



The Office of the Comptroller of the Currency's

FY 2021

Affirmative Action Plan

for the

Recruitment, Hiring, Advancement, and

Retention of Persons with Disabilities

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

<u>Section I: Efforts to Reach Regulatory Goals</u>	1
<u>Section II: Model Disability Program</u>	1
A. Plan to Provide Sufficient & Competent Staffing for the Disability Program	2
B. Plan to Ensure Sufficient Funding for the Disability Program	3
<u>Section III: Program Deficiencies in the Disability Program</u>	3
<u>Section IV: Plan to Recruit and Hire Individuals with Disabilities</u>	3
A. Plan to Identify Job Applicants with Disabilities	3
B. Plan to Establish Contacts with Disability Employment Organizations	4
C. Progression Towards Goals (Recruitment and Hiring)	4
<u>Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities</u>	6
A. Advancement Program Plan	6
B. Career Development Opportunities	6
C. Awards	7
D. Promotions	9
<u>Section VI: Plan to Improve Retention of Persons with Disabilities</u>	13
A. Voluntary and Involuntary Separations	13
B. Accessibility of Technology and Facilities	14
C. Reasonable Accommodation Program	15
D. <u>Personal Assistance Services Allowing Employees to Participate in the Workplace</u>	15
<u>Section VII: EEO Complaint and Findings Data</u>	16
A. EEO Complaint Data Involving Harassment	16
B. EEO Complaint Data Involving Reasonable Accommodation	16
<u>Section VIII: Identification and Removal of Barriers</u>	16

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

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

Section I: Efforts to Reach Regulatory Goals

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

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

- | | |
|--------------------------------|------------|
| a. Cluster GS-1 to GS-10 (PWD) | Answer Yes |
| b. Cluster GS-11 to SES (PWD) | Answer Yes |

New B4-1 in Data Insight (DI): The participation rates for PWD in grade clusters, GS-1 to GS-10 was 9.82 percent and GS-11 to SES was 9.61 percent in FY 2021, below the 12 percent goal.

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

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

- | | |
|---------------------------------|------------|
| a. Cluster GS-1 to GS-10 (PWTD) | Answer Yes |
| b. Cluster GS-11 to SES (PWTD) | Answer Yes |

New B4-1 in DI: The participation rates of PWTD in the grade clusters, GS-1 to GS-10 was 1.75 percent and GS-11 to SES was 1.81 percent in FY 2021, below the goal of 2 percent.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	570	56	9.82	10	1.75
Grades GS-11 to SES	2977	286	9.61	54	1.81

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

Numerical goals are communicated through a variety of methods, including the agency's balanced scorecard, internal presentations and briefings, such as the annual MD-715 review, annual business unit briefings, and all special request workforce analyses and reports. The annual MD-715 summary is posted on the OCC's website.

Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

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

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

Answer Yes

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Architectural Barriers Act Compliance	7	1	3	Hans.Heidenreich@occ.treas.gov
Processing reasonable accommodation requests from applicants and employees	1	0	0	Kelly.Battista@occ.treas.gov
Answering questions from the public about hiring authorities that take disability into account	30	1	0	Edner.Escarne@occ.treas.gov
Processing applications from PWD and PWTD	30	1	0	Edner.Escarne@occ.treas.gov
Special Emphasis Program for PWD and PWTD	4	0	0	Joyce.Cofield@occ.treas.gov
Section 508 Compliance	145	0	0	Susan.Obrien@occ.treas.gov

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

Answer Yes

The National Accommodation Coordinator takes annual training courses to maintain the 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 includes disability components. This training, provided by the Treasury Department, is mandated by Executive Order (EO) 13518. HR representatives are also required to complete annual training on the No FEAR Act, which includes a disability component. The OCC plans a more focused training effort for all HR specialists who are responsible for advising hiring managers regarding use of special hiring authorities. The Workplace Services team receives contracting officer’s technical representative training for overseeing contractor performance. Staff in Continuing Education responsible for reviewing new content for 508 compliance attended advanced training titled “Web

508 Accessibility BootCamp,” and employees had opportunities to improve 508 compliance skills.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer Yes

Section III: Program Deficiencies In The Disability Program

Section IV: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency’s recruitment program plan for PWD and PWTD

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

• Utilizes the Workforce Recruitment Program (WRP) as a source for recruiting disabled students and graduating seniors, including disabled veterans. • Maximizes the Pathways Intern Program to hire interns with targeted disabilities. • Continues outreach efforts to Disability and Military Student offices to promote entry-level and internship opportunities. • Participates in recruitment events, fairs, and conferences, e.g., Hiring Heroes, Federal Disability Workforce Consortium, Department of Labor’s WRP Training, and Treasury Department’s Veteran Employment Summit at the Treasury Executive Institute to market the OCC and its job opportunities. • Continues to explore networking websites to enhance outreach efforts to individuals with disabilities. • Works with HR specialists and selecting officials, by way of training and communication meetings, to encourage the use of special appointing authorities. Additionally, RA statements are included on all job announcements to ensure applicants with disabilities are informed of available RA. • Encourages all managers and supervisors to consider the benefits of hiring individuals with disabilities and using the Schedule A hiring authority.

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

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

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

When individuals apply utilizing the Schedule A hiring authority, their applications are reviewed by the servicing HR specialist who

confirms that the applicants meet the qualification requirements of the announced position and have provided required proof of disability. Applicants applying under the Schedule A hiring authority who are deemed qualified are referred to the hiring manager on a Schedule A certificate of eligibility with guidance on selection procedures including the application of veterans' preference, when applicable. Managers have the option to interview and/or hire from the Schedule A certificate or to consider other candidates from other issued certificates (Merit Promotion, Non-Competitive, Veterans Recruitment Appointment, etc.). Alternatively, when individuals submit their résumés directly to the Special Placement Program Coordinator (SPPC) for vacant positions within the OCC, the SPPC refers applicants to the www.occ.gov/careers website to apply for any specific job announcement for which they want consideration. Applicants are also reminded to submit supplemental documentation that makes them eligible for a Schedule A appointment. The OCC also informs applicants, via email, that they must clearly state in the application that they wish to apply via Schedule A.

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

Answer Yes

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

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

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

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

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

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

New B1 in DI: • PWD Hires: 9.42 percent vs. 12.0 percent • PWTD Hires: 0.72 percent vs. 2.0 percent Hiring rates for PWD and PWTD were below the Section 501 goal of 12.0 percent and 2.0 percent, respectively.

New Hires	Total	Reportable Disability		Targeted Disability	
		Permanent	Temporary	Permanent	

	(#)	Workforce (%)	Workforce (%)	Workforce (%)	Temporary Workforce (%)
% of Total Applicants	920	8.59	0.00	3.91	0.00
% of Qualified Applicants	517	6.58	0.00	2.71	0.00
% of New Hires	93	9.68	0.00	6.45	0.00

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

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

Combination of the new B6 in DI and the new B6 in Monster Analytics (Monster). FY 2021 Hires Qualified vs. Hires Qualified vs. Hires 0110: 14 Hires PWD: 8.5% - 0.00% PWTD: 7.45% - 0.00% 0570: 180 Hires PWD: 5.77% - 6.67% PWTD: 1.68% - 1.11% 0905: 9 Hires PWD: 28.57% - 11.11% PWTD: 0.00% - 0.00% The hiring rate for occupation series 0570 for PWD was above their qualified applicant flow rate. The OCC noted a slight difference (0.57 percentage points) in the occupational series 0570 when comparing the applicants with qualified candidates for PWTD. The difference is less than 1 percent and not considered a trigger at this time. Because the OCC has limited hiring of attorneys (0905) and economists (0110), there were not enough hires to determine if there is an actual trigger. With limited hiring, there cannot be a realistic expectation that all groups (PWD and PWTD) would be hired at rates comparable to their qualification rates.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
0110 ECONOMIST	10	10.00	0.00
0570 BANK EXAMINER	82	9.76	7.32
0905 ATTORNEY	1	0.00	0.00

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

- a. Qualified Applicants for MCO (PWD) Answer No
- b. Qualified Applicants for MCO (PWTD) Answer No

New B6 in Monster. Relevant applicant pool is the applied compared with the qualified. NA in qualified applicant means Not Available and ND means No Data FY 2021 Promotions Applicants vs. qualified Applicants vs. qualified 0110: 1 Promotions PWD: 0.00% - 0.00% PWTD: 0.00% - 0.00% 0570: 7 Promotions PWD: 13.17% - 13.37% PWTD: 2.93% - 2.97% 0905: 0 Promotions PWD: 0.00% - 0.00% PWTD: 0.00% - 0.00% The qualified applicant rates for PWD and PWTD in occupation series 0570 were above the applicant rates. NOTE: The Treasury Department/OCC is currently working with its Workforce Analytics contractors to validate its data and align the guidance for internal competitive promotions requested from the EEOC. In FY 2022, the Treasury Department and OCC will develop a plan of action to correct this problem, if not corrected during the fiscal year.

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

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

New B6 in DI and the new B6 in Monster. Compare qualified applicants with promotion in the MCOs. NS in employees' promotions means No Selection. FY 2021 Promotions Qualified vs Promotions Qualified vs Promotions 0110 (1) Promotions: PWD: 0.00% - 0.00% PWTD: 0.00% - 0.00% 0570 (7) Promotions: PWD: 13.37% - 0.00% PWTD: 2.97% - 0.00% 0905 (0) Promotions: PWD: 0.00% - NS PWTD: 0.00% - NS The number of promotions was less than the number of employees; therefore, it is a small sample size to identify a trigger. NOTE: The Treasury Department/OCC is currently working with its Workforce Analytics contractors to validate its data and align the guidance for internal competitive promotions requested from the EEOC. In FY 2022, the Treasury Department and OCC will develop a plan of action to correct this problem, if not corrected during the fiscal year.

Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

A. ADVANCEMENT PROGRAM PLAN

Describe the agency's plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

• Encourage diverse employee (including PWD/PWTD) participation in management, leadership, and career development programs through employee network groups (ENG) and a variety of other communication venues throughout the agency. Developmental opportunities will continue to be broadly communicated to all employees through internal weekly ("What's New at the OCC") and monthly (SuperVisions) newsletters, and website postings. Opportunities also will be shared by ENG's. • Managers will be reminded to consider PWD/PWTD for developmental opportunities as part of their individual development planning process. All vacancy announcements will be posted on the OCC internal careers website.

B. CAREER DEVELOPMENT OPPORTUNITES

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

• The EXCEL I Program, sponsored by the Large Bank Supervision (LBS) department, provides bank examiners in pay band NB-V 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 practices areas. • The Leadership Exploration and Development (LEAD) Program is an enterprise-wide leadership development program targeted to employees at the NB-V to NB-VI.2 levels, to help develop specific competencies aligned to skills and abilities needed at the team leader and/or manager level. • The MCBS NB-V 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. • Agency training and development courses are available to all employees, in the classroom, online, virtual, and self-study. • Temporary details and short-term work assignments are advertised to all employees on the agency's electronic Opportunities Board.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Detail Programs	61	30	6.56%	6.67%	1.64%	0.00%
Other Career Development Programs	570	146	5.26%	5.48%	N/A	0.68%
Training Programs	3547	1576	9.64%	8.88%	1.80%	1.40%
Internship Programs	74	6	6.80%	0.00%	N/A	0.00%
Mentoring Programs	923	19	11.90%	21.05%	2.10%	0.00%
Coaching Programs	1598	131	7.50%	1.50%	7.60%	1.50%
Fellowship Programs	N/A	N/A	N/A	N/A	N/A	N/A

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

- a. Applicants (PWD) Answer Yes
- b. Selections (PWD) Answer Yes

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 tables with agency informal career development program data. For selections, triggers exist in all programs, except the Mentoring, Detail, and Other Career Development Career Development Programs.

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

- a. Applicants (PWTD) Answer Yes
- b. Selections (PWTD) Answer Yes

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 tables with agency informal career development program data. For selections, triggers exist in all programs, except the Internship and Other Career Development Career Development Programs.

C. AWARDS

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

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

New B9-2 DI. Compare the inclusion rates for PWD and PWTD with the rates for people with no disabilities. Time-off hours PWD PWTD No Disability 1-10 0.58% 1.56% 1.18% 11-20 0.29% 1.56% 0.16% 21-30 0.00% 0.00% 0.06% 31-40 0.29% 1.56% 0.10% Awards PWD PWTD No Disability < \$500 57.89% 45.31% 63.27% \$501-999 28.07% 28.13% 26.31% \$1000-1999 11.70% 12.50% 10.07% The inclusion rates for PWD fell below the inclusion rates for employees with no disabilities in the 1-10 and 21-30

time-off award categories. The inclusion rate for PWTB fell below the inclusion rate for employees with no disabilities in the 21-30 time-off award category. The OCC noted differences in inclusion rates for PWD and PWTB time-off awards when comparing the inclusion rates of employees with no disabilities. The difference is less than 1 percent and it is not considered a trigger at this time. The inclusion rates for PWD and PWTB fell below the inclusion rates for employees with no disabilities in the less than \$500 cash award category. The difference is more than 1 percent and it is a trigger at this time.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	39	0.58	1.18	1.56	0.36
Time-Off Awards 1 - 10 Hours: Total Hours	299	4.39	9.02	14.06	2.16
Time-Off Awards 1 - 10 Hours: Average Hours	7.67	2.19	0.24	14.06	-0.54
Time-Off Awards 11 - 20 hours: Awards Given	6	0.29	0.16	1.56	0.00
Time-Off Awards 11 - 20 Hours: Total Hours	104	4.68	2.80	25.00	0.00
Time-Off Awards 11 - 20 Hours: Average Hours	17.33	4.68	0.56	25.00	0.00
Time-Off Awards 21 - 30 hours: Awards Given	2	0.00	0.06	0.00	0.00
Time-Off Awards 21 - 30 Hours: Total Hours	48	0.00	1.53	0.00	0.00
Time-Off Awards 21 - 30 Hours: Average Hours	24	0.00	0.76	0.00	0.00
Time-Off Awards 31 - 40 hours: Awards Given	4	0.29	0.10	1.56	0.00
Time-Off Awards 31 - 40 Hours: Total Hours	160	11.70	3.81	62.50	0.00
Time-Off Awards 31 - 40 Hours: Average Hours	40	11.70	1.27	62.50	0.00
Time-Off Awards 41 or more Hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	939	28.07	26.31	28.13	28.06
Cash Awards: \$501 - \$999: Total Amount	636621	18644.44	17863.90	19043.75	18552.52
Cash Awards: \$501 - \$999: Average Amount	677.98	194.21	21.57	1057.98	-4.64
Cash Awards: \$1000 - \$1999: Awards Given	358	11.70	10.07	12.50	11.51
Cash Awards: \$1000 - \$1999: Total Amount	385122	12614.04	10832.03	13715.63	12360.43
Cash Awards: \$1000 - \$1999: Average Amount	1075.76	315.35	34.17	1714.45	-6.74
Cash Awards: \$2000 - \$2999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Total Amount	0	0.00	0.00	0.00	0.00

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

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If “yes”, please describe the trigger(s) in the text box.

a. Pay Increases (PWD) Answer No

b. Pay Increases (PWTD) Answer No

N/A

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

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.

a. Other Types of Recognition (PWD) Answer N/A

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

N/A

D. PROMOTIONS

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. SES

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

New B7 DI and the new B7 Monster. NA in qualified applicant means Not Available. NS in employees' promotions means No Selections. Relevant Applicants/Qualified/Promotions GS-13 - PWD: 16.92% – NA – 36.36% GS-14 - PWD: 11.45% – NA – 16.67% GS-15 - PWD: 7.85% – NA – 0.00% SES - PWD: 6.27% – 20.00% – NS NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics. In FY 2022, the Treasury Department and OCC will develop a plan of action to correct this problem, if not corrected during the fiscal year.

2. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

New B7 DI and the new B7 Monster. NA in qualified applicant means Not Available. NS in employees' promotions means No Selections. Relevant Applicants/Qualified/Promotions GS-13 - PWT: 2.31% - NA - 9.09% GS-14 - PWT: 2.09% - NA - 3.33% GS-15 - PWT: 1.52% - NA - 0.00% SES - PWT: 1.65% - 0.00% - NS NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics. In FY 2022, the Treasury Department and OCC will develop a plan of action to correct this problem, if not corrected during the fiscal year.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

New B7 WA and the new B7 Monster. NA in qualified applicant means Not Available. Qualified Applicants/Hires GS-13 - PWD: NA - 14.13% GS-14 - PWD: NA - 9.09% GS-15 - PWD: NA - 0.00% SES - PWD: NA - 0.00% NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics. In FY 2022, the Treasury Department and OCC will develop a plan of action to correct this problem, if not corrected during the fiscal year.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWT among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires to SES (PWT) Answer No
- b. New Hires to GS-15 (PWT) Answer No
- c. New Hires to GS-14 (PWT) Answer No
- d. New Hires to GS-13 (PWT) Answer No

New B7 WA and the new B7 Monster. NA in qualified applicant means Not Available. Qualified Applicants/Hires GS-13 - PWT: NA - 1.09% GS-14 - PWT: NA - 0.00% GS-15 - PWT: NA - 0.00% SES - PWT: NA - 0.00% NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics. In FY 2022, the Treasury Department and OCC will develop a plan of action to correct this problem, if not corrected during the fiscal year.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Executives
 - i. Qualified Internal Applicants (PWD) Answer No

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

New B8 DI and the new B8 Monster. NA in qualified applicant means Not Available. Relevant Pool/Qualified Applicants/Promotions Executives - PWD: 8.46% - 20.00% - 0.00% Managers - PWD: NA - NA - 20.00% There were no internal supervisor vacancy announcements or selections. NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics. In FY 2022, the Treasury Department and OCC will develop a plan of action to correct this problem, if not corrected during the fiscal year.

6. Does your agency have a trigger involving PWTB among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives		
i. Qualified Internal Applicants (PWTB)	Answer	No
ii. Internal Selections (PWTB)	Answer	No
b. Managers		
i. Qualified Internal Applicants (PWTB)	Answer	No
ii. Internal Selections (PWTB)	Answer	No
c. Supervisors		
i. Qualified Internal Applicants (PWTB)	Answer	No
ii. Internal Selections (PWTB)	Answer	No

New B8 DI and new B8 Monster. NA in qualified applicant means Not Available. Relevant Applicant/Qualified Applicants/Promotions Executives - PWTB: 0.63% - 0.00% - 0.00% Managers - PWTB: NA - NA - 0.00% The OCC noted a difference in qualified applicant rate for PWTB when comparing the relevant applicant rate. The difference is less than 1 percent and it is not considered a trigger at this time. There were no internal supervisor vacancy announcements and selections. NOTE: The OCC has no "supervisors" in GS-12 and below equivalent grades. The OCC's supervisory/managerial positions begin at GS-13 and above equivalent levels. NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics. In FY 2022, the Treasury Department and OCC will develop a plan of action to correct this problem, if not corrected during the fiscal year.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for Executives (PWD) Answer No
- b. New Hires for Managers (PWD) Answer No
- c. New Hires for Supervisors (PWD) Answer No

New B8 DI and new B8 Monster. NA in qualified applicant means Not Available. Qualified Applicants/Hires Executives - PWD: NA - 0.00% Managers - PWD: NA - 0.00% There were no external supervisor vacancy announcements and selections. NOTE: The OCC's supervisory/managerial positions begin at GS-13 and above equivalent levels. The OCC has no "supervisors" in GS-12 and below equivalent grades. NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics. In FY 2022, the Treasury Department and OCC will develop a plan of action to correct this problem, if not corrected during the fiscal year.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for Executives (PWTB) Answer No
- b. New Hires for Managers (PWTB) Answer No
- c. New Hires for Supervisors (PWTB) Answer No

New B8 DI and new B8 Monster. NA in qualified applicant means Not Available. Qualified Applicants/Hires Executives - PWTB: 0.00% - 0.00% Managers - PWTB: NA - 0.00% There were no external supervisor vacancy announcements and selections. NOTE: The OCC has no "supervisors" in GS-12 and below equivalent grades. The OCC's supervisory/managerial positions begin at GS-13 and above equivalent levels. NOTE: The Treasury Department/OCC worked with Monster Analytics to populate applicant flow data through CareerConnector. However, an error occurred in the data processing for cross-walking the OCC's NB pay plan to the GS pay plan, which is currently being corrected by Monster Analytics. In FY 2022, the Treasury Department and OCC will develop a plan of action to correct this problem, if not corrected during the fiscal year.

Section VI: Plan to Improve Retention of Persons with Disabilities

To be model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace assistance services.

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If "no", please explain why the agency did not convert all eligible Schedule A employees.

Answer N/A

There were no Schedule A hires in FY 2019 due to limited external hiring, which ultimately means there were no conversions in FY 2021. The OCC continued to revise its staffing priorities in FY 2019, resulting in fewer external hires with a focused effort on development and retention of the current workforce.

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

- a. Voluntary Separations (PWD) Answer No

b.Involuntary Separations (PWD)

Answer Yes

Old B14 in DI: The inclusion rate for PWD exceeded the rate of persons with no disabilities for involuntary (0.29 percent vs. 0.10 percent).

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	5	0.29	0.12
Permanent Workforce: Resignation	83	1.46	2.43
Permanent Workforce: Retirement	136	3.51	3.86
Permanent Workforce: Other Separations	41	2.05	1.06
Permanent Workforce: Total Separations	265	7.31	7.48

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

a.Voluntary Separations (PWTD)

Answer Yes

b.Involuntary Separations (PWTD)

Answer No

Old B14 in DI: The inclusion rate of PWTD (9.38 percent) exceeded the rate of persons without disabilities for voluntary separations (7.34 percent).

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	5	0.00	0.14
Permanent Workforce: Resignation	83	1.56	2.35
Permanent Workforce: Retirement	136	4.69	3.81
Permanent Workforce: Other Separations	41	3.13	1.12
Permanent Workforce: Total Separations	265	9.38	7.43

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 2021, there were seven exit survey respondents with disabilities: three retired, three accepted other positions, and one resigned. A large majority (71.4 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. Also, 57.1 percent indicated they would recommend the OCC/Treasury as a good place to work, and they generally had a positive work experience. Eight issues were cited by PWD as the primary reasons for leaving (keeping in mind there were only seven respondents): job stress; career growth; and the remaining six issues were equally cited—office morale, pay, workload, cooperativeness and teamwork (relationship with supervisor), demonstration of skills and capabilities (work experience), and recognition of efforts, contributions, and achievements (relationship with supervisor). In the agency-wide survey results, job stress, career growth, office morale, pay, and workload were cited most often.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

1.

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

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

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

To file a complaint, go to this webpage and click on the link titled "File a Complaint." https://www.treasury.gov/about/organizational-structure/offices/Mgt/Documents/Section508_Complaint_Processing.pdf For concerns about OCC's buildings and facilities, contact: Facilities Management Office: (202) 649-7288 TTY: (800) 877-8339 (via a relay service)

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

The OCC continued to work toward ensuring 508 users had necessary information and communication technology (ICT) to effectively perform their jobs. In FY 2021, the OCC recertified its 508 policy and procedures manual, "IT Accessibility (Section 508) Program." Focused one-on-one training was provided to 508 users to ensure that the individuals were using assistive technologies in the most efficient and effective manner. The OCC also provided training to IT support personnel and developers on three assistive technology software applications. Additionally, the Differently Abled Workforce Network (DAWN) participated with the Veterans Employee Network (VEN) to host four "Coffee Breaks" that covered topics such as service animals and pets and reasonable accommodations.

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 2021, 95 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 2021, and will continue to do so in FY 2022. The OCC will be conducting mandatory RA training at the beginning of FY 2022. Preparation work has been occurring throughout FY 2021.

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

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

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

During FY 2018, the OCC adopted the U.S. Department of the Treasury's PAS policy and procedures, which follow the requirements established by the OPM. In addition, the Treasury Department has procured a Treasury-wide PAS contract. This contract will allow the OCC to establish a blanket purchase agreement (BPA) against the Treasury-wide base contract. The OCC has set up its BPA with the procurement office to use these services when necessary. To date, the OCC has not used these services.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the governmentwide average?

Answer Yes

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer Yes

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?

Answer No

2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?

Answer Yes

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.

One finding of discrimination without a hearing: monetary benefits issued to Complainant, mandatory training completed by management official, and posting notice of violation.

Section VIII: Identification and Removal of Barriers

Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Answer Yes

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

Answer Yes

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments

Source of the Trigger:	Workforce Data (if so identify the table)				
Specific Workforce Data Table:	Workforce Data Table - B6				
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Lower than expected participation rate (percentage) of PWD in the following occupational series: national bank examiner (570), attorney (905), economist (110), and information technology specialist (2210), compared with EEOC goal of 12 percent.				
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> People with Disabilities				
Barrier Analysis Process Completed?:	Y				
Barrier(s) Identified?:	Y				
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Barrier Name		Description of Policy, Procedure, or Practice		
	Failure to consistently use specific outreach and recruitment strategies for PWD.		Failure to consistently use specific outreach and recruitment strategies for PWD.		
Objective(s) and Dates for EEO Plan					
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
10/01/2005	09/30/2024	Yes			Increase outreach and recruitment to PWD.
Responsible Official(s)					
Title		Name		Standards Address The Plan?	
Senior Deputy Comptroller		All Executive Committee Members		Yes	
Executive Director, Office of Minority and Women Inclusion		Joyce Cofield		Yes	

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2018	The OCC encourages the servicing HR specialists and recruiters to have active discussions with hiring managers when determining area of consideration to fill vacancies. Educating hiring managers regarding available legal authorities and hiring flexibilities will allow managers to tap into a diverse and active talent pool without going through the lengthy traditional hiring process.	Yes		09/30/2021
09/30/2018	Establish and maintain relationships with organizations that assist PWD in securing and maintaining employment. These organizations include local colleges, universities, and professional organizations.	Yes		09/30/2021
09/30/2018	Provide annual refresher training to HR specialists about PWD hiring information.	Yes		09/30/2021
09/30/2018	Use the WRP Program as a source for recruiting PWD and a pipeline for permanent positions.	Yes		09/30/2021
09/30/2018	The OCC will continue to look for ways to source positions for PWD in other job series (not identified in the trigger).	Yes		09/30/2021
09/30/2019	Explore opportunities for OCC representatives to present at a conference/recruitment event about careers in the federal government for PWD.	Yes		09/30/2021
09/30/2019	Improve applicant tracking to enable use for individual vacancy applicant pools.	Yes		09/30/2021
09/30/2019	Host an event to recognize National Disability Day and the launch of the Differently Abled Workforce Network (DAWN).	Yes		09/30/2021
09/30/2020	Send out an email to all managers/supervisors as a reminder of all available special hiring authorities and resources in recruiting and hiring PWD and WRP positions.	Yes		09/30/2021

Report of Accomplishments	
Fiscal Year	Accomplishment
2021	<p>Between FY 2017 and FY 2021, PWD in mission-critical/major occupations (MCO)—bank examiners, attorneys, economists, and IT specialists—participated (6.8 percent) below the EEOC goal of 12.0 percent. In FY 2021, PWD increased participation in two MCO positions from FY 2020—bank examiners (7.0 percent vs. 7.2 percent) and IT specialists (10.8 percent vs. 11.7 percent).</p> <p>PWD in MCO were hired at a rate of 4.0 percent on average from FY 2017 through FY 2021, below the EEOC goal of 12.0 percent. In FY 2021, 53.8 percent of the OCC hires with disabilities were in MCO, represented by 12 bank examiners, one attorney, and one IT specialist. 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 (8.2 percent) between FY 2017 and FY 2021 on average were above their workforce participation rate (6.8 percent). In FY 2021, the rate of separations of PWD decreased from FY 2020 in all MCO, except attorneys—bank examiner (9.5 percent vs. 6.9 percent), IT specialist (12.5 percent vs. 11.1 percent), and economist (16.7 percent vs. 0.0 percent) positions.</p>

Source of the Trigger:	Workforce Data (if so identify the table)					
Specific Workforce Data Table:	Workforce Data Table - B14					
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Lower than expected participation rate (percentage) in career development programs (retention focus) for PWD compared with the relevant workforce participation rate.					
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> People with Disabilities					
Barrier Analysis Process Completed?:	Y					
Barrier(s) Identified?:	Y					
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Barrier Name		Description of Policy, Procedure, or Practice			
	Career Development and Retention Activities		Lack of consistent attention to career development and retention activities and programs that specifically support PWD.			
Objective(s) and Dates for EEO Plan						
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description	
10/01/2005	09/30/2024	Yes			Increase the retention and the participation of PWD in the OCC's career development programs.	
Responsible Official(s)						
Title		Name		Standards Address The Plan?		
Senior Deputy Comptrollers		All Executive Committee Members		Yes		
Executive Director, Office of Minority and Women Inclusion		Joyce Cofield		Yes		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2018	Encourage PWD to participate in management, leadership, and career development programs through ENGs and a variety of other communication venues throughout the agency.			Yes		09/30/2021

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2018	Share developmental opportunities available throughout the agency with PWD through the ENGs.	Yes		09/30/2021
09/30/2018	Managers will encourage PWD to participate in developmental opportunities that support their career goals at the OCC.	Yes		09/30/2021
09/30/2019	Managers are strongly encouraged to manage the date the employee is eligible for conversion into the competitive service and work with their HR point of contact to plan for the conversion. Employees who were hired on a Schedule A permanent appointment are also strongly encouraged to include semi-annual discussions with their supervisor regarding conversion to permanent status in the competitive service when they discuss their individual development plans (IDP) and performance. Send managers a quarterly email reminder regarding their employees' eligibility to convert to competitive service.	Yes		09/30/2021
09/30/2019	Hold annual self-identification campaigns during National Disability Employment Awareness Month.	Yes		09/30/2021
09/30/2019	Partner with Leadership and Development (LD) and Continuing Education (CE) to a) ensure concerns associated with PWD are considered in course development. b) enhance OCC courses with language that clearly is more inclusive of PWD.	Yes		09/30/2021
09/30/2020	Publish semiannually through various methods (e.g., "What's New at the OCC" (WNOCC)/ SuperVisions/ OCCnet) information and data on PWD, to include workforce participation, hiring, and separation rates.	Yes		09/30/2021
09/30/2020	Educate all employees and managers/supervisors at least once a year (each) on the reasonable accommodation process by partnering with DAWN and OMWI by various educational methods, such as • hosting webinars, brown-bag lunches, workshops, and/or panel discussions. • featuring and spotlighting relevant topics, stories, and/or videos in SuperVisions, WNOCC, and on OCCnet.	Yes		09/30/2021
09/30/2020	Share with all employees semiannually helpful hints, best practices, and technology-based information that can support all employees, particularly those with 508 needs. Share through WNOCC, SuperVisions, and OCCnet.	Yes		09/30/2021
Report of Accomplishments				
Fiscal Year	Accomplishment			
2021	The participation rates of PWD in career development programs were generally absent or below their relevant workforce participation rates for more than five years. In FY 2021, PWD exceeded their workforce participation in two career development programs, the Executive Coaching Program (7.6 percent vs. 7.5 percent) and the Leadership courses (9.7 percent vs. 9.6 percent).			

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

Due to resource constraints, the OCC published one WNOCC that shared information with all employees such as helpful hints, best practices, and technology-based information about 508 needs.

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

Participation rates for PWD have gradually increased over the last five years, from 8.3 percent in FY 2017 to 9.6 percent in FY 2021. In FY 2021 (as of August 27, 2021), the applicant flow rate for PWD was 22.9 percent and the selection rate was 10.5 percent. While the applicant flow rate exceeded the EEOC goal of 12.0 percent, the selection rate fell below the goal. The OCC retained 75.0 percent of its non-competitive Schedule A hires from FY 2017 to FY 2021 and converted 62.5 percent of its eligible Schedule A hires since FY 2017.

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

The OCC changed the focus of its barrier plan to concentrate on its MCO and added activities that support these occupations. Planned activities are being executed, monitored, and evaluated. The OCC expanded the focus of its barrier plan to concentrate on the retention and development of its PWD. Planned activities are being executed, monitored, and evaluated.