator has been used. The EEOC released this interim comparator until the 2020 census is released in the near future.

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- GS-15 equivalent grade: females, 40.2 percent vs. 43.8 percent; and minorities, 26.1 percent vs. 36.9 percent.
- SES equivalent grades: females, 38.8 percent vs. 43.8 percent; and minorities, 32.7 percent vs. 36.9 percent.

Part E.4 - Executive Summary: Accomplishments

In 2021, the Office of Personnel Management (OPM) delayed the Federal Employee Viewpoint Survey (FEVS) administration to start the week of November 1, 2021. The number of core items administered in 2021 was reduced again this year from 71 to 38, and over 13 COVID-19 items were added to assess agencies' response to the pandemic and return to the worksite. The results of the survey were shared with agencies in late January 2021. The OCC's Employee Engagement Index remained the same at 78 percent for 2021. The Global Satisfaction Index decreased from 76 percent in 2020 to 75 percent in 2021. The results for the New Inclusion Quotient survey only computed nine out of the 20 items for the survey and decreased to 74 percent compared with 75 percent in 2020.

The Partnership for Public Service uses a calculated proprietary weighted formula to analyze data from the FEVS to create "The Best Places to Work in the Federal Government" rankings. The OCC had an index score of 75.6 in 2021 (compared with 79.2 in 2020), placing the agency 144 out of 432 agency subcomponents.

The OCC's award-winning training and development programs have been recognized for "harnessing human capital" through investment in employee development, the scope of its development program, and the close link between the OCC's development efforts and its strategic objectives. The OCC's efforts through the Leadership Institute have been recognized for their work on a competency model and curriculum for every level of leadership within the OCC, and for their innovative Leadership Foundations course, which supports the agency's vision for institutionalizing leadership development into the OCC's culture.

OCC 2022 Areas of Focus

During this reporting cycle, the OCC continued to address the following areas in which deficiencies, triggers (disparities), and barriers were identified in FY 2021:

- 1) Increasing the use of EEO-alternative dispute resolution (ADR) during the equal employment opportunity (EEO) pre-complaint process.
- 2) Increasing the Anti-Harassment Program Prompt Inquiry.
- 3) Increasing the participation and retention of Hispanics in the agency.
- 4) Increasing the participation of Hispanics in leadership positions.
- 5) Improving career progression and fostering a more inclusive environment for Hispanics.
- 6) Increasing the participation of female bank examiners.
- 7) Increasing the participation of females and minorities in supervisor roles and senior-level positions (SLP).
- 8) Increasing the participation of individuals with disabilities.

1) Increasing the Use of EEO-ADR During the EEO Pre-Complaint Process

The Department of the Treasury's goal is to process 45.0 percent of completed EEO pre-complaints using ADR in lieu of traditional EEO counseling. The OCC offers EEO-ADR services to all eligible participants. In FY 2022, the OCC's EEO-ADR participation rate was 50.0 percent, which exceeded the goal and was an increase from 42.9 percent in FY 2021. Of the 16 cases completed in FY 2022, 11 (68.8 percent) were

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eligible for EEO-ADR (eight participated and three declined) and 31.2 percent (five of the 16 cases) were ineligible for EEO-ADR based on the OCC's ADR policy (three non-employees and two external applicants). The OCC's policy provides that the following cases are ineligible for EEO-ADR: cases involving an anonymous complainant; non-selection of an external applicant for employment; termination, including termination during a trial/probationary period, or other non-employees; criminal activity; and waste, fraud, or abuse. Of the 11 eligible cases in FY 2022, eight, or 72.7 percent, participated in EEO-ADR, compared with 56.3 percent in FY 2021 (of 16 eligible cases, nine participated in EEO-ADR). Furthermore, the resolution rate in FY 2022 was 50.0 percent; eight of 16 completed pre-complaints did not become formal EEO complaints.

The OCC continues to promote its ADR Program as an alternative means of conflict resolution. An introduction to the ADR Program is included, for some lines of business, in mandatory training for new employee hires and new managers and supervisors, as well as for the entire workforce in the biennial mandatory No FEAR Act training. Dispute Prevention Week was not observed in FY 2022 because of the COVID-19 pandemic. Actions to improve the EEO-ADR participation rate are described in Part H.

2) Increasing the Anti-Harassment Program Prompt Inquiry.

In FY 2022, the OCC reviewed and identified areas for more efficiency and clarity related to the Anti-Harassment Policies and Procedure Manual. Annual training on safe workplaces and preventing sexual harassment was modified and posted for employees and managers. Also, the OCC's Continuing Education (CE) unit began developing micro-modules to increase the frequency of mandatory orientation sessions being conducted for new managers; and mandatory training for managers related to Merit System Principles, Prohibited Personnel Practices. Additionally, an EEO/diversity performance element remains a part of the annual review for managers.

3) Increasing the Participation and Retention of Hispanics in the Agency

The OCC continues its efforts to address the low participation rate of Hispanics in its workforce. In FY 2022, the Hispanic participation rate slightly increased to 8.1 percent from 8.0 percent in FY 2021, an improvement from 5.1 percent in the OCC's FY 2005 baseline year. The OCC's Hispanic workforce participation rate (8.1 percent) remains below the NCLF rate of 13.0 percent, but above parity with the RCLF rate of 7.1 percent. Hispanics separated (8.8 percent) above their workforce participation rate (8.1 percent).

The overall workforce participation rate of Hispanics is influenced by their low participation in the OCC's non-major occupational groups (e.g., IT specialists, personnel management, and management/program analysis). Hispanic non-major occupational groups participated below their workforce participation rate (8.4 percent vs. 13.0 percent NCLF rate), although there has been recent improvement as a result of lower separation rates. For FY 2022, hiring rates of Hispanics in non-major occupational groups were below the NCLF (10.8 percent vs. 13.0 percent), and below the FY 2021 hire rate of 12.3 percent. However, separations of Hispanics in non-major occupational groups remained below their workforce participation rate (7.3 percent vs. 8.1 percent) in FY 2022.

In addition, the OCC's overall low participation rate of Hispanics is influenced by (a) the need to build a stronger pipeline of Hispanic entry-level bank examiners, and (b) the low retention of Hispanic bank examiners. Recently, there has been improvement in both areas. For FY 2022, Hispanic entry-level bank examiners were hired above their 2014-2018 OCLF (12.7 percent vs. 8.5 percent). In terms of retention, Hispanic entry-level bank examiners separated below their workforce participation rate and were retained their first year of employment at 88.0 percent.

No applicant flow analysis was conducted on the entry-level bank examiner recruitment campaign in 2022 or on job vacancies that closed in FY 2022, due to anomalies in the data that compromised the accuracy and integrity of the data results. FY 2022 was a transitional year with the applicant tracking system.

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Treasury transitioned from Monster Analytics to USA Staffing for managing Treasury-wide and bureau-level (to include the OCC) applicant flow data. Treasury identified significant differences between Monster Analytics and USA Staffing impacting Treasury's ability to collect and track applicant flow data.³

In FY 2022, the OCC maintained the Hispanic Recruitment Working Group with members from the Hispanic Organization for Leadership and Advancement (HOLA), the Human Capital Recruitment Team, and the Office of Minority and Women Inclusion (OMWI) to review the Hispanic recruitment strategy. The group continued to expand contact with Hispanic accounting, finance, and business-related organizations and clubs at colleges and universities to increase the Hispanic applicant pool for entry-level examiner positions. In addition, with the assistance of HOLA, the OCC sponsored 20 virtual sessions and six in-person sessions. The OCC also hosted four career webinars to amplify opportunities to entry-level Hispanic students. These efforts helped to increase the number of district financial interns from two in FY 2021 to 28 in FY 2022, of which 14.3 percent were Hispanics, above the 2014-2018 OCLF of 8.5 percent. The working group will also focus on more strategic recruitment efforts for experienced examiners and non-examiners.

HOLA members also served as recruiters and screeners during the entry-level bank examiner recruitment campaigns. In FY 2022, HOLA and The Women's Network (TWN) hosted two assistant national bank examiner (ANBE) career webcasts at targeted colleges and universities, titled "A Career Worth Examining." A special HOLA flyer was created to attract the interest of Hispanics. HOLA members also represented the agency at various career forums and job fairs. In addition, HOLA published a blog, *Hablando con HOLA*, shared relevant information on career discussions, and spotlighted HOLA members in different leadership roles through various communications, including its website and emails to members.

The OCC will continue its focus in this area in FY 2023. Actions to increase the participation of Hispanics in the agency are described in Part I.

4) Increasing the Participation of Hispanics in Leadership Positions

In FY 2022, Hispanics in SLP and supervisor positions slightly decreased by 0.4 percentage points (6.1 percent) and 0.1 percentage points (7.0 percent), respectively. Both groups remained below their workforce participation rate of 8.1 percent. Six (19.4 percent) Hispanics were promoted to GS-15 equivalent positions (NB-VII). Two Hispanic females were also temporarily promoted to GS-15 equivalent positions (NB-VII).

No applicant flow analysis was conducted on vacancies closed in FY 2022 by ethnicity and grade levels GS-13 through SES equivalent grades due to anomalies in the data which compromised the accuracy and integrity of the data results. FY 2022 was a transitional year with the applicant tracking system.⁴

HOLA is working with the OCC's Enterprise Workforce Planning Director and the Hispanic Barrier Analysis (HBA) Program Manager on building an interview panel pool with knowledge of the core duties

³ Monster Analytics provided applicant flow data regardless of whether or not a certificate was audited; on the contrary, USA Staffing only shows applicant flow data if the hiring process is closed and the certificates are marked as "audited." While auditing certificates is a required step in the hiring process, Treasury discovered that audits may not have been completed for all hires in FY 2022. For example, in one occupational series, Treasury workforce data show over 400 new hires, but USA Staffing shows zero for that occupational series. Treasury's Office of Civil Rights and Equal Employment Opportunity (OCRE) is working with Treasury's Enterprise Data Management (EDM) team to develop a process for more efficient and accurate data transfer between USA Staffing and Treasury systems. Treasury is hopeful that the process will be in place prior to the end of FY 2023. Based on the challenges identified and given Treasury's commitment to provide accurate and reliable data, Treasury, on behalf of the OCC as a second-level reporting component, made the decision to exclude applicant flow data from the FY 2022 MD-715 submission. OCRE is hopeful that efforts made in FY 2023 will provide Treasury the opportunity to submit accurate applicant flow data for the FY 2023 report.

⁴ See footnote above.

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of the job and comprising of a diverse group of individuals across the agency.

The OCC will continue its focus in this area in FY 2023. Actions to increase the participation of Hispanics in the agency are described in Part I.

5) Improving Career Progression and Fostering a More Inclusive Environment for Hispanics

In FY 2022, Hispanics participated in several management, leadership, and career developmental programs to improve their career progression and advancement in the agency. Hispanics continued to participate in programs such as Executive Coaching (7.4 percent) and one Hispanic participated in the EXCEL I Program.

Hispanic examiners also participated in developmental opportunities as Training Team Leaders and Training Team Assistants (7.1 percent) to new entry-level ANBE hires in FY 2022.

The OCC continued to benefit from the activities of its Hispanic employee network group (ENG), HOLA. In FY 2020, HOLA established an ANBE Mentorship Cadre focused on new ANBE hires for their first year, which it continued in FY 2022. The goal of the ANBE Mentorship Cadre is to enhance the early career experience and retention of Hispanic bank examiners. HOLA continues to offer its original platform of "Career Coaching," in which members are paired with internal coaches who provide advice on available career paths, career progression, résumé writing, interviews, and training opportunities. In addition, HOLA continues to offer its "Speak to Lead" initiative, which provides HOLA members with real-time feedback on mock exit or board meeting presentations. HOLA also collaborates with other ENGs to disseminate listings of job opportunities to promote career advancement.

The HBA Program Manager, HOLA, and OMWI continued to partner on the HBA Project and provided a progress report to the Executive Committee and the Acting Comptroller to keep raising awareness of the need to increase Hispanic participation at the OCC. To raise awareness of HOLA's mission, key organizational changes, and opportunities with Hispanic recruitment and retention, HOLA gave a presentation at the agency's all-employee town hall meeting. HOLA hosted three teleconferences under its "Speaker Series," on the OCC's Leadership Exploration and Development (LEAD) Program, mentorship and sponsorship, and career coaching.

HOLA expanded the diversity of opportunities for individuals to interact in meaningful ways and build team rapport across the agency. They launched a quarterly brown bag series in FY 2022 titled "Overcoming Cultural Stereotypes" that helps individuals connect across the agency and supports a culture of engagement and inclusion at all levels. HOLA also launched monthly beginner and intermediate Spanish classes in FY 2022 to provide more opportunities for individuals to interact across the agency and build rapport.

Two of HOLA's advisory council members and HOLA Communication Committee members (HCC), and one HCC member were selected as recipients of the OCC's 2021 Honorary Award for Excellence in Diversity and Inclusion (awarded in 2022). Each of them championed principles of diversity, inclusion, and equal employment opportunity.

The OCC will continue its focus in this area in FY 2023. Actions to increase the participation of Hispanics in the agency are described in Part I.

6) Increasing the Participation of Female Bank Examiners

The OCC's population of female bank examiners slightly declined in FY 2022 to 37.7 percent, from 37.8 percent in FY 2021, and remains below the OCLF rate of 45.8 percent. The hiring rate of 31.4 percent for

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female bank examiners was below the OCLF rate (45.8 percent). No applicant flow analysis was conducted of the 2022 entry-level recruitment campaign or of the examiner vacancies closed in FY 2022 due to anomalies in the data which compromised the accuracy and integrity of the data results. FY 2022 was a transitional year with the applicant tracking system. Treasury transitioned from Monster Analytics to USA Staffing for managing Treasury-wide and bureau-level (to include the OCC) applicant flow data. Treasury identified significant differences between Monster Analytics and USA Staffing impacting Treasury's ability to collect and track applicant flow data.⁵

During FY 2022, female bank examiners separated at a rate (36.3 percent) below their workforce participation rate (37.7 percent), but above their hiring rate (31.4 percent) in the current fiscal year.

Of separating female bank examiners in FY 2022, resignations represented 50.6 percent (an increase of 14.1 percentage points from FY 2021); retirements accounted for 44.9 percent (a decrease of 15.4 percentage points from FY 2021); and terminations/other comprised 4.5 percent. In FY 2022, of the resignations, 42.2 percent were new hires (six or fewer years of employment), down by 31.7 percentage points from FY 2021, and 57.8 percent were mid-career employees (not new hires and not eligible for retirement).

In FY 2022, the retirement eligibility pool (currently eligible and expected to obtain eligibility within five years) for female bank examiners was 26.0 percent (the lowest since FY 2010), compared with an average of 28.9 percent over the past five years. Because of the years of historical growth in the retirement eligibility pool before FY 2017, as well as the resignations and transfers of new hires, retention of female bank examiners remains a challenge and therefore will continue to be monitored in the future.

Job stress, workload, pay, and travel requirements were the reasons most often cited by separating female bank examiners in the FY 2022 exit surveys, which are comparable with agency-wide survey results. By identifying the areas of greatest concern for female bank examiners, the OCC can better understand contributing factors, target retention efforts, and develop strategies that align with the agency's overall mission and diversity and inclusion goals.

The OCC offers flexible work arrangements, including flex days, gliding work schedules to enable varying arrival and departure times, makeup time, credit hours, and telework arrangements. A majority of employees take advantage of these work arrangements: 84.0 percent flex, 71.0 percent vary their work schedules, and 93.7 percent telework, with 71.0 percent of employees teleworking three or more days per pay period during the last fiscal year (FY 2021). In June 2022, the OCC began its return to on-site operations using a hybrid approach.

The OMWI continued to work collaboratively with bank supervision management to identify barriers that could impede the realization of diversity goals specifically affecting female bank examiners. Management briefings highlighted departmental workforce trends and areas requiring special attention, including targeted recruitment, retention strategies, and succession planning.

Bank Supervision management sponsored two surveys (at on-boarding and 12 months) with entry-level bank examiners to capture their feedback on the agency's hiring and on-boarding processes, training programs, on-the-job experiences during their first year, and perceptions of OCC examiner culture. Information sessions are facilitated, and information collected by the OCC's Organizational Development (OD) unit and the resultant feedback are shared with Midsize and Community Bank Supervision (MCBS) senior management and the Examinations/Examiner Development group. OD consultants used surveys and virtual focus groups to gather feedback and prepare summaries for each hiring round, which include

⁵ OCRE is working with the EDM team to develop a process for more efficient and accurate data transfer between USA Staffing and Treasury systems. Based on the challenges identified and Treasury's commitment to provide accurate and reliable data, Treasury, on behalf of the OCC as a second-level reporting component, made the decision to exclude applicant flow data from the FY 2022 MD-715 submission. OCRE is hopeful that efforts made in FY 2023 will provide Treasury the opportunity to submit accurate applicant flow data for the FY 2023 MD-715 report.

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highlights of the main findings. The feedback gathered is used by MCBS to improve its training team and new examiner development processes and examination work. Survey results for FY 2022 will be analyzed and presented to management by the end of the year (FY 2023).

The OCC's MCBS department sponsors Uniform Commission Examination (UCE) Recognition Events in local OCC offices, followed by a virtual senior deputy comptroller meeting and district event for bank examiners in pay band NB-V positions who recently passed the UCE. The main focus of the events is to provide newly commissioned bank examiners with exposure to the career choices available in the bank supervision lines of business, provide them with resources and factors to consider when making OCC career decisions, and enable them to learn more about leadership development.

In FY 2022, three UCE testing sessions were held. Seventy-nine bank examiners passed, of whom 34.2 percent (27) were female, down from 39.3 percent in FY 2021. In addition, 8.9 percent (7) were Black, 3.8 percent (3) were Hispanic, 2.5 percent (2) were Asian, and 8.9 percent (7) were individuals with disabilities. Females, Asians, and Hispanics passed the UCE in FY 2022 at rates below their FY 2021 rates.

The EXCEL I Program, sponsored by the Large Bank Supervision (LBS) department, provides NB-V bank examiners with the opportunity to develop expertise in one of eight specialty areas. Interested bank examiners apply for permanent bank examiner positions within LBS and become part of a developmental team in one of the specialty areas for a 12- to 24-month period. Upon successful completion of the program, candidates remain in LBS to work within their specialty areas as members of a large bank resident team. In FY 2022, 11 bank examiners were selected in EXCEL I classes: 36.4 percent (4) were female, 27.3 percent (3) were Black, 9.1 percent (1) were Hispanic, 9.1 percent (1) were Asian, and 9.1 percent (1) were individuals with disabilities. Females, Hispanics, and individuals with disabilities participated at rates below their relevant workforce participation rates.

The OCC has long benefited from the value provided by The Women's Network (TWN) employee resource group. In FY 2022, the Recruitment Team and TWN established a working group to identify and conduct research on colleges and universities whose student population consisted of a substantial percentage of women and/or are considered women's colleges. TWN also served as recruiters/screeners during the entry-level bank examiner recruitment campaigns, targeted colleges and universities, and represented the agency at various career forums and job fairs. TWN and HOLA hosted two ANBE career webcasts at targeted colleges and universities titled "A Career Worth Examining." In addition, in FY 2022, TWN supported the focused retention of female bank examiners through its mentoring circles that included topics such as "Career Exploration," "Uniform Commission Examination Preparation," and "Leadership." During the Women's History Month observance, TWN's guest speaker spoke on "The Great Resignation," and TWN, along with three large bank teams, facilitated discussion groups on diversity, equity, and inclusion. TWN also hosted peer mentoring sessions (Midday Refresh calls) on topics including career management and work life navigation, and hosted an event titled "Where Do You Go to Learn." TWN published three newsletters, hosted three mentoring events, continued its Resource Group Mentoring Program with two resource groups—"Managing Your Career" and "Work Life Navigation"—and promoted TWN events in OCC-wide internal communications.

The OCC will continue its focus in this area in FY 2023. Actions to increase the participation of female bank examiners in the agency are described in Part I.

7) Increasing the Participation of Females and Minorities in Supervisor Roles and SLP

In FY 2022, females participated at 43.8 percent in the OCC workforce and held 41.5 percent of supervisor positions and 38.8 percent of SLP, up from FY 2021 participation rates by 1.8 percentage points for SLP. Minorities participated in the workforce at 36.9 percent and held 31.6 percent of supervisor positions and 32.7 percent of SLP, up from FY 2021 participation rates by 0.9 percentage points in supervisor positions and 2.3 percentage points in SLP.

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The agency's Acting Comptroller recognizes and values the benefits of diversity in its management structure and continues to lead senior-level discussions about how to improve the diversity of candidate slates for hiring and promotion.

The OCC continued to offer the Executive Development Roadmap for employees interested in becoming an OCC executive and who may benefit from some navigational assistance. The roadmap is targeted for GS-14 and GS-15 equivalent (NB-VI and NB-VII) employees. It is intended to be another tool in the leadership journey toolbox that provides tips, resources, and best practices to support aspiring leaders as they prepare to seek executive opportunities. In FY 2022, the Executive Development Framework was expanded to include the following: 1) a new onboarding process for first-year executives, 2) a Microsoft Teams channel for executives/deputy comptrollers, and 3) a piloted Executive Development Program for SES equivalent positions (NB-VIII and NB-IX) for FY 2023.

OCC employees also participated in Executive Development courses, which are external executive/leadership courses. These courses are offered through numerous respected institutions and are designed to further expand executive competence in key areas. In FY 2022, nine employees participated in Executive Development courses—22.2 percent (2) were female, and 66.7 percent (6) were minorities; 88.9 percent (8) were supervisors and 100.0 percent (9) were in SLP and feeder grades, GS-15 through SES equivalent grades (NB-VII and above). In addition, the OCC Leadership Institute, in collaboration with OMWI, delivered a two-day vendor-led virtual executive leadership workshop for 15 women in SES equivalent positions (NB-VIII and NB-IX).

In addition, the OCC continued to administer a robust Executive Coaching Program, sponsored the Leadership Institute Speaker's Series, and held informational Manager Forums to educate managers on various leadership development topics. In FY 2022, 162 employees participated in the Executive Coaching Program—53.1 percent (86) were female, and 37.7 percent (61) were minorities; 44.4 percent (72) were supervisors and 32.7 percent (53) were in SLP and feeder grades, GS-15 through SES equivalent grades (NB-VII and above). The OCC also revamped two leadership courses for managers/supervisors and team leaders to include modules on diversity and inclusion components.

The Treasury Executive Institute (TEI) provides programs on a variety of leadership competencies (e.g., communication, conflict management, diversity) that support continuous learning and development. The OCC extended these learning opportunities to employees in GS-13 and above equivalent grades (NB-V and above). In FY 2022, 230 employees participated in TEI programs—60.4 percent (139) were female, and 32.6 percent (75) were minorities; 30.4 percent (70) were supervisors and 22.6 percent (52) were in GS-15 and above equivalent grades (NB-VII and above). The OCC also made available courses at the Institute for Management Studies. Virtual management and leadership webinars for managers and mid-level professionals are featured noting thought leaders, academics, researchers, and consultants. Approximately 140 employees participated in leadership, management, communication, and engagement courses.

The OCC will continue its focus in this area in FY 2023. Actions to address the disparity of minorities and females in supervisor positions and SLP are described in Part I.

8) *Increasing the Participation of Individuals with Disabilities*

In FY 2022, the workforce participation rate of individuals with disabilities increased to 10.5 percent from 9.6 percent in FY 2021 but remained below the EEOC's goal of 12.0 percent. Individuals with disabilities were hired at rates above the EEOC goal (12.1 percent) in FY 2022 and separated at rates (9.7 percent) below their participation in the workforce (10.5 percent) and their hiring rate (12.1 percent).

No applicant flow analysis was conducted on job vacancies closed in FY 2022 due to anomalies in the data which compromised the accuracy and integrity of the data results. FY 2022 was a transitional year

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with the applicant tracking system. Treasury transitioned from Monster Analytics to USA Staffing for managing Treasury-wide and bureau-level (to include the OCC) applicant flow data. Treasury identified significant differences between Monster Analytics and USA Staffing impacting Treasury's ability to collect and track applicant flow data.⁶

The low workforce participation rate of individuals with disabilities overall is largely influenced by low participation in the agency's mission-critical/major occupations (MCO)—bank examiners, attorneys, economists, and information technology (IT) specialists. In FY 2022, MCO employees represented 78.7 percent of the agency's workforce collectively. Individuals with disabilities in MCO (7.9 percent) participated below the EEOC goal of 12.0 percent in FY 2022.

In FY 2022, individuals with disabilities in MCO were hired (8.4 percent) below the EEOC goal of 12.0 percent; and their separation rate (8.4 percent) was above their workforce participation rate (7.9 percent) and their FY 2021 separation rate of 7.0 percent.

The participation rates of individuals with disabilities in career development programs improved over the last five years and specifically in FY 2022. Historically, individuals with disabilities were generally absent or below their relevant workforce participation rates for more than five years in career development programs. In FY 2022, individuals with disabilities exceeded their workforce participation in all career development programs, except the LEAD Cohort III Program.

In FY 2022, the Differently Abled Workforce Network (DAWN) established a successful and well attended Sunshine Seminar Series consisting of the following events: 1) "Disability Etiquette – Interacting with People Who are Differently Abled," featuring a panel of DAWN members, 2) "Introduction to Invisible Disabilities," featuring a guest speaker, and 3) "Supporting the Education of Children/Youth with Disabilities," featuring two guest speakers along with a panel of DAWN members. DAWN also participated with the Veterans Employee Network (VEN) to host four "Coffee Break" sessions that covered topics such as mental and physical health awareness, career development resources, and physical growth. In addition, DAWN began curating a comprehensive and multi-faceted Caregivers Toolbox, which will be published in early FY 2023 (October 2022), to serve as a one-stop shop for members to learn about various resources for caregivers of people with disabilities. DAWN's Caregivers Committee is also partnering with TWN to facilitate caregivers' discussions/meetings for both ENG's.

Additionally, to raise awareness of DAWN's mission and goals, key organizational changes, and opportunities for recruitment and retention of disabled employees, DAWN gave a presentation at the agency's all-employee Town Hall meeting. DAWN also made presentations to one of the OCC's senior management groups, two leadership teams, a disability recruitment campaign/fair, and a diversity, equity, and inclusion meeting to inform them of the organization's mission and goals.

In FY 2022, a VEN Working Group was established, comprised of members from VEN, OMWI, and the Recruitment Team, which meets regularly to generate ideas to increase veteran and disabled veteran hiring. The VEN Working Group participated and helped coordinate veterans outreach and support, found participants to represent the agency at military-focused career fairs, connected recruiters with student veteran organizations, and explored other opportunities to increase the hiring of veterans at the OCC. Additionally, VEN wrote a position paper and engaged Office of Human Capital (HC) leaders to educate OCC managers and supervisors, as well as employees, on the USAJobs website's veteran and military spouse hiring path functionality, to encourage use of such functions to provide better outreach to recruit from those communities.

⁶ OCRE is working with the EDM team to develop a process for more efficient and accurate data transfer between USA Staffing and Treasury systems. Based on the challenges identified and Treasury's commitment to provide accurate and reliable data, Treasury, on behalf of the OCC as a second-level reporting component, made the decision to exclude applicant flow data from the FY 2022 MD-715 submission. OCRE is hopeful that efforts made in FY 2023 will provide Treasury the opportunity to submit accurate applicant flow data for the FY 2023 MD-715 report.

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The OCC's cross-functional Disability Working Group continued to manage the framework for the Disability Program and provided input into the agency's Disability Barrier Plan and its Affirmative Action Plan for Persons with Disabilities, described in Part J of this report. In FY 2022, the working group continued to partner with key stakeholders to execute the action plan. Also, the working group reassessed the Disability Barrier Plan to ensure its continued accuracy; modifications were made to the plan.

In addition to the agency's efforts to hire individuals with disabilities, in FY 2022 the OCC continued to enhance its existing training design, development, and delivery methods to ensure that all educational deliverables and live instructional events are compliant with section 508 of the Rehabilitation Act of 1973 (508-compliant) and accessible for individuals with disabilities. Enhancement efforts included (1) ensuring that all new course development activities and major revisions will be fully compliant when delivered, and (2) maintaining process standards for all course development and design work that include adherence to 508 standards and testing to verify compliance. Efforts involved maintenance and development of over 85 508-compliant learning solutions in FY 2022, including virtual classrooms, instructional videos, webinars, eLearning, structured reading programs, and guidance materials. Additionally, the OCC's Leadership Institute worked with Treasury contractors to revamp three of the OCC's leadership courses to ensure 508 compliance.

The OCC continued to work toward ensuring 508 users had necessary information and communication technology to effectively perform their jobs and provided technical assistance when needed. One-on-one training was provided to 508 users to ensure the individuals were using assistive technologies in the most efficient and effective manner. Training was also provided to OCC's Editorial and Design Services personnel for checking their work product accessibility.

Actions to increase the participation of individuals with disabilities, particularly in MCO within the agency, are described in Part J, "Affirmative Action Plan for Persons with Disabilities."

Additional Noteworthy 2022 Accomplishments

The OCC accomplished the following:

- Held a Manager's Forum Inclusion Event, co-sponsored by OMWI and the OCC's Leadership Institute, where the guest speaker (a leadership, inclusion, and engagement expert) helped participants gain a common understanding of what is true, science-based inclusion. More than 300 executives and managers participated in the session.
- Offered a virtual training course titled "Unconscious Bias: From Insight to Action," and five additional unconscious bias training courses. A total of 312 employees participated in all six courses. Of these employees, 47.8 percent (149) were female, 14.1 percent (44) were Black, 7.1 percent (22) were Hispanic, 4.2 percent (13) were Asian, 1.6 percent (5) were Small Ethnicity Race Indicator (ERI) groups, 9.0 percent (28) were individuals with disabilities, and 48.1 percent (150) were supervisors.
- Maintained the Career Development Center to provide career coaching, learning events, networking opportunities, individual development planning, mentoring, workshops, and related resources to OCC employees to assist them in reaching their full potential while maximizing their contributions to the agency. Employees utilizing the center take personal responsibility for managing their careers, and in turn the OCC provides resources to support their efforts. The Career Development Center has seen exponential growth and demand for career services in FY 2022, including mock interviews, résumé reviews, individual development plan (IDP) consultations, career assessments, and career coaching and career path exploration. Appointments have nearly tripled since FY 2020. Services were offered on an individual basis and a group basis through numerous outreach events including career fairs,

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ENG events, team meetings, and other formats. In maintaining the center, the OCC

- ✓ utilized the IDP Dashboard to provide managers with automated weekly coming-due or overdue reminder notifications. Updated the FY 2023 IDP form functionality to automatically copy the employee's manager on the final submitted copy of the IDP, which serves as additional validation that the form was submitted to the repository. The OCC will transition the IDP process to the Integrated Talent Management (ITM) system in the future, which will bring many benefits including (1) aligned development goals and activities, (2) tracked automatic activities for online and internal courses, (3) improved tracking capabilities, and (4) established real-time manager dashboards. The OCC launched a pilot of the new process in the ITM in FY 2022 within its CE unit for approximately 50 employees. In FY 2023, the pilot will expand to approximately 120 more participants outside the CE unit. Agency-wide rollout is expected in FY 2024. Each fiscal year, all OCC employees are strongly encouraged to submit IDPs for supervisor discussion and review. Of those who submitted IDPs, the following indicated on their IDP that they aspire to the next leadership level: 38.7 percent were female, 16.6 percent were Black, 11.0 percent were Asian, 9.5 percent were Hispanic, 1.2 percent were from Small ERI groups, 9.5 percent were individuals with disabilities, and 13.2 percent were supervisors.
- ✓ continued to offer the "Career Development Conversations" course to help facilitate career discussions between employees and managers, a course in which 104 employees participated. Of these employees, 47.1 percent (49) were female, 12.5 percent (13) were Black, 9.6 percent (10) were Asian, 6.7 percent (7) were Hispanic, 8.7 percent (9) were individuals with disabilities, and 54.8 percent (57) were supervisors.
- ✓ launched the One-on-One Mentoring Program pilot in July 2022. The system matched 37 mentees with mentors. This exceeded the initial plan of 25 mentoring pairs due to high interest in the program. In addition to using the Mentoring module, program administrators developed a Mentoring Toolkit as a one-stop-shop resource for mentors and mentees. The Toolkit is available in the ITM Learning module and includes a meeting tracker, meeting discussion guides, the program orientation video, mentoring agreement, and mentoring resources. Of the 74 employees who participated in the Mentoring Program (mentees and mentors), 66.2 percent (49) were female, 18.9 percent (14) were Asian, 18.9 percent (14) were Black, 9.5 percent (7) were Hispanic, 1.4 percent (1) were from Small ERI groups, 14.9 percent (11) were individuals with disabilities, and 25.7 percent (19) were supervisors.
- Offered flash mentoring, through the ENGs and the Leadership Institute, to over 75 employees, during which a one-time meeting or discussion was held with a small group of individuals to facilitate learning and seeking guidance from more experienced employees with relevant knowledge and experiences.
- Continued to sponsor LEAD, an enterprise-wide leadership development program targeted at employees in the NB-V to NB-VI.2 levels. LEAD is an 18-to-24-month program designed to build leadership competencies for aspiring team leaders and managers and to foster broader, enterprise perspectives for participants. LEAD supports the OCC's retention goals by strengthening leadership capabilities and providing career development for aspiring leaders. In FY 2022, efforts continued to develop the participants who were selected for the LEAD Cohort II Program in FY 2020. In addition, in FY 2022, the LEAD Cohort III Program was sponsored, and participants were selected. There were 11 participants, of whom 45.5 percent (5) were female and 9.1 percent (1) were Black. All EEO groups, except females, participated below their relevant workforce participation rates.
- Offered the "Women in Leadership" course, designed to build influencing skills for existing and emerging women leaders. The course explores the gender dynamics of organizational influence, enhances awareness of personal influencing strengths, builds new influencing skills, and provides

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tools for increasing the ability of women leaders to effect interpersonal and organizational change. Employees also participated in two additional women in leadership training courses. A total of 51 employees participated in all three courses. Of these employees, 92.2 percent (47) were female, 21.6 percent (11) were Black, 5.9 percent (3) were Hispanic, 9.8 percent (5) were Asian, 2.0 percent (1) were from Small ERI groups, 5.9 percent (3) were individuals with disabilities, and 9.8 percent (5) were supervisors.

- Sponsored over 25 leadership outreach activities for OCC employees, including executives and managers. Topics included career development, leadership, IDPs, the LEAD Program, strategic thinking and problem solving, and résumé and interview preparation.
- Held three Manager Forums with a total of 1,190 attendees on topics related to performance management, reasonable accommodation, and conducting fair and defensible interviews.
- Awarded four minority females and two minority males, in 2022, the “Excellence in Diversity and Inclusion Award” in recognition of their contributions in 2021 toward championing the principles of diversity, inclusion, and EEO. Two awards were given to the current presidents of TWN and DAWN and two awards were given to former HOLA presidents. Also, the LBS Council for Diversity and Inclusion and the Uniform Commission Examination Accommodations Team received awards.
- Continued hiring students as part of the High School Scholars Internship Program (HSSIP), providing a six-week paid internship to 42 students to explore a variety of career paths at the OCC, gain an understanding of the financial services industry, and engage in enrichment activities on financial literacy and leadership fundamentals. This year’s program also included 10 former HSSIP interns who are now college students. Despite the continuing challenges of the COVID-19 pandemic, the OCC offered a virtual experience to enable the agency to continue to provide interns with a positive and enriching experience.
- Maintained the Office of Management’s (OM) Diversity, Equity, Inclusion, and Accessibility (DEIA) Advocate Team. OM’s DEIA Advocates serve as a sounding board for the OM leadership and identify strategies and tactics for DEIA execution. In FY 2022, the Advocate Team accomplishments included: finalizing their vision statement; strengthening their partnership with employee network groups; establishing an “Honor Our Diversity and Inclusion Heroes”; strengthening collaboration through their “I Am OM, We Are OM” video; and developing workplace reentry principles for OM.
- Established the LBS Council for Diversity and Inclusion in 2021 that fosters a deliberative and overarching approach to inclusion, enabling LBS team members to bring their full, authentic selves to the workplace. The council influences and promotes LBS management’s efforts to cultivate an inclusive environment by developing and implementing programs that increase awareness, understanding, commitment, and action. The council’s accomplishments in FY 2022 included: revision of LBS operating policies to require diversity in interview panels; increased LBS team member involvement through expression of interests opportunities to take action on the council’s goals, objectives, and vision; continuation of the Conversation Series addressing various topics related to diversity and inclusion (“Unconscious Bias” and “Gender Identity”); increased LBS engagement for OCC examiner recruitment and hiring; and more robust LBS career and leadership development processes. The LBS Council for Diversity and Inclusion consists of senior LBS managers.
- Launched an MCBS task group in 2021 focused on diversity and inclusion relative to employee recruitment, onboarding, and retention through career development and advancement. Efforts included data gathering, analysis, and reporting; policy and process reviews; and employee focus groups. FY 2022 achievements included policy and process reviews associated with recruitment and

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post-onboard training teams; a diversity and inclusion dashboard with meaningful quantitative data for semi-annual management-level reports using ethnicity, race, and gender indicators; facilitating two virtual career fairs informing employees of upcoming promotion opportunities and the offering of more alternate location positions; and conducting employee focus groups to collect qualitative data as to how well career progression goals are being met and supported within MCBS. The task group is expected to finalize recommendations and dissolve in FY 2023.

- Drafted the OCC's DEIA Implementation Plan to foster engagement, inclusion, and belonging for all employees. This effort, titled the "Moments That Matter" project, was informed by benchmarking with other federal agencies and private industry, and collecting data from the workforce by means of focus groups, a follow-up survey, and government-wide pulse surveys. In FY 2023, the OCC will present to the workforce its DEIA Implementation Plan. The purpose of this Implementation Plan is to fulfill our commitment to advancing diversity, equity, inclusion, and accessibility efforts as highlighted in the agency's Strategic Plan FY 2023–2027 and in the spirit of Executive Order (EO) 14035, "Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce."
- Established a Gender and Identity Expression Strategy Task Group composed of members from OCC's lesbian, gay, bisexual, and transgender employee network group, PRIDE, and OMWI. The group drafted a multiyear action plan for integration into the DEIA Implementation Plan and created a tip sheet for the OCC's Ombudsman's Customer Assistance Group on inclusive and nondiscriminatory language to use in communication with consumers.
- Held the LBS Diversity Conversation on Gender Identity with a panel discussion that included senior LBS leadership as part of LBS Council for Diversity and Inclusion's quarterly "Conversation Series." Over 200 employees participated.

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Part E.5 - Executive Summary: Planned Activities

In FY 2023, the OCC will continue to address the following areas of deficiencies, triggers (disparities), and barriers identified in this year's report:

- 1) Increasing the use of ADR during the EEO pre-complaint process.
- 2) Increasing the Anti-Harassment Program Prompt Inquiry.
- 3) Increasing the participation and retention of Hispanics in the agency.
- 4) Increasing the participation of Hispanics in leadership positions.
- 5) Improving career progression and fostering a more inclusive environment for Hispanics.
- 6) Increasing the participation of female bank examiners.
- 7) Increasing the participation of females and minorities in supervisor roles and SLP.
- 8) Increasing the participation of individuals with disabilities.

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**CERTIFICATION of ESTABLISHMENT of CONTINUING
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS**

I, Joyce B. Cofield am the
(Insert name above) (Insert official title/series/grade above)

Principal EEO Director/Official for Office of the Comptroller of the Currency (OCC)
(Insert Agency/Component Name above)

The agency has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and, as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program, are included with this Federal Agency Annual EEO Program Status Report.

The agency has also analyzed its work force profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice is operating to disadvantage any group based on race, national origin, gender or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.

Joyce B Cofield Digitally signed by Joyce B Cofield
Date: 2023.01.12 14:28:31 -05'00'

Signature of Principal EEO Director/Official
Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.

Date

Michael J. Hsu Digitally signed by Michael J. Hsu
Date: 2023.01.24 14:13:35 -05'00'

Signature of Agency Head or Agency Head Designee

Date

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MD-715 – Part H
Agency EEO Plan to Attain the Essential Elements of a Model EEO Program

Please describe the status of each plan that the agency has implemented to correct deficiencies in the EEO program.

If the agency did not address any deficiencies during the reporting period, please check the box.

Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Efficiency	<p>For FY 2010, the U.S. Department of the Treasury’s goal was that at least 35.0 percent of those entering the equal employment opportunity (EEO) informal complaint process participate in alternative dispute resolution (ADR); the OCC’s participation rate in FY 2010 was 29.4 percent (five of 17). In FY 2012, the Treasury Department increased the participation goal to 45.0 percent.</p> <p>In FY 2022, the OCC’s participation rate exceeded the goal of a 45.0 percent participation rate. The FY 2022 rate increased from the previous year’s rate of 42.9 percent to 50.0 percent (eight of 16 completed cases). Additionally, 50.0 percent of completed cases were resolved during the pre-complaint process regardless of whether ADR was used, i.e., a formal complaint was not filed in one out of two cases.</p>

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
11/01/2010	Increase ADR participation rate during the EEO pre-complaint process to meet the Treasury Department’s goal.	09/30/2024	10/01/2018	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Executive Director, Office of Minority and Women Inclusion	Joyce Cofield	Yes

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Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2017	Continue to provide information on ADR to employees through the new hire orientation and other employee briefings.	Yes		09/30/22
09/30/2017	Continue to review information available when EEO-ADR was offered but not accepted and analyze reasons why EEO-ADR was declined.	Yes		09/30/22
09/30/2017	Continue to use and analyze feedback provided on ADR participant surveys.	Yes		09/30/22
03/31/2017, 09/30/2017	Continue to conduct EEO briefings with Executive Committee members, and include information on EEO-ADR at the OCC.	Yes		09/30/22
09/30/2018	Highlight ADR in a revised module in the mandatory No FEAR Act training.	Yes		09/30/22
09/30/2019	Participate in the Treasury-wide ADR Working Group, organized to assist bureaus to improve ADR participation rates and improve settlement rates, via resource developed for an ADR tool chest and sharing ADR best practices.	Yes		09/30/22

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2022	In FY 2022, the OCC experienced an increase in its EEO-ADR participation rate. This year's EEO-ADR participation rate was 50.0 percent, which exceeded the goal and was an increase from 42.9 percent in FY 2021. Of the 16 cases completed in FY 2022, 11 (68.8 percent) were eligible for EEO-ADR (eight participated and three declined) and 31.2 percent (five of the 16 cases) were ineligible for EEO-ADR based on the OCC's ADR policy (three non-employees and two external applicants). The OCC's policy provides that cases involving an anonymous complainant; non-selection of an external applicant for employment; termination, including termination during a trial/probationary period, or other non-employees; criminal activity; and waste, fraud, or abuse, are ineligible for EEO-ADR. Of the 11 eligible cases

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FY 2022	<p>in FY 2022, eight, or 72.7 percent, participated in EEO-ADR, compared with 56.3 percent in FY 2021 (of 16 eligible cases, nine participated in EEO-ADR). Furthermore, the resolution rate in FY 2022 was 50.0 percent; eight of 16 completed pre-complaints did not become formal EEO complaints.</p> <p>The OCC continues to promote its ADR Program as an alternative means of conflict resolution. An introduction to the ADR Program is included, for some lines of business, in mandatory training for new employee hires and new managers and supervisors, as well as for the entire workforce in the biennial mandatory No FEAR Act training. The OCC will continue its outreach to supervisors, staff, and union representatives to promote the benefits of electing ADR in the EEO pre-complaint process. Also, the OCC will continue successful past activities and monitor activities as they are implemented. Dispute Prevention Week was not observed in FY 2022 because of the COVID-19 pandemic.</p>
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MD-715 – Part H
Agency EEO Plan to Attain the Essential Elements of a Model EEO Program

Please describe the status of each plan that the agency has implemented to correct deficiencies in the EEO program.

If the agency did not address any deficiencies during the reporting period, please check the box.

Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Efficiency	The agency missed the compliance indicator for the anti-harassment program when it did not conduct a prompt inquiry (beginning within 10 days of notification).

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/1/2020	Address competing priorities and timely reporting	09/30/2023		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Director for Workforce Relations & Performance Management Division	Eric Adams	Yes
Manager for Workforce Relations & Performance Management Division	Jurmell James	Yes
Labor and Employee Relations Specialist	Linda Medina	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
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12/31/2020	Modify and post for employees and managers the annual training on safe workplaces and preventing sexual harassment.	Yes		12/31/21
9/30/2021	Modify the anti-harassment policy for compliance with whistleblower protection consistent with statutory requirements.	Yes		02/14/22
9/30/2021	Continue to include for managers an equal employment opportunity (EEO)/diversity performance element as an annual review.	Yes		09/30/22
9/30/2021	Conduct mandatory orientation sessions for new managers, including merit system principles, prohibited personnel practices.	Yes	09/30/23	
9/30/2021	Periodic review of the Anti-Harassment Policy and Procedure Manual.	Yes		09/30/22

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2022	Reviewed and identified areas for more efficiency and clarity related to the Anti-Harassment Policy and Procedure Manual.
	Modified and posted for employees and managers the annual training on safe workplaces and preventing sexual harassment.
	Continued inclusion of an EEO/diversity performance element as an annual review for managers.
	Development of micro-modules by Continuing Education is under way to increase the frequency of mandatory orientation sessions conducted for new managers; and mandatory training for managers related to merit system principles, prohibited personnel practices conducted.
	Implemented adjustments to the investigatory re-competed contract that complements the robustness of our current program consistent with results from the benchmarking survey.
	Implemented a streamlined interface with Acquisitions Management in the re-competed investigatory contract that allows for the Contracting Officer's Representative to have more authority to take action without the Contracting Officer's prior authorization.
	Implemented language in the re-competed contract to require contemporaneous inquiries to be conducted promptly and to require the availability of multiple investigators.

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MD-715 – Part I
Agency EEO Plan to Eliminate Identified Barrier

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

If the agency did not conduct barrier analysis during the reporting period, please check the box.

Statement of Condition That Was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables Workforce Data Tables Five-Year Trend Analysis	A1, A6, and A8S	<p>The representation of Hispanic female bank examiners and Hispanic employees in non-major occupational groups in the OCC is lower than expected when compared with their participation in the occupational civilian labor force (OCLF) and national civilian labor force (NCLF).</p> <p>In FY 2022, Hispanic female bank examiners represented 2.9 percent of the OCC’s workforce, compared with the 2014-2018 OCLF rate of 4.6 percent. Hispanics in non-major occupational groups represented 8.4 percent of the workforce, compared with the 2014-2018 NCLF rate of 13.0 percent.</p>

EEO Group(s) Affected by Trigger

EEO Group
All Men
All Women
Hispanic or Latino Males Yes
Hispanic or Latino Females Yes
White Males
White Females
Black or African American Males
Black or African American Females
Asian Males
Asian Females
Native Hawaiian or Other Pacific Islander Males
Native Hawaiian or Other Pacific Islander Females

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EEO Group
American Indian or Alaska Native Males
American Indian or Alaska Native Females
Two or More Races Males
Two or More Races Females

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Reviewed Tables A1, A6, and A8S to track the participation pattern across demographic profiles of Hispanic bank examiners and Hispanic employees in non-major occupational groups to determine if there is growth in their participation rates.
Complaint Data (Trends)	Yes	Reviewed complaints trend data to determine if Hispanics raised common issues.
Grievance Data (Trends)	Yes	Reviewed grievance data to determine any trends in cases raised by Hispanic employees.
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	Reviewed grievance data on selections to determine any trends in cases raised by female and minority employees.
Climate Assessment Survey (e.g., FEVS)	Yes	Reviewed the questions and responses that support the diversity and inclusion index for Hispanics in the Federal Employee Viewpoint Survey (FEVS).
Exit Interview Data	Yes	Reviewed responses from Hispanics to determine common reasons for leaving the agency, and their work experiences.
Focus Groups	Yes	Reviewed Hispanic focus group data results on their work experiences, retention, and career development of Hispanic employment in the OCC.
Interviews	Yes	Reviewed interview data from various groups (e.g., Hispanic Organization for Leadership and Advancement (HOLA), recruiters, interviewers/panelists, staffing specialists, hiring officials) regarding their experiences and opinions concerning the low representation, career development, and retention of Hispanic employment in the OCC.

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Reviewed several federal and private sector reports and reports of special interest groups (e.g., Government Accountability Office (GAO), Equal Employment Opportunity Commission (EEOC), Merit Systems Protection Board (MSPB), National Hispanic Leadership Agenda, Diversity Conference, and Corporate Executive Board) to gain additional information on best practices and solutions for addressing low participation of Hispanics in the OCC's workforce.
Other (Please Describe)	Yes	<p>Post recruitment, analyze the number of Hispanic applicants for entry-level bank examiner positions and their movement through the recruitment process.</p> <p>Compared the OCC's workforce data on Hispanic examiners with data on Hispanic students with conferred B.A. and M.A. business degrees to assess the diversity sufficiency of educational sourcing pools.</p> <p>Conducted a 17-year retention analysis of race and national origin groups.</p> <p>Prepared a five-year trend analysis of the workforce data tables.</p>

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
Yes	Yes

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
<p>The low workforce participation rate of Hispanics is influenced by their low participation in the OCC's bank examiner (females) and non-major occupational groups, and the low retention of entry-level examiners until years seven through 10, when the gap narrowed with non-Hispanics. Our analysis indicates that Hispanic female bank examiners were hired at levels below the OCLF rates. Hispanics in non-major occupational groups were also hired at levels below the NCLF rates.</p>

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Objective(s) and Dates for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Increase the participation of Hispanic entry-level bank examiners and Hispanics in non-major occupational groups, e.g., contract specialists, human resources (HR) specialists, and accountants.	10/01/2004	09/30/2029	Yes	06/30/2020	
Improve the retention of Hispanic entry-level bank examiners year 1.	10/01/2004	09/30/2029	Yes	06/30/2020	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
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 (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/18	Analyze effectiveness of the Hispanic Recruitment Strategy to recruit Hispanics in entry-level bank examiner positions and non-major occupational groups, e.g., contract specialists, HR specialists, and accountants.		09/30/22
09/30/18	Continue to further develop strong relationships with college campuses and with organizations, associations, clubs, and groups on campus that have Hispanic students, such as Beta Alpha Psi (BAP) and Association of Latino Professionals for America (ALPFA).		09/30/22
09/30/18	Work with lead recruitment specialists to ensure there are targeted programs for attracting Hispanic		09/30/22

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Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
	talent to the OCC.		
09/30/18	Participate in the ALPFA national and regional conferences and meetings.		09/30/22
09/30/18	Continue to analyze and use research data from National Association of Colleges and Employers (NACE) on accounting and finance graduating classes and the demographic make-up of the student bodies to help determine which schools the OCC will recruit from to build a qualified and diverse applicant pool of Hispanics.		09/30/22
09/30/18	Continue to explore ways to expand applicant pools for non-major occupational positions (e.g., Hispanic-populated job fairs, internships, Hispanic associations).		09/30/22
09/30/18	Recruit students using the financial internship program for Midsize and Community Bank Supervision (MCBS).		09/30/22
09/30/18	Continue to support the work of HOLA's Human Capital (HC) Committee, designed to offer HOLA's input into the OCC's efforts to recruit, retain, and advance Hispanics in the workforce.		09/30/22
09/30/18	HOLA members will participate in OCC outreach at the annual conferences of Latin American organizations, including League of United Latin American Citizens (LULAC) and UnidosUS, formerly La Raza.	09/30/23	
09/30/18	To strengthen retention efforts, HOLA will participate in OCC employee network group events to provide employees with opportunities for networking and learn more about HOLA's goals, programs, and activities.		09/30/22
09/30/19	Extend a focused full-time, temporary Diversity and Inclusion Program Manager role that will address the identified deficiencies by planning and implementing activities to improve hiring and employment practices and ensure the full participation of Hispanics in the OCC's workforce.		09/30/22
06/30/20	Maintain a Recruitment Working Group, with members of the Recruitment team, HOLA, and OMWI, to collaborate on recruitment efforts for entry-		09/30/22

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Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
	level examiners and non-major occupational groups.		
06/30/20	Implement action items in the Hispanic Barrier Analysis (HBA) Action Plan related to the focus areas on recruitment and retention that are applicable.		09/30/22

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2022	<p>In FY 2022, addressing the low participation rate of Hispanic employees remained a priority for the OCC. The overall percentage of Hispanics increased from 8.0 percent in FY 2021 to 8.1 percent in FY 2022, a 3.0 percentage point improvement over the FY 2005 rate of 5.1 percent. The OCC's overall Hispanic participation rate, however, remains significantly below the 2014-2018 NCLF rate of 13.0 percent. When compared with the relevant CLF (RCLF) rate of 7.1 percent, Hispanic participation overall is above parity. Hispanic separations were above their workforce participation rate (8.8 percent vs. 8.1 percent) in FY 2022, a greater percentage than in FY 2021 (6.4 percent).</p> <p>The low participation rate of Hispanics in non-major occupational groups continued to be a major influence in the overall disparity of Hispanics in the agency. The percentage of Hispanics in non-major occupational groups increased to 8.4 percent in FY 2022 from 8.0 percent in FY 2021, although rates remain below the 2014-2018 NCLF rate of 13.0 percent. In FY 2022, Hispanic males in these groups participated at 3.3 percent in the workforce, compared with 6.8 percent in the NCLF, a 0.1 percentage point decrease from FY 2021. Hispanic females in these groups participated at 5.2 percent in the workforce, compared with 6.2 percent in the NCLF, a 0.6 percentage point increase from FY 2021.</p> <p>The hiring rate of Hispanics in non-major occupational groups was below the NCLF rate (10.8 percent vs. 13.0 percent) in FY 2022. Bank examiner (11.0 percent vs. 8.5 percent) and attorney (42.9 percent vs. 5.6 percent) hires in FY 2022 exceeded their OCLF. No Hispanic economists were hired in FY 2022.</p> <p>Hiring of Hispanics as human resources (HR) specialists and contract specialists has been far below their OCLF for over 10 years. In FY 2022, one Hispanic female HR specialist was hired, and no Hispanic contract specialists were hired.</p> <p>In FY 2022, the participation of Hispanic HR specialists was 8.7 percent, below the 2014-2018 OCLF (11.4 percent), but above the FY 2021 rate of 6.7 percent. Hispanic contract specialists remained absent from the</p>

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<p align="center">FY 2022</p>	<p>workforce, below their OCLF of 8.9 percent.</p> <p>In FY 2022, separations were below the workforce participation rate (7.3 percent vs. 8.1 percent) for Hispanics in non-major occupational groups.</p> <p>The OCC's overall low participation rate of Hispanics is also influenced by the low retention of Hispanic bank examiners and the need to build a stronger pipeline of Hispanic entry-level bank examiners.</p> <p>The HBA that was completed in FY 2020 reflected that the Entry-Level Bank Examiner Recruitment Program continued to be a significant source for Hispanic hiring at the aggregate level at the OCC, although this was not the case in each of the agency's four districts. More strategic recruitment strategies are under way to address the differences. In FY 2022, 12.7 percent (7) of the entry-level bank examiners self-identified as Hispanic overall, above the 8.5 percent 2014-2018 OCLF, but slightly below the FY 2021 rate of 13.1 percent.</p> <p>Hispanic entry-level bank examiners separated below their workforce participation rate (8.1 percent vs. 9.7 percent) in FY 2022, less than in FY 2021—8.8 percent separations vs. 9.5 percent workforce participation rates. Also, in FY 2021 – 2022, 88.0 percent of Hispanic entry-level bank examiners were retained in Year 1, compared with 80.0 percent with the HBA baseline years (FY 2018 - 2020).</p> <p>In FY 2022, Hispanic female bank examiners were participating below their OCLF rate (2.9 percent vs. 4.6 percent), while males participated at rates exceeding their OCLF rate (5.1 percent vs. 3.9 percent), above their FY 2021 rate of 4.9 percent. Over the last fiscal year, the percentage of Hispanic bank examiners increased slightly to 8.0 percent from 7.9 percent in FY 2021.</p> <p>Hispanic bank examiners were hired at a rate greater than their OCLF rate (11.0 percent vs. 8.5 percent), but less than their FY 2021 rate of 12.8 percent. Separations were above their workforce participation rate for Hispanic bank examiners (9.0 percent vs. 8.0 percent).</p> <p>FY 2022 was a transitional year with applicant tracking data blended from Monster Analytics and USA Staffing data collection systems. This resulted in anomalies in the data which compromised the accuracy and integrity of the data results. Accordingly, no applicant flow data analysis will be performed of the entry-level bank examiner recruitment campaign in 2022 or on job vacancies that closed in FY 2022.⁷</p> <p>The Hispanic Recruitment Working Group, which consists of members from HOLA, the Human Capital Recruitment Team, and OMWI, was established as a result of the HBA to collaborate on a sustainable and formal plan to improve and increase outreach to colleges and universities with the goal of</p>
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⁷ OCRE is working with the EDM team to develop a process for more efficient and accurate data transfer between USA Staffing and Treasury systems. Based on the challenges identified and Treasury's commitment to provide accurate and reliable data, Treasury, on behalf of the OCC as a second-level reporting component, made the decision to exclude applicant flow data from the FY 2022 MD-715 submission. OCRE is hopeful that efforts made in FY 2023 will provide Treasury the opportunity to submit accurate applicant flow data for the FY 2023 MD-715 report.

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FY 2022	<p>maximizing the pool of Hispanic applicants. In FY 2022, the working group continued to identify Hispanic recruiters to participate in outreach events and solicit greater participation among HOLA members to become trained recruiters. In addition, the working group continued to identify and expand the Hispanic accounting, finance, and business-related organizations and clubs at colleges and universities to increase the Hispanic applicant pool for entry-level examiner positions. The OCC, with the assistance of HOLA, sponsored 20 virtual sessions and six in-person sessions in FY 2022. The OCC also hosted four career webinars to amplify opportunities to entry-level Hispanic students. The virtual sessions included career fairs and information sessions that helped college students understand why they should pursue a career as a bank examiner. Nearly 120 students participated. These efforts also helped to increase the number of district financial interns from two in FY 2021 to 28 in FY 2022, of whom 14.3 percent were Hispanics, above the 2014-2018 OCLF of 8.5 percent. The working group also drafted a Hispanic Recruitment Plan that should be finalized by the end of the fiscal year (FY 2022).</p> <p>In FY 2022, a total of 28 employees were identified as receiving the requisite training to become qualified as training team leaders (TTL) and training team assistants (TTA) and served as TTLs and TTAs to 55 new assistant national bank examiner (ANBE) hires, of whom 7.1 percent (2) were Hispanic. The entry-level examiner recruitment program was also used to mentor and prepare examiners for the Uniform Commission Examination (UCE). Hispanics passed the UCE (3.8 percent) at rates below their average availability pool rate in the bank examiner workforce (11.8 percent).</p> <p>Hispanic ANBEs who were in their first two years of employment by the end of the fiscal year received awards and recognition (15.8 percent) at rates exceeding their average participation in the ANBE workforce (13.4 percent).</p>
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MD-715 – Part I
Agency EEO Plan to Eliminate Identified Barrier

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

If the agency did not conduct barrier analysis during the reporting period, please check the box.

Statement of Condition That Was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables	A4 and A7	Low representation of Hispanic workforce participation in GS-13 through senior executive service (SES) equivalent positions (NB-V through NB-IX).

EEO Group(s) Affected by Trigger

EEO Group	Yes
All Men	
All Women	
Hispanic or Latino Males	Yes
Hispanic or Latino Females	Yes
White Males	
White Females	
Black or African American Males	
Black or African American Females	
Asian Males	
Asian Females	
Native Hawaiian or Other Pacific Islander Males	
Native Hawaiian or Other Pacific Islander Females	
American Indian or Alaska Native Males	
American Indian or Alaska Native Females	

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EEO Group
Two or More Races Males
Two or More Races Females

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Reviewed Tables A4 and A7 to track the participation pattern across demographic profiles of Hispanic employees in GS-13 through SES equivalent positions to determine if there is growth in their participation rates.
Complaint Data (Trends)	Yes	Reviewed complaints trend data to determine if Hispanics raised common issues.
Grievance Data (Trends)	Yes	Reviewed grievance data to determine any trends in cases raised by Hispanic employees.
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	Reviewed grievance data on selections to determine any trends in cases raised by female and minority employees.
Climate Assessment Survey (e.g., FEVS)	Yes	Reviewed the questions and responses that support the diversity and inclusion index for Hispanics in the Federal Employee Viewpoint Survey (FEVS).
Exit Interview Data	Yes	Reviewed responses from Hispanics to determine common reasons for leaving the agency, and their work experiences.
Focus Groups	Yes	Reviewed Hispanic focus group data results on the work experiences, retention, and career development of Hispanic employees in the OCC.
Interviews	Yes	Reviewed interview data from various groups (e.g., Hispanic Organization for Leadership and Advancement (HOLA), recruiters, interviewers/panelists, staffing specialists, hiring officials) regarding their experiences and opinions concerning the low representation, career development, and retention of Hispanic employees in the OCC.
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	Yes	Reviewed Hispanics' rate of participation in career

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
		development programs compared with their relevant workforce participation rates.

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
Yes	Yes

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
<p>The low workforce participation rate of Hispanics in GS-13 through SES⁸ equivalent positions is influenced by slow career progression, limited promotion and advancement opportunities, and the need for a formalized agency-wide program for mentors, sponsors, or coaches.</p> <p>Hispanic examiners and non-examiners identified limited opportunities for career advancement and progression as the biggest challenge in working for the OCC. The main reason examiners gave for leaving was for higher compensation; for non-examiners it was for more meaningful work or having more impact.</p>

⁸ GS-13 through SES/SLP grades are equivalent to NB-V through NB-IX grades.

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Objective(s) and Dates for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Increase participation of Hispanics in Manager, Deputy Comptroller (DC), and Executive Committee (EC) Levels	06/30/2020	09/30/2029	Yes		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Senior Deputy Comptrollers	All Executive Committee Members	Yes
Executive Director, Office of Minority and Women Inclusion (OMWI)	Joyce Cofield	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
06/30/20	Integrate diversity into succession planning and maximize every opportunity to promote or hire Hispanics to Manager, Deputy Comptroller (DC), and Executive Committee (EC) levels.		09/30/22
06/30/20	Establish and maintain the HOLA Assistant National Bank Examiner (ANBE) Mentoring Cadre.		09/30/22
06/30/20	Monitor trends in new and existing opportunities and temporary promotions.		09/30/22
09/30/22	Formalize the OCC's Mentoring Program.		09/30/22

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Report of Accomplishments

Fiscal Year	Accomplishments
FY 2022	<p>The Hispanic Barrier Analysis (HBA) Project was completed in FY 2020 and identified low participation of Hispanics in supervisory and SES/senior-level positions (SLP⁹).</p> <p>In FY 2022, the percentage of Hispanics in SLP was 6.1 percent and the percentage in supervisor positions was 7.0 percent, below their workforce participation rate of 8.1 percent. The percentage of Hispanics in SLPs and supervisor positions decreased by 0.4 and 0.1 percentage points from FY 2021, respectively. Hispanics in GS-15¹⁰ equivalent positions were also below their workforce participation rates (5.9 percent vs. 8.1 percent).</p> <p>Four (12.9 percent) Hispanic females and two (6.5 percent) Hispanic males in GS-15 equivalent positions were promoted in FY 2022. One Hispanic male (12.5 percent) was hired at the GS-15 equivalent level, however, no Hispanics were hired or promoted into SLP.</p> <p>One (25.0 percent) Hispanic female was temporarily promoted to a supervisory SES equivalent position from a GS-15 equivalent position, and one (1.9 percent) Hispanic female was temporarily promoted to a supervisory GS-15 equivalent position from a GS-14¹¹ equivalent position.</p> <p>FY 2022 was a transitional year with applicant tracking data blended from Monster Analytics and USA Staffing data collection systems. This resulted in anomalies in the data which compromised the accuracy and integrity of the data results. Accordingly, no applicant flow data analysis will be performed on vacancies that closed in FY 2022, by ethnicity and grade levels, GS-13 through SES equivalent grades (NB-V through NB-IX).¹²</p> <p>In FY 2022, HOLA maintained the ANBE Mentorship Cadre for first-year entry-level Hispanic new examiner hires. The goal of the ANBE Mentorship Cadre is to welcome and help new hires navigate the OCC, enhance their early career experiences, and enhance the agency's ability to retain new hires and expand its future pipeline. Through this Cadre, HOLA sought to help address the retention issues identified in the HBA.</p> <p>HOLA also partnered with the OCC's other employee network groups and its Leadership and Development department to provide mentors to all new ANBE hires. The cadre mentors are an additional resource along with their</p>

⁹ SES/SLP grades are equivalent to NB-VIII and NB-IX grades.

¹⁰ GS-15 grade is equivalent to NB-VII grade.

¹¹ GS-14 grade is equivalent to NB-VI grade.

¹² OCRE is working with the EDM team to develop a process for more efficient and accurate data transfer between USA Staffing and Treasury systems. Based on the challenges identified and Treasury's commitment to provide accurate and reliable data, Treasury, on behalf of the OCC as a second-level reporting component, made the decision to exclude applicant flow data from the FY 2022 MD-715 submission. OCRE is hopeful that efforts made in FY 2023 will provide Treasury the opportunity to submit accurate applicant flow data for the FY 2023 MD-715 report.

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FY 2022	<p>host assistant deputy comptroller and training team leaders. Of the total 103 mentors in the cadre, 65 mentors were assigned to new ANBE hires, of whom 33 were from HOLA.</p> <p>The One-on-One Mentoring Program pilot launched in July 2022. The system matched 37 mentees with mentors. This exceeded the initial plan of 25 mentoring pairs due to high interest in the program. Program administrators developed matching questions for mentors and mentees then ran the matching function on the pilot population. In addition to using the Mentoring module, program administrators developed a Mentoring Toolkit as a one-stop-shop resource for mentors and mentees. The Toolkit is available in the Integrated Talent Management Learning module and includes a meeting tracker, meeting discussion guides, the program orientation video, mentoring agreement, and mentoring resources. Of the 74 employees who participated in the Mentoring Program (mentees and mentors), 9.5 percent (7) were Hispanic.</p> <p>Flash mentoring was also made available to employees through ENG's and the Leadership Institute. Flash mentoring is a one-time meeting or discussion that can enable a small group of individuals to learn and seek guidance from a more experienced person, who can pass on relevant knowledge and experience. Over 75 employees participated in one flash mentoring event.</p> <p>HOLA is working with the OCC's Enterprise Workforce Planning Director and the HBA Program Manager on building an interview panel pool with knowledge of the core duties of the job and composed of diverse individuals from across the agency. This pool would help hiring managers ensure diversity on interview panels.</p>
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Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

If the agency did not conduct barrier analysis during the reporting period, please check the box.

Statement of Condition That Was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables	A4 and A7	Promotion rates of Hispanics in GS-13 through senior executive service (SES) equivalent positions (NB-V through NB-IX) in the OCC are lower than expected when compared with their relevant participation in the workforce.

EEO Group(s) Affected by Trigger

EEO Group	Yes
All Men	
All Women	
Hispanic or Latino Males	Yes
Hispanic or Latino Females	Yes
White Males	
White Females	
Black or African American Males	
Black or African American Females	
Asian Males	
Asian Females	
Native Hawaiian or Other Pacific Islander Males	
Native Hawaiian or Other Pacific Islander Females	
American Indian or Alaska Native Males	
American Indian or Alaska Native Females	

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EEO Group
Two or More Races Males
Two or More Races Females

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Reviewed Tables A4 and A7 to track the participation pattern across demographic profiles of Hispanic employees in GS-13 through SES equivalent positions to determine if there is growth in their participation rates.
Complaint Data (Trends)	Yes	Reviewed complaints trend data to determine if Hispanics raised common issues.
Grievance Data (Trends)	Yes	Reviewed grievance data to determine any trends in cases raised by Hispanic employees.
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	Reviewed grievance data on selections to determine any trends in cases raised by female and minority employees.
Climate Assessment Survey (e.g., FEVS)	Yes	Reviewed the questions and responses that support the diversity and inclusion index for Hispanics in the Federal Employee Viewpoint Survey (FEVS).
Exit Interview Data	Yes	Reviewed responses from Hispanics to determine common reasons for leaving the agency, and their work experiences.
Focus Groups	Yes	Reviewed Hispanic focus group data results on their work experiences, retention, and career development of Hispanic employment in the OCC.
Interviews	Yes	Reviewed interview data from various groups (e.g., Hispanic Organization for Leadership and Advancement (HOLA), recruiters, interviewers/panelists, staffing specialists, hiring officials) regarding their experiences and opinions concerning the low representation, career development, and retention of Hispanic employees in the OCC.
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	Yes	Reviewed Hispanics' rate of participation in career

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
		development programs compared with their relevant workforce participation rates.

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
Yes	Yes

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
<p>The low promotion rate of Hispanics in GS-13 through SES equivalent positions is influenced by slow career progress, limited promotions and advancement opportunities, and lack of a formalized agency-wide program for providing mentors, sponsors, or coaches.</p> <p>Our analysis indicates that it takes Hispanic examiners 1.4 years longer on average to achieve promotions from GS-13 to GS-14 equivalent positions (NB-V and NB-VI). The average promotion rate across the agency from GS-14 to GS-15 equivalent positions (NB-VI and NB-VII) for Hispanic examiners is mixed (i.e., entry-level, experienced, district, and Large Bank Supervision examiners) and for non-examiners is low at best and in many cases absent.</p>

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Objective(s) and Dates for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Improve career progression for Hispanics in GS-13 through SES equivalent positions.	06/30/2020	09/30/2029	Yes		
Foster a more inclusive environment for all Hispanics	06/30/2020	09/30/2029	Yes		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Senior Deputy Comptrollers	All Executive Committee Members	Yes
Executive Director, Office of Minority and Women Inclusion (OMWI)	Joyce Cofield	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/18	Invite OCC speakers to HOLA annual and quarterly calls to discuss OCC career opportunities.		09/30/22
09/30/18	Continue to direct OCC job opportunities and postings to the HOLA membership.		09/30/22
09/30/18	Continue to promote Hispanic participation in management, leadership, and career development programs.		09/30/22
09/30/18	HOLA members will participate in OCC outreach at the annual conferences of Latin American organizations, including League of United Latin American Citizens (LULAC) and UnidosUS, formerly La Raza.		09/30/22
06/30/20	Increase pools of qualified Hispanic candidates to successfully compete for leadership positions and developmental opportunities.		09/30/22

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Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
06/30/20	Utilize the individual development plan (IDP) process to ensure managers/supervisors have career development discussions with Hispanic employees.		09/30/22
06/30/20	Use award system and merit bonuses to incentivize proactive support of diversity and inclusion.		09/30/22
06/30/20	Provide more soft skills training around inclusive work culture and unconscious bias training for all employees.		09/30/22
06/30/20	Continue to visibly support a culture of engagement and inclusion at all levels of the OCC.		09/30/22
06/30/20	Implement action items in the Hispanic Barrier Analysis (HBA) Action Plan related to the focus areas on fostering a more inclusive environment.		09/30/22

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2022	<p>The slow career progression for Hispanics in GS-13 through SES¹³ equivalent positions and the need to foster a more inclusive environment for all Hispanics were identified in the HBA that was completed in FY 2020.</p> <p>In FY 2022, Hispanics were promoted to GS-13 equivalent positions at 4.1 percent, below their workforce participation rate (8.1 percent) and below their FY 2021 promotion rate of 10.1 percent. This was driven by the low promotion rate in examiner positions, as no Hispanic non-examiners received promotions in FY 2022.</p> <p>The OCC has promoted the full engagement of Hispanic participation in management, leadership, and career development programs. Members of the OCC's staff participated in several formal and informal career development programs and training courses that provided learning and continuous growth opportunities in FY 2022, in which Hispanics were 9.0 percent of participants.</p> <p>Hispanic employees (7.3 percent) participated in agency-sponsored leadership training courses designed for managers, supervisors, and employees. Hispanic employees (7.4 percent) also participated in the agency's executive coaching program, designed to address both immediate tactical issues and strategic long-term issues or opportunities, and to coach</p>

¹³ GS-13 through SES grades are equivalent to NB-V through NB-IX grades.

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FY 2022	<p>leaders to align vision, actions, and performance.</p> <p>The OCC offers a Leadership Practice Inventory 360 Degree Assessment to solicit feedback for aspiring executives to develop and improve communication and working relationships across the OCC. This tool is offered as part of two Leadership courses—“Leader Within: Awakening Authentic Leadership” and “Leading and Engaging”—in which Hispanics participated (5.2 percent).</p> <p>Hispanic employees (7.0 percent) in GS-13 and above equivalent positions participated in courses through the Treasury Executive Institute, which provides programs on a variety of leadership competencies (communication, conflict, diversity, etc.) that can help support continuous learning and development.</p> <p>Also, Hispanic employees (11.5 percent) continued to receive robust training and development in the OCC’s Leadership Exploration and Development (LEAD) Cohort II Program (those selected in FY 2020). The program is designed to develop leadership competencies at the team leader and/or manager level and foster a broader, enterprise perspective. No Hispanic employees were selected for the LEAD Cohort III Program in FY 2022.</p> <p>The EXCEL I Program, sponsored by the Large Bank Supervision (LBS) department, provides NB-V bank examiners with the opportunity to develop expertise in one of eight specialty areas. Upon successful completion of the program, candidates remain in LBS to work within their specialty areas as members of a large bank resident team. In FY 2022, one Hispanic bank examiner (9.1 percent) was selected.</p> <p>In FY 2022, HOLA led the partnership with other ENG’s to facilitate business unit information sessions on opportunities for career advancement, such as the EXCEL Program information-sharing session and the Office of Enterprise Governance and the Ombudsman’s “Opportunities and Overview” sessions.</p> <p>HOLA collaborated with other ENG’s to disseminate information on job opportunities to its members through direct emails. HOLA also increased its efforts to promote career advancement by using its expanded liaison group’s network this fiscal year to raise awareness of opportunities.</p> <p>The agency’s Midsize and Community Bank Supervision (MCBS) department sponsors developmental opportunities as Training Team Leaders (TTL) and Training Team Assistants (TTA) for new entry-level assistant national bank examiner (ANBE) hires. The assignment typically lasts six to eight months, and selected employees take the “Leading Training Teams” training course in advance of the assignment. In FY 2022, a total of 28 employees identified as having received training and served as TTLs and TTAs to 55 new ANBE hires in FY 2022, 7.1 percent of the TTLs and TTAs were Hispanic.</p> <p>Eleven (13.9 percent) Hispanics applied and five (13.9 percent) were selected for various uniform commission examination (UCE)-related assignments, such as UCE Mock Evaluators and Training Session, UCE</p>
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FY 2022	<p>Mock Coordinator, UCE Bank Examination Case Development Team Chair, and UCE Credit Case Development Team Chair. These roles were for examiners in GS-13 and above equivalent grade levels.</p> <p>In FY 2022, the Honors Attorney Program hired three candidates for the third cohort program (the class of 2022). The program is designed to provide cross-training and developmental assignments to equip incoming law clerks and attorneys with legal skills and experiences across multiple legal practice areas. No Hispanics were hired.</p> <p>One (12.5 percent) Hispanic applied and was selected (33.3 percent) for a Chief Counsel Office’s leadership position at a GS-13 and above equivalent level.</p> <p>Additionally, one Hispanic (10.0 percent) applied and was selected (33.3 percent) for a Human Resource Specialist position at a GS-13 and above equivalent level.</p> <p>Several HOLA members were selected for detail opportunities and supported various OCC initiatives by volunteering in leadership roles, including remaining a part of the LEAD Cohort II Program (11.5 percent).</p> <p>HOLA also continued to offer two programs to help its members with their career development—Speak to Lead and Career Coaching. HOLA’s Speak to Lead Program provides members with real-time feedback on mock exit interviews, board meetings, and presentations. The independent panel joins the participant(s) via video conferencing. In FY 2022, there were 10 speech coaches and 10 participants. The Career Coaching Program is a specialized opportunity to assist members in the development and potential promotion of their careers. Members are paired with internal coaches and provided advice on available career paths, career progression, résumé writing, interviews, and training opportunities. In FY 2022, there were 42 coaches and mentees paired.</p> <p>HOLA also hosted teleconferences under its Speaker Series for its members on the OCC’s LEAD Program and upcoming opportunities, mentorship and sponsorship, and career coaching. Over 235 employees participated in the three teleconferences combined.</p> <p>The HBA project identified the benefits of incorporating more soft skills training to supervisors and managers and the value of supervisors having career development discussions with their Hispanic employees. In FY 2022, Hispanics participated in various unconscious bias (7.1 percent) training courses. The OCC’s Leadership Institute offered an emotional intelligence course under its Continuous Leadership Experience (CLX) Program titled “Leading with Emotional Intelligence,” in which 105 employees participated, of whom 6.7 percent were Hispanic. Generally, the full workforce of Hispanics (8.1 percent of the total OCC workforce) submitted individual development plans (IDP) and participated in career development discussions with their managers. Of those, 9.5 percent indicated on their IDPs that they aspired to the next leadership level. In addition, 6.7 percent of participants in the “Career Development Conversations” training course were Hispanic.</p>
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FY 2022	<p>The OCC also continued to support a culture of engagement and inclusion at all levels of the agency and foster a more inclusive environment for all Hispanics. For the past three years, FEVS Employee Engagement Index (EEI) scores for Hispanics have generally remained aligned with the overall agency scores. For the 2021 FEVS, the EEI was 79.2 percent for Hispanics and 77.6 percent for the OCC. The Global Satisfaction Index for Hispanics was 69.3 percent, and 71.1 percent for the OCC. The OCC has not received demographic data for the 2022 FEVS administered in July 2022. We anticipate receiving the demographic data by the end of the year.</p> <p>HOLA expanded the diversity of opportunities for individuals to interact in meaningful ways and build team rapport across the agency. They launched a quarterly brown bag series in FY 2022 titled “Overcoming Cultural Stereotypes” to help individuals connect across the agency and support a culture of engagement and inclusion at all levels. Also, HOLA launched monthly beginner and intermediate Spanish classes in FY 2022 to provide more opportunities for individuals to interact across the agency and build rapport.</p> <p>The HBA Program Manager, HOLA, and OMWI continued to partner on the HBA Project and provided a progress report to the Executive Committee and the Acting Comptroller to keep raising awareness of the need to increase Hispanic participation at the OCC. The HBA findings and action items serve as the framework for HOLA initiatives, which they continue to support given their important contribution in helping advance Hispanics’ full participation at the OCC.</p> <p>To raise awareness of HOLA's mission, key organizational changes, and opportunities with Hispanic recruitment and retention, HOLA gave a presentation at the agency’s all-employee Town Hall meeting, and provided presentations to one district senior management group, two management teams, and one district administrative group in FY 2022. In addition, HOLA and the HBA Program Manager gave a presentation to an EC member. HOLA plans to continue presentations in FY 2023, including “Let’s Talk” sessions with the Office of Management.</p> <p>Hispanics in GS-13 through GS-15 equivalent positions received awards and recognition (7.2 percent) at rates less than their participation in the workforce (8.1 percent).</p>
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MD-715 – Part I
Agency EEO Plan to Eliminate Identified Barrier

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

If the agency did not conduct barrier analysis during the reporting period, please check the box.

Statement of Condition That Was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables Workforce Data Tables Five-Year Trend Analysis	A6, A8, and A14S2	The representation of female bank examiners in the OCC is lower than expected when compared with their 2000 occupational civilian labor force (OCLF) rate. In FY 2022, female bank examiners' participation rate in the workforce was 37.7 percent, below their 2014-2018 OCLF rate (45.8 percent).

EEO Group(s) Affected by Trigger

EEO Group	Yes
All Men	
All Women	Yes
Hispanic or Latino Males	
Hispanic or Latino Females	
White Males	
White Females	
Black or African American Males	
Black or African American Females	
Asian Males	
Asian Females	
Native Hawaiian or Other Pacific Islander Males	
Native Hawaiian or Other Pacific Islander Females	
American Indian or Alaska Native Males	

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EEO Group
American Indian or Alaska Native Females
Two or More Races Males
Two or More Races Females

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Reviewed Tables A6, A8, and A14S2 to track the participation pattern across demographic profiles of female bank examiners to determine if there is growth in their participation rates.
Complaint Data (Trends)	Yes	Reviewed complaints trend data to determine if cases raised by female bank supervision employees raised common issues.
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	Reviewed the questions that support the diversity and inclusion index for females in the Federal Employee Viewpoint Survey (FEVS).
Exit Interview Data	Yes	Reviewed responses from female bank examiners to determine common reasons for leaving the agency, and their work experiences.
Focus Groups	Yes	Collected interview data from The Women's Network (TWN) members on their work experiences and opinions concerning the low representation of female bank examiner employment in the OCC.
Interviews	Yes	Reviewed interview data from various groups (e.g., TWN, recruiters, interviewers/panelists, staffing specialists, hiring officials) regarding their experiences and opinions concerning the low representation of female bank examiner employment in the OCC.
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Reviewed federal and private sector reports to gain additional information on best practices and solutions for addressing low participation of female bank examiners in the OCC's workforce.

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Other (Please Describe)	Yes	<p>Post recruitment, analyze the number of female applicants for entry-level bank examiner positions, and their movement through the recruitment process.</p> <p>Compared the entry-level test scores for females with other groups' test scores.</p> <p>Compared the OCC's workforce data on female bank examiners with data from the National Center for Education Statistics on female students with conferred B.A. and M.A. business degrees.</p> <p>Conducted a 10-year retention analysis of genders.</p> <p>Prepared a five-year trend analysis of the workforce data tables.</p>

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
Yes	Yes

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
<p>Our analysis indicates that the number of entry-level female bank examiners was limited in the applicant pool and that they were hired at rates below the OCLF rate. The average separation rate and the average hiring rate were about the same.</p> <p>Further analysis indicated that feedback from prospective applicants revealed that private sector jobs are more attractive due to fewer travel requirements. This perspective is supported by exit survey results from departing OCC female examiners. These factors greatly contribute to the existence of this trigger, and to the speed with which the OCC can eliminate this barrier.</p>

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Objective(s) and Dates for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Develop a recruitment and retention strategy for female bank examiners that builds on the success of our outreach and recruitment efforts.	10/01/2004	09/30/2029	Yes	10/01/2017	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Senior Deputy Comptroller for Large Bank Supervision (LBS)	Greg Coleman	Yes
Senior Deputy Comptroller for Midsize and Community Bank Supervision (MCBS)	Beverly Cole	Yes
Senior Deputy Comptroller for Bank Supervision Policy	Grovetta Gardineer	Yes
Senior Deputy Comptroller for Supervision Risk and Analysis	Jay Gallagher	Yes
Senior Deputy Comptroller and Chief Counsel	Benjamin McDonough	Yes
Executive Director, Office of Minority and Women Inclusion (OMWI)	Joyce Cofield	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/18	Enhance current recruitment sources to ensure applicant pools of qualified female candidates.		09/30/22
09/30/18	Expand the Entry-Level Bank Examiner Recruitment Program efforts and recruitment strategy and develop relationships with additional women's colleges.		09/30/22
09/30/18	Engage the expertise of lead recruitment		09/30/22

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Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
	specialists to target and recruit diverse female bank examiner candidates.		
09/30/18	Recruit students through the District Financial Internship Program.		09/30/22
09/30/18	Secured a contract with Personnel Decisions Research Institutes (PDRI) to administer the assistant bank examiner assessments. Began utilizing PDRI services in spring 2022.		06/30/22
09/30/18	Continue to promote diversity in recruiters and interview panels.		09/30/22
09/30/18	Participate in the Accounting & Finance Women's Alliance (AFWA) Conference and the Community Reinvestment and Fair Lending Conference.	09/30/23	
09/30/18	Participate in the National Association of Black Accountants national and regional conferences, as available. Also, attend the National Black MBA Association Leader Conference.		09/30/22
09/30/18	Recruit experienced specialty bank examiners from the following conferences, which have high female participation rates: Association of Certified Anti-Money Laundering Specialists (ACAMS), American Bankers Association/Bank Secrecy Act (ABA/BSA), Consumer Bankers Association (CBA), and Fiduciary and Investment Risk Management Association (FIRMA).	09/30/23	
09/30/18	Further develop strong relationships with college campus groups such as Beta Alpha Psi (BAP).		09/30/22
09/30/18	Analyze and use research data from National Association of Colleges and Employers (NACE) on accounting and finance graduating classes, their demographics, and ways to select schools to build a qualified and diverse applicant pool of females.		09/30/22
09/30/18	Support more internal mentoring circles to engage with female employees on how to balance the responsibilities of work and family.		09/30/22
09/30/18	Support TWN in providing OCC employees with access to networking and mentoring opportunities that will enhance their job satisfaction and prepare them for possible advancement.		09/30/22

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Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/18	Promote retention of women by establishing networking venues to which women can turn for support, encouragement, and mentorship when they encounter workplace challenges.		09/30/22
09/30/18	Continue regular reviews with senior management and employee network groups (ENG) to highlight areas of concern and opportunities for improvement.		09/30/22
08/30/22	A national recruitment cadre was established by collaborating with the MCBS front office to create a unified and inclusive recruiter cadre that represents our diverse examiner workforce to work on expanding that diversity through recruitment efforts.		09/30/22

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2022	<p>In FY 2022, the workforce participation rate of female bank examiners slightly decreased to 37.7 from 37.8 percent in FY 2021, above the 36.1 percent in FY 2005, but below the 2014-2018 OCLF rate of 45.8 percent. The separation rate for female bank examiners (36.3 percent) was below their workforce participation rate of 37.7 percent. The hiring rate (31.4 percent) of female bank examiners was below their OCLF rate (45.8 percent) but above their hiring rate in FY 2021 (28.9 percent). Hiring rates for female bank examiners in key bank supervision groups were as follows: for MCBS, 22.2 percent entry-level (pre-commissioned) and 50.0 percent experienced; for LBS, 39.3 percent, experienced level; and for Bank Supervision Policy, 50.0 percent.</p> <p>In FY 2022, TWN and the Recruitment Team established a working group to identify and conduct research on colleges and universities whose student population consisted of a substantial percentage of women and/or are considered women's colleges. Four female recruiters were identified to participate in outreach events and solicit greater participation among TWN members to become trained recruiters. TWN members served as recruiters/screeners during the entry-level bank examiner recruitment campaigns, targeted colleges and universities, and represented the agency at various career forums and job fairs.</p> <p>The working group identified female student organizations that focused on majors that typically aligned with the agency's hiring focus (business, finance, accounting, technology, and law). They used this information to target schools for recruitment activities. TWN participated in outreach at four events/activities in September 2022, including a Women's Colleges &</p>

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FY 2022	<p>Universities Diversity Virtual Career Expo. In addition, TWN and Hispanic Organization for Leadership and Advancement (HOLA) hosted two assistant national bank examiner (ANBE) career webcasts at targeted colleges and universities titled “A Career Worth Examining.” A special TWN flyer was created to attract the interest of women.</p> <p>In addition, the OCC conducted outreach recruitment at women’s associations and organizations, including the AFWA Women Who Count Conference.</p> <p>The OCC hired 55 entry-level bank examiners in FY 2022, of whom 21.8 percent (12) were females, below the 2014-2018 OCLF of 45.8 percent and below the FY 2021 hiring rate (29.2 percent).</p> <p>FY 2022 was a transitional year with applicant tracking data blended from Monster Analytics and USA Staffing data collection systems. This resulted in anomalies in the data which compromised the accuracy and integrity of the data results. Accordingly, no applicant flow data analysis will be performed of the entry-level bank recruitment campaign in 2022 or on the examiner vacancies that closed in FY 2022.¹⁴</p> <p>Female bank examiners were promoted at a lower rate (35.4 percent) than their participation in the workforce (37.7 percent). During FY 2022, three Uniform Commission Examination (UCE) testing sessions were held. Of the 79 bank examiners who successfully passed the UCE, 34.2 percent (27) were female, below their average availability pool rate (36.5 percent).</p> <p>The OCC continued to hire and increased the number of financial interns in its district offices. In FY 2022, the districts hired 28 financial interns, of whom 42.9 percent (12) were females, below the 2014-2018 OCLF rate of 45.8 percent.</p> <p>Additionally, TWN continued its Resource Groups mentoring program with two resource groups — “Managing Your Career (MYC)” and “Work Life Navigation,” in which over 360 employees participated. The Resource Groups also hosted over 17 peer mentoring sessions (Midday Refresh calls) on topics including career management and work-life navigation, and sponsored one event, “Where Do You Go to Learn,” in which over 150 participants attended as part of MYC. TWN, in partnership with the OCC’s other ENG’s and the Leadership Institute, also offered over 75 employees flash mentoring in FY 2022. This one-time meeting or discussion was held with a small group of individuals to facilitate learning and seeking guidance from more experienced employees with relevant knowledge and experiences. In addition, TWN promoted its highly successful mentoring circles as a continued vehicle to support mentoring for women, enabling opportunities for collaboration, networking, and goal achievement. Four mentoring circles were offered in FY 2022 to help employees successfully address career issues. Mentoring circle topics included “Career Exploration,” “UCE Preparation,” and “Leadership.” From all of TWN’s</p>
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¹⁴ OCRE is working with the EDM team to develop a process for more efficient and accurate data transfer between USA Staffing and Treasury systems. Based on the challenges identified and Treasury’s commitment to provide accurate and reliable data, Treasury, on behalf of the OCC as a second-level reporting component, made the decision to exclude applicant flow data from the FY 2022 MD-715 submission. OCRE is hopeful that efforts made in FY 2023 will provide Treasury the opportunity to submit accurate applicant flow data for the FY 2023 MD-715 report.

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FY 2022	<p>mentoring efforts, a total of 54 mentors, 234 mentees, and 13 mentoring committee members participated, an 84.7 percent net increase above the FY 2021 <u>mentoring circle participation</u> total (46). Of the FY 2022 participants, 82.1 percent (247) were female, 17.6 percent (53) were Black, 11.6 percent (35) were Hispanic, 10.3 percent (31) were Asian, and 1.0 percent (3) were from Small Ethnicity Race Indicator (ERI) groups. The participation rates for all groups, except females and Small ERI groups, were greater than the rates in FY 2021.</p> <p>During the Women's History Month observance, TWN's guest speaker spoke on "The Great Resignation," its effect on women, and the difficult choices women face between work, career, family, and life itself. Related to the observance event, TWN, along with three large bank teams, facilitated discussion groups on diversity, equity, and inclusion. TWN also published three newsletters and sent monthly TWN president's messages to members and promoted TWN events in OCC-wide internal communications.</p>
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MD-715 – Part I

Agency EEO Plan to Eliminate Identified Barrier

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

If the agency did not conduct barrier analysis during the reporting period, please check the box.

Statement of Condition That Was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables SLP Trend Analysis	A4 and A8S-3	<p>The participation rates of female and minority employees in the OCC are below their workforce participation rates at the GS-13 equivalent and above grade levels¹⁵.</p> <p>In FY 2022, females overall and females in all EEO groups in senior-level positions (SLP)¹⁶ were participating below their workforce participation rates or absent: females (38.8 percent vs. 43.8 percent) and minorities (32.7 percent vs. 36.9 percent).</p>

EEO Group(s) Affected by Trigger

EEO Group	
All Men	
All Women	
Hispanic or Latino Males	Yes
Hispanic or Latino Females	Yes
White Males	
White Females	Yes
Black or African American Males	Yes
Black or African American Females	Yes
Asian Males	Yes
Asian Females	Yes

¹⁵ GS-13 through SLP/SES grades are equivalent to NB-V to NB-IX grades.

¹⁶ SLP/SES grades are equivalent to NB-VIII and NB-IX grades.

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EEO Group	
Native Hawaiian or Other Pacific Islander Males	Yes
Native Hawaiian or Other Pacific Islander Females	Yes
American Indian or Alaska Native Males	Yes
American Indian or Alaska Native Females	Yes
Two or More Races Males	Yes
Two or More Races Females	Yes

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Reviewed Tables A4 and A8S-3 to track the participation pattern across demographic profiles of female and minority employees to determine if there is growth in their participation rates.
Complaint Data (Trends)	Yes	Reviewed complaints data on selections to determine if there are any trends in cases raised by female and minority employees.
Grievance Data (Trends)	Yes	Reviewed grievance data on selections to determine any trends in cases raised by female and minority employees.
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	Reviewed and considered the findings and recommendations of the external reviews, evaluations, and audits performed by the Office of Inspector General (OIG), Equal Employment Opportunity Commission (EEOC), Office of Personnel Management (OPM), and Treasury Department on the OCC's workforce, and specifically its SLP and feeder groups.
Climate Assessment Survey (e.g., FEVS)	Yes	Reviewed the questions and responses that support the diversity and inclusion index for females and minority employees in the Federal Employee Viewpoint Survey (FEVS).
Exit Interview Data	Yes	Reviewed responses from females and minority employees to determine common reasons for leaving the agency, and their work experiences.
Focus Groups	Yes	Formed a working group that conducted a root cause

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
		analysis and held brainstorming sessions to identify potential barriers analysis and solutions; researched best practices with industry leaders; developed recommendations for solution with an implementation framework.
Interviews	Yes	Reviewed interview data from various groups (e.g., The Women’s Network (TWN) and other employee network groups (ENG), recruiters, interviewers/panelists, staffing specialists, hiring officials) regarding their experiences and opinions concerning the low representation of female and minority employment in the OCC.
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Reviewed reports from several federal, private sector, and special interest groups (e.g., EEOC, GAO, Catalyst, Corporate Executive Board, and the McKinsey Group) to gain additional information on best practices and solutions for addressing low participation of female bank examiners in the OCC’s workforce.
Other (Please Describe)	Yes	Conducted a career aspirations assessment survey in 2014 of employees in pay bands NB-VI and NB-VII. Analyzed other variables that could provide insight into the differences between males and females overall, for example, age, base salary, relocation, and travel.

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
Yes	Yes

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
<p>Through the work of the interdisciplinary working group, the OCC identified three main causes for the disparity in representation of women and minorities in SLP and their pipelines: leadership skill barriers, cultural barriers, and career aspirations. The leadership skill barrier includes issues of office morale, encouragement, and the role of leaders. The cultural barrier involves a clear recognition of the value of diversity in the organization. The career aspirations barrier includes travel requirements, job stress, geographic relocations and family obligations, and work/life balance.</p>

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Objective(s) and Dates for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Increase the participation of females and minorities in supervisor positions and SLPs by eliminating the barriers in leadership skills, cultural, and career aspirations.	10/01/2009	09/30/2029	Yes	10/01/2017	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Senior Deputy Comptrollers	All Executive Committee Members	Yes
Executive Director, Office of Minority and Women Inclusion (OMWI)	Joyce Cofield	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/18	Continue to evolve agency-wide leadership development offerings for employees at all levels. Continual learning will be expanded through formal/informal courses, coaching, mentoring and online resources available through Treasury's Integrated Talent Management (ITM) platform.		09/30/22
08/01/22	The OCC is also undertaking a pilot initiative in FY 2023 focused on executive development, including a robust set of internal and external resources aligned to executive competencies, as well as opportunities for continual learning, networking and engagement through panel discussions and executive education offerings.		09/30/22
10/01/22	Exploring best practices in developing diverse interview panels.		

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Report of Accomplishments

Fiscal Year	Accomplishments
FY 2022	<p>The participation of females and minorities in supervisor roles and SLP remained a priority for the OCC in FY 2022. Females participated at 43.8 percent in the workforce and held 41.5 percent of supervisor positions and 38.8 percent of SLP; both rates remained below their workforce participation rate. Female participation rates increased in SLP by 1.8 percentage points between FY 2021 and FY 2022, while supervisor positions decreased by 0.6 percentage points.</p> <p>Minorities also participated in supervisor roles and SLP below their overall workforce participation rates; however, minorities increased their participation in supervisor roles and SLP in FY 2022. Minorities participated at 36.9 percent in the workforce and held 31.6 percent of supervisor positions and 32.7 percent of SLP. Minority participation rates increased in SLP by 2.3 percentage points and supervisor positions increased by 0.9 percentage points. In supervisor roles, participation rates of all minority groups decreased, except Blacks in FY 2022. Two Black males were added in SLP.</p> <p>In addition, females (70.0 percent) and minorities (20.0 percent) in SLPs participated in the Executive Coaching Program, which is designed to address both immediate tactical issues and strategic long-term issues or opportunities, and to coach leaders to align vision, actions, and performance.</p> <p>Also, females (51.2 percent) and minorities (27.2 percent) in the SLP feeder grade (GS-15 equivalent) participated in several formal career development programs and training courses that provided learning and continuous growth opportunities in FY 2022. Participation rates increased from FY 2021 for females by 10.8 percentage points and for minorities by 2.9 percentage points.</p>

MD-715 – Part J

Special Program 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 plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

Section I: Efforts to Reach Regulatory Goals

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

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) | Yes X | No 0 |
| b. Cluster GS-11 to SES (PWD) | Yes X | No 0 |

New B4-1 in Data Insight (DI):

The participation rates for PWD in grade clusters GS-1 to GS-10 was 10.50 percent and GS-11 to SES¹⁷ was 10.33 percent in FY 2022, below the 12.0 percent goal.

Note: GS-11 to SES grade cluster data were corrected based on an error in the data tables. GS-14 shows the wrong count and percentage.

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) | Yes X | No 0 |
| b. Cluster GS-11 to SES (PWTD) | Yes X | No 0 |

New B4-1 in DI:

The participation rates of PWTD in the grade clusters, GS-1 to GS-10 was 1.43 percent and GS-11 to SES was 1.89 percent in FY 2022, below the goal of 2.0 percent.

Note: GS-11 to SES grade cluster data were corrected based on an error in the data tables. GS-

¹⁷ SES equivalent positions in the OCC are SLPs, NB-VIII, and NB-IX.

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14 shows the wrong count and percentage.

2. 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.

PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

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.

Yes X

No 0

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	
Processing applications from PWD and PWTB	30	1	0	Edner Escarne, Director for Talent Acquisition, Talent Acquisition, Office of Human Capital, Edner.Escarne@occ.treas.gov
Answering questions from the public about hiring authorities that take disability into account	30	1	0	Edner Escarne, Director for Talent Acquisition, Talent Acquisition, Office of Human Capital, Edner.Escarne@occ.treas.gov

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Processing reasonable accommodation requests from applicants and employees	1	0	0	Kelly Battista National Accommodation Coordinator, Office of Minority and Women Inclusion, Kelly.Battista@occ.treas.gov
Section 508 Compliance	143	0	0	Susan O'Brien, IT Accessibility Program Manager, Susan.Obrien@occ.treas.gov <i>Major Groups w/508 Compliance Work:</i> Randy Berner, Director, Educational Program Development, Randy.Berner@occ.treas.gov Jeff Brown, Acting Director, Training Operations, Jeffrey.Brown@occ.treas.gov Stephanie Lombardo, Director, Leadership Institute, Stephanie.Lombardo@occ.treas.gov David Small, Editorial and Design Services Manager, David.Small@occ.treas.gov Deirdre Eischens Director, Acquisition Management, Deirdre.Eischens@occ.treas.gov Nikkie Adams, Web and Electronic Publishing, Quality Assurance Specialist, Nikkie.Adams@occ.treas.gov
Architectural Barriers Act Compliance	5	0	0	Sheila N-Rad, Director for Workplace Services, Workplace Services, Administrative Operations, Sheila.Nematollahi-rad@occ.treas.gov
Special Emphasis Program for PWD and PWTD	4	0	0	Joyce Cofield, Executive Director, Office of Minority and Women Inclusion, Office of Minority and Women Inclusion, Joyce.Cofield@occ.treas.gov

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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.

Yes X **No 0**

The National Accommodation Coordinator takes annual training courses to maintain the Americans with Disabilities Act (ADA) Coordinators Training Certification and to remain abreast of the latest reasonable accommodation (RA) regulations, case law, news, and issues.

All human resources (HR) professionals are required to complete online courses related to veterans' employment, which include disability components. This training, provided by the Treasury Department, is mandated by Executive Order (EO) 13518. HR representatives are also required to complete annual training on the No FEAR Act, which includes a disability component.

The OCC plans a more focused training effort for all HR specialists who are responsible for advising hiring managers regarding use of special hiring authorities.

The Workplace Services team receives contracting officer's technical representative training for overseeing contractor performance.

Staff in Continuing Education responsible for reviewing new content for 508 compliance attended advanced training titled “Web 508 Accessibility BootCamp,” and employees had opportunities to improve 508 compliance skills.

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.

Yes X **No 0**

Section III: 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.

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A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

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.

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

OCC positions can be filled by using Schedule A and Veterans' Appointment Authorities to non-competitively appoint PWD and PWTD and veterans with a service-connected disability rating of 30 percent or more. The OCC's Schedule A Program Manager (PM) continues to evaluate upcoming and current positions for marketing to veterans and PWD. We continue to leverage non-competitive hiring authorities and extend partnerships with veteran service organizations. The PM also received résumés via email from Schedule A applicants and forwarded them to the servicing HR specialists, as well as alerted candidates to submit their résumés online. The PM alerted both hiring managers and HR staffing specialists on the value of hiring external disabled applicants and available resources for locating such candidates.

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-

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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.

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.

Yes X

No 0

N/A 0

- Veteran Employment Training for Federal Hiring Managers: All OCC managers, supervisors, and selected HR professionals are required to complete online courses related to veterans’ employment. This training, provided by the Treasury Department, is mandated by EO 13518 and assigned to those individuals required to take it in the Integrated Talent Management learning system. This training is provided to all newly hired managers, those who become managers, and selected HR professionals throughout the year, and annually to managers, supervisors, and selected HR professionals.
- Merit System Principles, Prohibited Personnel Practices, and Whistleblower Protection: This course covers the merit system principles, prohibited personnel practices, whistleblower protection, role of the Whistleblower Ombudsman, and role of the Office of Special Counsel. Training is offered at least every three years.
- Human Capital Fundamentals for New Managers: This training reviews the OCC’s manager roles and responsibilities, providing guidance to help newly hired or promoted managers. Topics covered include competencies that are central to the manager’s role and responsibilities in human capital management, and HR processes that are essential to successfully performing supervisor functions (e.g., managing telework, administering leave, managing travel, and the use of hiring authorities, including those that take disabilities into account). These sessions are offered two to three times a year for new managers.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

- Hold periodic meetings with professional organizations to share the OCC’s process for providing vacancy announcements, and to share information about opportunities, including career development tracks. These meetings were held with organizations such as George Mason University, George Washington University, Gallaudet University, The Arc-Montgomery County and Northern Virginia, Virginia Department for Aging and Rehabilitative Services, Understood, and Maryland Department of Rehabilitation Services.
- Attend specialty conferences and career/job fairs to share information about the OCC’s mission, work environment, and job opportunities.
- Host brown-bag lunches and roundtable discussions with organizations that assist PWD/PWTD, hiring

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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)	Yes 0	No X
b. New Hires for Permanent Workforce (PWTD)	Yes X	No 0

New B1 in DI:

- PWD Hires: 12.20% vs. 12.0%
- PWTD Hires: 0.00% vs. 2.0%

Hiring rate of PWTD was below the EEOC goal of 2.0 percent.

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.

a. New Hires for MCO (PWD)	Yes 0	No 0
b. New Hires for MCO (PWTD)	Yes 0	No 0

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

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.

a. Qualified Applicants for MCO (PWD)	Yes 0	No 0
b. Qualified Applicants for MCO (PWTD)	Yes 0	No 0

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

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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.

- | | | |
|------------------------------|-------|------|
| a. Promotions for MCO (PWD) | Yes 0 | No 0 |
| b. Promotions for MCO (PWTD) | Yes 0 | No 0 |

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

Section IV: 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.

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B. CAREER DEVELOPMENT OPPORTUNITIES

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

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

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b. Selections (PWTD) **Yes X** No 0

The OCC does not have a formal career development program (CDP); only agencies with formal CDPs are required to collect and report applicant pool data in the MD-715 workforce data tables. The OCC has populated the above Career Development Opportunities table with agency informal career development program data.

For selections, triggers do not exist in any programs.

C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

a. Awards, Bonuses, & Incentives (PWD) **Yes X** No 0
 b. Awards, Bonuses, & Incentives (PWTD) **Yes X** No 0

New B9-2 DI. Compare the inclusion rates for PWD and PWTD with the rates for people with no disabilities.

Time-off hours	PWD	PWTD	No Disability
1-10	2.49%	3.13%	2.55%
11-20	1.66%	4.69%	0.90%
21-30	0.83%	0.00%	0.20%
31-40	0.28%	0.00%	0.23%
Awards	PWD	PWTD	No Disability
< \$500	98.90%	106.25%	111.44%
\$501-999	33.70%	35.94%	35.72%
\$1,000-1,999	11.60%	14.06%	13.90%

The inclusion rates for PWD fell below the inclusion rates for employees with no disabilities in the 1-10 time-off award category. The inclusion rate for PWTD fell below the inclusion rate for employees with no disabilities in the 21-30 and 31-40 time-off award categories. The difference is less than 1 percent and it is not considered a trigger at this time.

The inclusion rates for PWD and PWTD fell below the inclusion rates for employees with no disabilities in the less than \$500 cash award category. The inclusion rate for PWD also fell below the inclusion rate for employees with no disabilities in the \$501-999 and \$1,000-\$1,999 cash award categories. The difference is more than 1 percent and it is a trigger at this time.

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) Yes 0 **No X**
 b. Pay Increases (PWTD) Yes 0 **No X**

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3. If the agency has other types of employee recognition programs, are PWD and/or PWTB 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)	Yes 0	No 0	N/A X
b. Other Types of Recognition (PWTB)	Yes 0	No 0	N/A X

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.

a. SES			
i. Qualified Internal Applicants (PWD)	Yes 0	No 0	
ii. Internal Selections (PWD)	Yes 0	No 0	
b. Grade GS-15			
i. Qualified Internal Applicants (PWD)	Yes 0	No 0	
ii. Internal Selections (PWD)	Yes 0	No 0	
c. Grade GS-14			
i. Qualified Internal Applicants (PWD)	Yes 0	No 0	
ii. Internal Selections (PWD)	Yes 0	No 0	
d. Grade GS-13			
i. Qualified Internal Applicants (PWD)	Yes 0	No 0	
ii. Internal Selections (PWD)	Yes 0	No 0	

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

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2. Does your agency have a trigger involving PWTD among the qualified *internal* applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

a. SES

i. Qualified Internal Applicants (PWTD) Yes 0 No 0

ii. Internal Selections (PWTD) Yes 0 No 0

b. Grade GS-15

i. Qualified Internal Applicants (PWTD) Yes 0 No 0

ii. Internal Selections (PWTD) Yes 0 No 0

c. Grade GS-14

i. Qualified Internal Applicants (PWTD) Yes 0 No 0

ii. Internal Selections (PWTD) Yes 0 No 0

d. Grade GS-13

i. Qualified Internal Applicants (PWTD) Yes 0 No 0

ii. Internal Selections (PWTD) Yes 0 No 0

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

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

a. New Hires to SES (PWD) Yes 0 No 0

b. New Hires to GS-15(PWD) Yes 0 No 0

c. New Hires to GS-14 (PWD) Yes 0 No 0

d. New Hires to GS-13(PWD) Yes 0 No 0

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

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responses for the FY 2023 MD-715 report.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

e. New Hires to SES (PWTD)	Yes 0	No 0
f. New Hires to GS-15 (PWTD)	Yes 0	No 0
g. New Hires to GS-14 (PWTD)	Yes 0	No 0
h. New Hires to GS-13 (PWTD)	Yes 0	No 0

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

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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.

a. Executives

i. Qualified Internal Applicants (PWD)	Yes 0	No 0
ii. Internal Selections (PWD)	Yes 0	No 0

b. Managers

i. Qualified Internal Applicants (PWD)	Yes 0	No 0
ii. Internal Selections (PWD)	Yes 0	No 0

c. Supervisors

i. Qualified Internal Applicants (PWD)	Yes 0	No 0
ii. Internal Selections (PWD)	Yes 0	No 0

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

6. Does your agency have a trigger involving PWTD among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

a. Executives

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0

b. Managers

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0

c. Supervisors

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0

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

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.

a. New Hires for Executives (PWD)	Yes 0	No 0
b. New Hires for Managers (PWD)	Yes 0	No 0
c. New Hires for Supervisors (PWD)	Yes 0	No 0

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

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.

i. New Hires for Executives (PWTD)	Yes 0	No 0
j. New Hires for Managers (PWTD)	Yes 0	No 0
k. New Hires for Supervisors (PWTD)	Yes 0	No 0

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

Section V: Plan to Improve Retention of Persons with Disabilities

To be a 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 personal assistance services.

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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.

Yes 0 No 0 N/A X

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

2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.

a. Voluntary Separations (PWD)	Yes 0	No X
b. Involuntary Separations (PWD)	Yes 0	No X

Old B14 in DI:

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

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.

Voluntary Separations (PWTD)	Yes X	No X
Involuntary Separations (PWTD)	Yes 0	No X

Old B14 in DI:

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

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

In FY 2022, there were 14 exit survey respondents with disabilities: four retired, six accepted other positions, two resigned, one left for personal circumstances, and one was a termination. A large majority (78.6 percent) indicated they would return to work for the OCC/Treasury, and there was nothing that could have been done to prevent them from leaving the agency (71.4 percent). Also, 85.7 percent indicated they would recommend the OCC/Treasury as a good place to work, and 71.4 percent stated they generally had a positive work experience.

Eleven issues were cited by PWD as the primary reasons for leaving (keeping in mind there were 14 respondents): job stress; career growth; four issues that were equally cited—office morale, pay, workload, and cooperativeness and teamwork (relationship with supervisor); availability of resources for office to achieve goals (work experience); and four additional issues that were equally cited—recognition of

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efforts, contributions, and achievements (relationship with supervisor), empowerment to improve performance (relationship with supervisor), demonstration of skills and capabilities (work experience), and job description in relation to actual duties and responsibilities (work experience). In the agency-wide survey results, job stress, pay, workload, office morale, and career growth were cited most often.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 C.F.R. § 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 regarding how to "[File a Complaint](#)" of discrimination. For concerns about the OCC's buildings and facilities, contact:

Facilities Management

Office: (202) 649-7288

TTY: (800) 877-8339 (via a relay service)

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

The OCC continued to work toward ensuring 508 users had necessary information and communication technology to effectively perform their jobs. Focused one-on-one training was provided to 508 users to ensure that the individuals used assistive technologies in the most efficient and effective manner. The OCC also provided training to Editorial and Design Services personnel for checking work product accessibility.

Additionally, the Differently Abled Workforce Network (DAWN) participated with the Veterans Employee

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Network (VEN) to host four “Coffee Break” sessions that covered topics such as mental and physical health awareness, career development resources, and physical growth.

C. REASONABLE ACCOMMODATION PROGRAM

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

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

10 business days or less

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

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

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

Pursuant to 29 C.F.R. § 1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

During FY 2018, the OCC adopted the U.S. Department of the Treasury’s PAS policy and procedures, which follow the requirements established by the Office of Personnel Management. In addition, the Treasury Department has procured a Treasury-wide PAS contract. This contract will allow the OCC to establish a blanket purchase agreement (BPA) against the Treasury-wide base contract. The OCC has set up its BPA with the procurement office to use these services when necessary. To date, the OCC has

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not used these services.

Section VI: 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 government-wide average?

Yes 0 **No X** N/A 0

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?

Yes 0 **No X** N/A 0

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?

Yes 0 **No X** N/A 0

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?

Yes 0 **No X** N/A 0

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 VII: 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?

Yes X No 0

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

Yes X

No 0

N/A 0

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.

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Trigger 1	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.	
Barrier(s)	Underutilization of specific outreach and recruitment strategies for PWD.	
Objective(s)	Increase outreach and recruitment to PWD.	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
All Executive Committee Members; and Joyce Cofield, Executive Director, Office of Minority and Women Inclusion (OMWI)		Yes
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
Yes		Yes
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Reviewed Tables B1, B6, B8, and B14S2 to track the participation pattern across demographic profiles of PWD in mission-critical/major occupations to determine if there is growth in their participation rates.
Complaint Data (Trends)	Yes	Reviewed complaints trend data to determine if PWD raised common issues.
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	Reviewed the questions and responses that support the diversity and inclusion index for PWD in the Federal Employee Viewpoint Survey (FEVS).
Exit Interview Data	Yes	Reviewed responses from PWD to determine common reasons for leaving the

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		agency, and their work experiences.		
Focus Groups	Yes	Reviewed PWD interest group data results on their work experiences and opinions concerning the low representation of PWD employment in the OCC.		
Interviews	Yes	Reviewed interview data from various groups (e.g., interest groups, recruiters, interviewers/panelists, staffing specialists, hiring officials) regarding their experiences and opinions concerning the low representation of PWD employment in the OCC.		
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Reviewed several federal and private sector reports and data from special interest groups to gain additional information on best practices and solutions for addressing low participation of PWD in the OCC's workforce.		
Other (Please Describe)				
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/18	1. The OCC encourages the servicing human resources (HR) specialists and lead recruiters to have active discussions with hiring managers when determining area of consideration to fill vacancies. Educating hiring managers regarding available legal authorities and hiring flexibilities will allow managers to tap into a diverse and active talent pool without going through the lengthy traditional hiring process.	Yes		09/30/22
09/30/18	2. Establish and maintain relationships with organizations that assist PWD in securing and obtaining employment. These organizations include local colleges, universities, and professional organizations.	Yes		09/30/22

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09/30/18	3. Provide annual refresher training to HR specialists about PWD hiring information.	Yes		09/30/22
09/30/18	4. Use the Workforce Recruitment Program (WRP) as a source for recruiting PWD and a pipeline for permanent positions.	Yes		09/30/22
09/30/18	5. The OCC will continue to look for ways to source positions for PWD in other job series (not identified in the trigger, i.e., Office of Management, Public Affairs, and Community Affairs).	Yes		09/30/22
09/30/19	6. Explore opportunities for OCC representatives to recruit/present at PWD events about careers in the federal government.	Yes		09/30/22
09/30/19	7. Expand the use of applicant flow data for more efficient analysis and dialogue with leadership on improving diversity and inclusion for PWD.	Yes		09/30/22
09/30/20	8. Talent Acquisition Operations will send out quarterly emails to all managers/supervisors as a reminder of all available special hiring authorities and resources in recruiting and hiring PWD and WRP applicants.	Yes		09/30/22
Fiscal Year	Accomplishments			
FY 2022	<p>Between FY 2018 and FY 2022, PWD in mission-critical/major occupations (MCO)—bank examiners, attorneys, economists, and IT specialists—participated (7.0 percent) below the EEOC goal of 12.0 percent. In FY 2022, PWD increased participation in three MCO positions from FY 2021—bank examiners (7.2 percent vs. 7.7 percent), IT specialists (11.7 percent vs. 13.3 percent), and attorneys (3.8 percent vs. 4.4 percent).</p> <p>PWD in MCO were hired at a rate of 5.9 percent on average from FY 2018 through FY 2022, below the EEOC goal of 12.0 percent. In FY 2022, 42.9 percent of the OCC hires with disabilities were in MCO, represented by eight bank examiners, three IT specialists, and one attorney. There are limited hiring opportunities in the attorney, economist, and IT specialist occupations. In addition, the OCC continued its focused effort on development and retention of the current workforce.</p> <p>Separations of PWD in MCO (9.5 percent) between FY 2018 and FY 2022 on average were above their workforce participation rate (7.0 percent). In FY 2022, the rate of separations of PWD increased from FY 2021 in all MCO, except economist positions,</p>			

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	which remained at zero.
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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).

<p>Participation rates for PWD have gradually increased over the last five years, from 8.8 percent in FY 2018 to 10.5 percent in FY 2022.</p> <p>No applicant flow analysis was conducted on the applicant flow rate for PWD due to anomalies in the data which compromised the accuracy and integrity of the data results. FY 2022 was a transitional year with applicant tracking data blended from Monster Analytics and USA Staffing data collection systems. Treasury identified significant differences between Monster Analytics and USA Staffing impacting Treasury's ability to collect and track applicant flow data.¹⁹</p> <p>The OCC retained 66.7 percent of its non-competitive Schedule A hires from FY 2018 to FY 2022 and converted 33.3 percent of its eligible Schedule A hires since FY 2018.</p>
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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.

¹⁹ OCRE is working with the EDM team to develop a process for more efficient and accurate data transfer between USA Staffing and Treasury systems. Based on the challenges identified and Treasury's commitment to provide accurate and reliable data, Treasury, on behalf of the OCC as a second-level reporting component, made the decision to exclude applicant flow data from the FY 2022 MD-715 submission. OCRE is hopeful that efforts made in FY 2023 will provide Treasury the opportunity to submit accurate applicant flow data for the FY 2023 MD-715 report.

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Trigger 2	Lower than expected participation rate (percentage) in career development programs (retention focus) for PWD compared with the relevant availability pool.	
Barrier(s)	Insufficient attention to the accessibility of career development and retention activities and programs, and the full participation by PWD in those activities and programs.	
Objective(s)	Increase the retention and the participation of PWD in the OCC's career development programs.	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
All Executive Committee Members; and Joyce Cofield, Executive Director, Office of Minority and Women Inclusion (OMWI)		Yes
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
Yes		Yes
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Reviewed Tables B1 and B14S2 to track the participation pattern across demographic profiles of PWD to determine if there is retention in their participation rates.
Complaint Data (Trends)	Yes	Reviewed complaints trend data to determine if PWD raised common issues.
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	Reviewed the questions and responses that support the diversity and inclusion index for PWD in the Federal Employee Viewpoint Survey (FEVS).
Exit Interview Data	Yes	Reviewed responses from PWD to determine common reasons for leaving the agency, and their work experiences.

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Focus Groups	Yes	Reviewed PWD interest group data results on their work experiences and opinions concerning the low retention of PWD in the OCC.		
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Reviewed several federal and private sector reports and data from special interest groups to gain additional information on best practices and solutions for addressing the retention of PWD in the OCC's workforce.		
Other (Please Describe)				
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/18	1. Encourage PWD to participate in management, leadership, and career development programs through employee network groups (ENG) and a variety of other communication venues throughout the agency.	Yes		09/30/22
09/30/18	2. Share developmental opportunities available throughout the agency with PWD through the ENGs.	Yes		09/30/22
09/30/18	3. Managers should encourage PWD to participate in developmental opportunities that support their career goals at the OCC.	Yes		09/30/22
09/30/19	4. 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	Yes		09/30/22

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	in the competitive service when they discuss their individual development plans (IDP) and performance. Talent Acquisition staff will send managers a quarterly email reminder regarding their employees' eligibility to convert to competitive service.			
09/30/19	5. Partner with Leadership and Development and Continuing Education 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		09/30/22
09/30/20	6. Publish annually or semiannually, if possible, through various methods (e.g., "What's New at the OCC" (WNOCC)/ <i>SuperVisions</i> /OCCnet) information and data on PWD, to include workforce participation, hiring, and separation rates.	Yes		09/30/22
09/30/20	7. Educate all employees and managers/supervisors at least once a year (each) on the reasonable accommodation process by partnering with Differently Abled Workforce Network (DAWN) and OMWI by various educational methods, such as <ul style="list-style-type: none"> • hosting webinars, brown-bag lunches, workshops, and/or panel discussions. • featuring and spotlighting relevant topics, stories, and/or videos in <i>SuperVisions</i>, WNOCC, and on OCCnet. 	Yes		09/30/22
09/30/20	8. Share with all employees semiannually helpful hints,	Yes	09/30/23	

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	best practices, and technology-based information that can support all employees, particularly those with 508 needs. Share through WNOCC, <i>SuperVisions</i> , and OCCnet.			
Fiscal Year	Accomplishments			
FY 2022	Historically, the participation rates of PWD in career development programs were generally absent or below their relevant workforce participation rates for more than five years. However, over the last five years in each career development program, the participation rate of PWD has improved, and PWD are generally participating above their relevant workforce participation rates. In FY 2022, PWD exceeded their workforce participation in all career development programs, except the Leadership Exploration and Development (LEAD) Cohort III Program.			

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

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

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

Participation rates for PWD have gradually increased over the last five years, from 8.8 percent in FY 2018 to 10.5 percent in FY 2022.

No applicant flow analysis was conducted on the applicant flow rate for PWD due to anomalies in the data which compromised the accuracy and integrity of the data results. FY 2022 was a transitional year with applicant tracking data blended from Monster Analytics and USA Staffing data collection systems. Treasury identified significant differences between Monster Analytics and USA Staffing impacting Treasury's ability to collect and track applicant flow data.²⁰

The OCC retained 66.7 percent of its non-competitive Schedule A hires from FY 2018 to FY 2022 and converted 33.3 percent of its eligible Schedule A hires since FY 2018.

9. 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 expanded the focus of its barrier plan to concentrate on the retention and development of its PWD. Planned activities are being executed, monitored, and evaluated.

²⁰ OCRE is working with the EDM team to develop a process for more efficient and accurate data transfer between USA Staffing and Treasury systems. Based on the challenges identified and Treasury's commitment to provide accurate and reliable data, Treasury, on behalf of the OCC as a second-level reporting component, made the decision to exclude applicant flow data from the FY 2022 MD-715 submission. OCRE is hopeful that efforts made in FY 2023 will provide Treasury the opportunity to submit accurate applicant flow data for the FY 2023 MD-715 report.