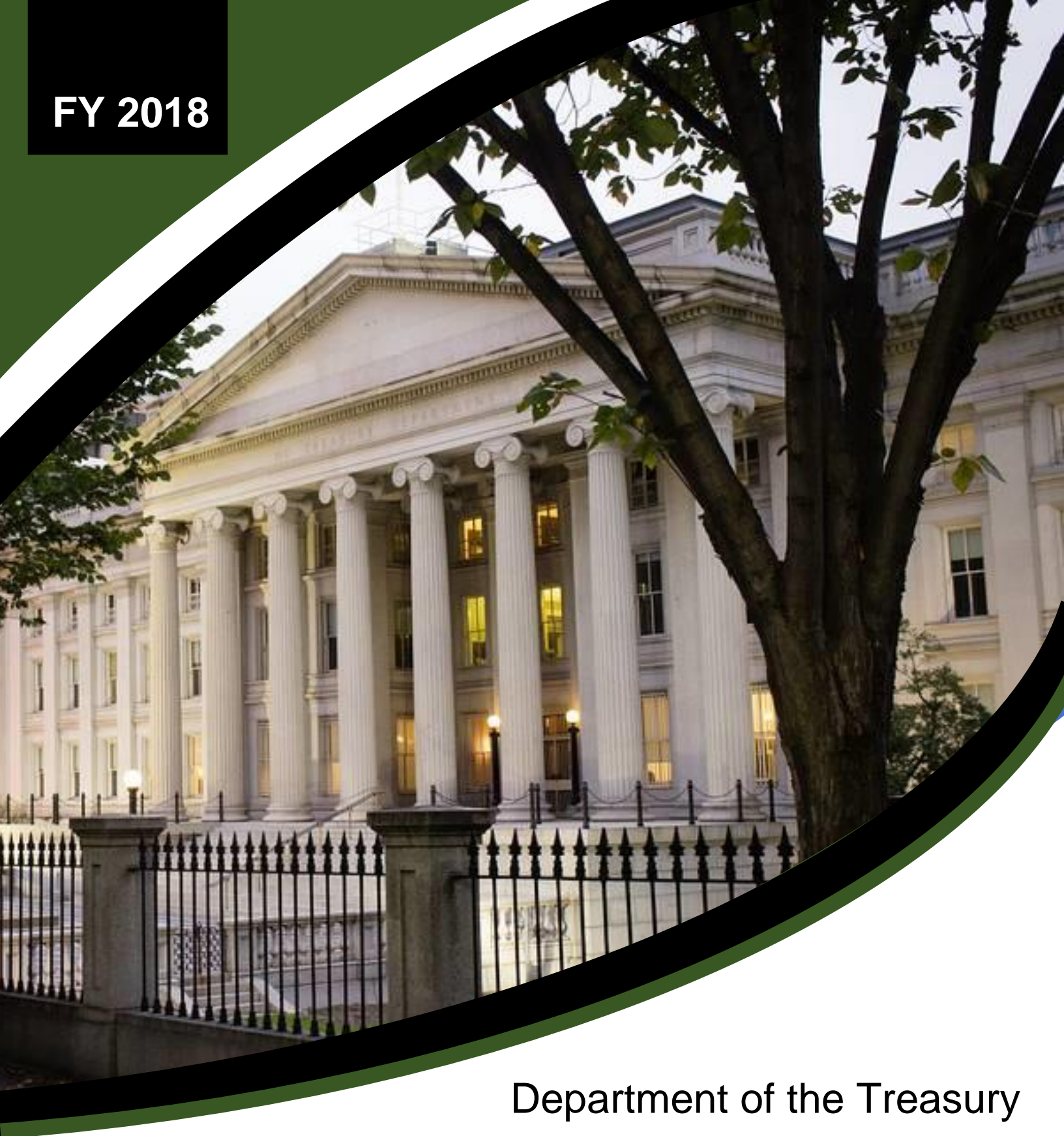


FY 2018



Department of the Treasury  
**Management  
Directive 715**



**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 the Treasury	N/A	1500 Pennsylvania Ave, NW	Washington	DC	20220	TR	11001

**Part B - Total Employment**

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	91179	1686	92865

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

Agency Leadership	Name	Title
Head of Agency	Steven T. Mnuchin	Secretary, Department of the Treasury
Head of Agency Designee	David F. Eisner	Assistant Secretary for Management

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

EEO Program Staff	Name	Title	Occupational Series (xxxx)	Pay Plan and Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
Principal EEO Director/Official	Mariam Harvey	Director (OCD)	0260	ES	202-622-0316	<a href="mailto:Mariam.Harvey@treasury.gov">Mariam.Harvey@treasury.gov</a>
Deputy Director EEO	Snider Page	Deputy Director (OCD)	0260	GS-15	202-622-0341	<a href="mailto:Snider.Page@treasury.gov">Snider.Page@treasury.gov</a>
Affirmative Employment Program Manager	Tina Lancaster	Manager of EEO Programs	0260	GS-15	202-622-1079	<a href="mailto:Tina.Lancaster@treasury.gov">Tina.Lancaster@treasury.gov</a>

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Complaint Processing Program Manager	Amelia Demopulos	EEO Program Manager	0260	GS-15	202-622-4178	<a href="mailto:Ameila.Demopulos@treasury.gov">Ameila.Demopulos@treasury.gov</a>
Manager of Special Emphasis Programs	Tina Lancaster	Manager of EEO Programs	0260	GS-15	202-622-1079	<a href="mailto:Tina.Lancaster@treasury.gov">Tina.Lancaster@treasury.gov</a>
Diversity & Inclusion Program Manager	Thomas Lotito	EEO Specialist	0260	GS-14	202-622-8902	<a href="mailto:Thomas.Lotito@treasury.gov">Thomas.Lotito@treasury.gov</a>
Disability Program Manager (SEPM)	Lisa Jones	EEO Specialist	0260	GS-14	202-622-0315	<a href="mailto:Lisa.Jones@treasury.gov">Lisa.Jones@treasury.gov</a>
Special Placement Program Coordinator (Individuals with Disabilities)	Lisa Jones	EEO Specialist	0260	GS-14	202-622-0315	<a href="mailto:Lisa.Jones@treasury.gov">Lisa.Jones@treasury.gov</a>
Reasonable Accommodation Program Manager	Lisa Jones	EEO Specialist	0260	GS-14	202-622-0315	<a href="mailto:Lisa.Jones@treasury.gov">Lisa.Jones@treasury.gov</a>
Anti-Harassment Program Manager	Clarissa Lara	EEO Specialist	0260	GS-14	512-499-5115	<a href="mailto:Clarissa.Lara@treasury.gov">Clarissa.Lara@treasury.gov</a>
ADR Program Manager	Clarissa Lara	EEO Specialist	0260	GS-14	512-499-5115	<a href="mailto:Clarissa.Lara@treasury.gov">Clarissa.Lara@treasury.gov</a>
Compliance Manager	Ellen Hawthorne-Copenhaver	EEO Specialist	0260	GS-14	202-622-0341	<a href="mailto:Ellen.Hawthorne-Copenhaver@treasury.gov">Ellen.Hawthorne-Copenhaver@treasury.gov</a>
Principal MD-715 Preparer	Alicia Whittington	EEO Specialist	0260	GS-15	202-927-1093	<a href="mailto:Alicia.Whittington@treasury.gov">Alicia.Whittington@treasury.gov</a>

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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.

<b>Subordinate Component</b>	<b>City</b>	<b>State</b>	<b>Country (Optional)</b>	<b>Agency Code (xxxx)</b>	<b>FIPS Codes (xxxxx)</b>
Alcohol and Tobacco Tax and Trade Bureau	Washington	DC	US	TR40	11001
Bureau of Engraving and Printing	Washington	DC	US	TRAI	11001
Fiscal Service	Parkersburg	WV	US	TRFD	54107
Departmental Offices	Washington	DC	US	TR91	11001
Financial Crimes Enforcement Network	Fairfax	VA	US	TRAF	51600
Internal Revenue Service	Washington	DC	US	TR93	11001
Internal Revenue Service Chief Counsel	Washington	DC	US	TR93(88)	11001
United States Mint	Washington	DC	US	TRAD	11001
Office of the Comptroller of the Currency	Washington	DC	US	TRAJ	11001
Office of the Inspector General	Washington	DC	US	TR95	11001
Special Inspector General for Troubled Asset Relief Program	Washington	DC	US	TRRP	11001
Treasury Inspector General for Tax Administration	Washington	DC	US	TRTG	11001

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## **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.

<b>Did the agency submit the following mandatory documents?</b>	<b>Please respond Yes or No</b>	<b>Comments</b>
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.

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

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## 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 Part E.2 to E.5.

### Part E.1 - Executive Summary: Mission

#### Introduction/Mission

This report covers the period of October 1, 2017, through September 30, 2018, and highlights the Department of the Treasury's accomplishments during Fiscal Year (FY) 2018 in attaining and maintaining a model EEO Program.

#### The Department of the Treasury's Mission

Treasury remains one of the world's premier finance ministries, responsible for the nation's debt management, cash production, loans made to other federal agencies, tax collection, and economic policy formulation. We are a trusted policy advisor to the President, formulating and recommending domestic and international financial, economic, and tax policy. Our contributions to policy development shape America's economic health and security.

Treasury's mission is to maintain a strong economy and create economic and job opportunities by promoting the conditions that enable economic growth and stability at home and abroad, strengthen national security by combatting threats and protecting the integrity of the financial system, and manage the U.S. Government's finances and resources effectively.

The nearly 100,000 dedicated Treasury employees strive to maintain **integrity** and uphold the public trust in all that we do, explore better ways of conducting business through **innovation**, seek diversity of thought and **expertise** to inform our decisions, embrace and **adapt** to change, and hold ourselves **accountable** for accomplishing meaningful results for the American public.

#### Organization

The Department of the Treasury is organized into the Departmental Offices, eight operating bureaus, and three Offices of the Inspectors General. The Departmental Offices is primarily responsible for the formulation of policy, while the operating bureaus carry out the specific operations assigned to the Department.

#### Organizational Reporting Structure

For Equal Employment Opportunity Commission (EEOC) Management Directive (MD) 715 reporting purposes, Treasury's second-level reporting bureaus are:

- Bureau of Engraving and Printing (BEP)
- Fiscal Service (FS)
- Departmental Offices (DO)
- Internal Revenue Service (IRS)
- Internal Revenue Service Office of the Chief Counsel (IRS-CC)
- Office of the Comptroller of the Currency (OCC) and
- U.S. Mint (Mint)

Bureaus employing fewer than 1,000 employees are required to provide their individual MD-715 reports to Treasury's Office of Civil Rights and Diversity (OCD) for inclusion in the Treasury's overall report. These bureaus are Financial Crimes Enforcement Network (FinCEN), the Office of the Inspector General

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(OIG), Special Inspector General for Troubled Asset Relief Program (SIGTARP), Treasury Inspector General for Tax Administration (TIGTA), and Alcohol and Tobacco Tax and Trade Bureau (TTB).

Each Treasury bureau, regardless of size, has its own distinct reporting structure for its EEO and Human Resource (HR) offices and programs. Each bureau sets its own policy and procedures regarding the hiring, recruitment, and retention of employees within the broad framework of the Department's Human Capital Strategy. The Office of Civil Rights and Diversity (OCD), part of the Departmental Offices' organizational structure, is primarily responsible for providing guidance and oversight to the bureau EEO offices.

### **The Office of Civil Rights and Diversity**

The Office of Civil Rights and Diversity administers the Department-wide equal employment opportunity (EEO) and diversity (EEO-5) program by providing policy, oversight, and technical guidance to Treasury bureaus, including the Departmental Offices, on affirmative employment, special emphasis program areas, diversity, and EEO complaint processing.

In addition, OCD oversees Treasury's external civil rights efforts to ensure non-discrimination in programs operated or funded by the Department of the Treasury. The OCD's External Civil Rights Program ensures individuals are not excluded from participation in, denied the benefits of, or otherwise subjected to prohibited discrimination under programs or activities conducted or funded by the Department.

OCD also manages all stages of the formal complaint process including final agency actions on discrimination complaints filed by Treasury employees and applicants for employment.

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

N/A

## **Part E.3 - Executive Summary: Workforce Analyses**

### **Workforce Demographics**

The following are Treasury's workforce demographic trends over the period of FY 2009 to FY 2018<sup>1</sup>. The area where participation rates have been of the most concern government wide and at the Department have been the distribution of women and non-Whites in the General Schedule grades (GS) 13 through 15, the Senior Executive Service (SES) and equivalent pay plans (OR, TR, IR and NB), and the participation rates for Hispanics and persons with disabilities (PWD) and persons with targeted disabilities (PWTD).

Throughout the last two years, Treasury and its bureaus have had significant decreases to their budgets and have been in either a hiring freeze or have had limited hiring opportunities. Because of this, some bureaus have had limited opportunity either to conduct meaningful analysis or to evaluate previously established plans to determine their effectiveness.

Additionally, for a cabinet-level agency the size of Treasury, data typically varies only by tenths of a percent from one year to the next. However, when evaluating trends over time, and as a result of the bureaus' efforts to improve diversity in those areas with lower than expected participation rates, Treasury has noted significant progress in increased participation rates for women and minorities in SES positions

<sup>1</sup> Enterprise Data Management System, Treasury's system of record, maintains employment data that covers a rolling period of 10 years. Beginning in FY 2018, data for trend analysis was available for FY 2009 through FY 2018.



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as well as the feeder pools, and for the overall participation rate for Hispanics, PWD and PWTD.

As of the end of FY 2018, the permanent workforce participation rate of Hispanics was 11.73 percent. This is an overall increase of almost 2 percent when compared to the 9.84 percent participation rate noted in FY 2009. This participation rate is above both the Civilian Labor Force (CLF) (9.96 percent) and Relevant Civilian Labor Force (RCLF) (8.50 percent) availability rates.

### **Participation Rates in the Permanent Workforce**

As of the close of FY 2018, Treasury had 91,179 permanent employees<sup>2</sup>, a decrease of 5,171 (-5.37 percent net change) employees from FY 2017. This decrease is primarily due to reduced budgets which have significantly limited or reduced hiring opportunities for many of the Treasury's bureaus in FY 2018.

Treasury and its bureaus continue to utilize the RCLF tool updated at the end of FY 2018, which provides a more realistic benchmark comparator. The RCLF is based off of the National Civilian Labor Force. However, rather than calculating a weighted average for all available occupations in the federal government, it calculates the expected labor force based on a weighted average of only those occupations in Treasury's workforces.

A comparison of FY 2018 participation rates in Treasury's permanent workforce for men and women shows little change from FY 2009. However, based on the RCLF availability rates, we see that women (62.05 percent compared to 64.98 percent RCLF) and men (37.95 percent compared to 35.02 percent RCLF) are participating at rates very close to their RCLF availability rates. Additionally, based on the RCLF, Treasury has a better understanding as to why the participation rate for women at the Department is significantly above the CLF availability rate (48.14 percent CLF compared to 64.98 percent RCLF) and the participation rate for men is significantly below the CLF availability rate (51.86 percent CLF compared to 35.02 percent RCLF).

In FY 2009, Treasury's permanent workforce was 59.90 percent White and 40.1 percent non-White. In FY 2018, the participation rate for Whites decreased to 53.83 percent of the workforce and non-Whites increased to 46.17 percent. Thus, Treasury has noted a significant positive trend in the increased participation rate for non-Whites in the overall workforce. In fact, Hispanics (11.73 percent compared to 8.50 percent RCLF), Blacks (27.02 percent compared to 10.57 percent RCLF), Asians (6.06 percent compared to 4.48 percent RCLF) and Native Hawaiian or Other Pacific Islanders (0.17 percent compared to 0.12 percent RCLF) are participating at rates greater than their RCLF availability rates. American Indian/Alaska Natives (0.82 percent compared to 0.89 percent RCLF) are participating at rates very close to their availability rates. Whites (53.83 percent compared to 74.93 percent) and Two or More Races (0.37 percent compared to 0.51 percent RCLF) are the only groups participating at rates below their RCLF availability rates.

### **Distribution in the Grades**

The distribution of women and non-Whites in Treasury's workforce has been an area of focus for the Department. OCRD has closely monitored the distribution of women and non-Whites in the feeder pools (GS 13 – GS 15) that lead to SES and SES positions. Since FY 2009, Treasury has seen an increased participation rate for women in the GS-13 and GS-15 grades and in SES positions. However, in FY 2018, Treasury saw a slight decreases in the participation rate for women at the GS-14 grade level.

At the GS-13 grade level, the participation rate for women increased by 0.46 percent, from 49.49 percent in FY 2009 to 49.95 percent in FY 2018. At the GS-14 grade level, the participation rate for women decreased by 0.78 percent, from 47.44 percent in FY 2009 to 46.66 percent in FY 2018. At the GS-15 grade level, the participation rate for women increased by 1.57 percent, from 44.65 percent in FY 2009 to 46.22 percent in FY 2018. Furthermore, at the SES level, the participation rate for women increased by

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<sup>2</sup> For purposes of analysis, non-appropriated fund employees are included in the workforce totals as permanent or temporary employees depending on status.



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3.49 percent, from 35.71 percent in FY 2009 to 39.20 percent in FY 2018.

At the GS-13 grade level, the participation rate for Hispanics increased by 1.49 percent, from 6.07 percent in FY 2009 to 7.56 percent in FY 2018. At the GS-14 grade level, the participation rate for Hispanics increased by 1.32 percent, from 4.54 percent in FY 2009 to 5.86 percent in FY 2018. At the GS-15 grade level, the participation rate for Hispanics increased by 1.11 percent, from 3.84 percent in FY 2009 to 4.95 percent in FY 2018. Similarly, at the SES level, the participation rate for Hispanics increased by 0.06 percent, from 3.57 percent in FY 2009 to 3.63 percent in FY 2018.

At the GS-13 grade level, the participation rate for Blacks increased by 2.84 percent, from 18.41 percent in FY 2009 to 21.25 percent in FY 2018. At the GS-14 grade level, the participation rate for Blacks increased by 2.66 percent, from 17.65 percent in FY 2009 to 20.31 percent in FY 2018. At the GS-15 grade level, the participation rate for Blacks increased by 0.79 percent, from 15.34 percent in FY 2009 to 16.14 percent in FY 2018. Likewise, at the SES level, the participation rate for Blacks increased by 1.45 percent, from 10.71 percent in FY 2009 to 12.16 percent in FY 2018.

At the GS-13 grade level, the participation rate for Asians increased by 2.37 percent, from 7.09 percent in FY 2009 to 9.46 percent in FY 2018. At the GS-14 grade level, the participation rate for Asians increased by 4.49 percent, from 5.81 percent in FY 2009 to 10.31 percent in FY 2018. At the GS-15 grade level, the participation rate for Asians increased by 3.82 percent, from 3.95 percent in FY 2009 to 7.77 percent in FY 2018. Again, at the SES level, the participation rate for Asians increased by 0.61 percent, from 3.75 percent in FY 2009 to 4.36 percent in FY 2018.

At the GS-13 grade level, the participation rate for Others<sup>3</sup> increased by 0.08 percent, from 1.11 percent in FY 2009 to 1.19 percent in FY 2018. At the GS-14 grade level, the participation rate for Others increased by 0.19 percent, from 0.98 percent in FY 2009 to 1.17 percent in FY 2018. At the GS-15 grade level, the participation rate for Others increased by 0.34 percent, from 0.57 percent in FY 2009 to 0.91 percent in FY 2018. Additionally, at the SES level, the participation rate for Others increased by 0.91 percent, from 0.36 percent in FY 2009 to 1.36 percent in FY 2018.

Because we have a trend of increased participation for all the non-White groups in the feeder pools and SES positions, it is expected that we would have a trend of decreased participation for Whites. At the GS-13 grade level, the participation rate for Whites decreased by 6.77 percent, from 67.31 percent in FY 2009 to 60.54 percent in FY 2018. At the GS-14 grade level, the participation rate for Whites decreased by -8.67 percent, from 71.02 percent in FY 2009 to 62.36 percent in FY 2018. At the GS-15 grade level, the participation rate for Whites decreased by -6.07 percent, from 76.30 percent in FY 2009 to 70.23 percent in FY 2018. Similarly, at the SES level, the participation rate for Whites decreased by -3.02 percent, from 81.61 percent in FY 2009 to 78.58 percent in FY 2018.

It is important to note that Treasury-wide data aggregates the data from all the bureaus and does not reflect the progress at any particular bureau. In fact, the aggregated data can mask barriers that may still exist within one or more bureaus. Therefore, each bureau must conduct its own detailed barrier analysis into possible glass ceilings, blocked pipelines, and glass walls. OCRD has advised the bureaus that they are required to complete detailed analyses to determine if any EEO groups are facing a potential glass ceiling, blocked pipeline, or glass wall, and based on their findings, to develop plans to eliminate identified barriers.

Additionally, throughout FY 2019, based on the joint EEOC/Office of Personnel Management (OPM) memorandum issued January 18, 2017, Subject: Hispanics in the Federal Workplace, Treasury's bureaus continued to conduct focused barrier analyses on the participation rates for Hispanics within the major occupations and their distribution in the general schedule (GS) grades 12 through SES levels to identify and eradicate any barriers to EEO, consistent with the merit system principles and applicable laws.

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<sup>3</sup> Others includes those groups that are represented at a rate less than one percent of the Treasury workforce (AIAN, NHOPI, and two or More Races).

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During FY 2015/2016, OCRD and the Deputy Assistant Secretary for Human Resources and Chief Human Capital Officer (DASHR CHCO) conducted a review of the diversity of the Department's Senior Executive Service corps and the processes for selecting new executives compared to FY 2005 and FY 2010. The Departmental Executive Resources Board was briefed on the report and agreed to endorse the recommendations in the report. Therefore, in FY 2017, OCRD and DASHR developed the framework to institutionalize the recommendations made in the report in the upcoming year.

However, due to the transition to a new administration, OPM's implementation of the new Identification of Disability Standard Form (SF) 256, as well as many other competing requirements, the activities planned for completion in FY 2017 had to be modified and were completed in FY 2018. Those planned activities around revising the existing applicant flow data tables to distinguish between internal vacancy announcements and those announced as status/open have been completed. Additionally, the Office of Executive Resources issued guidance to the bureau HR offices outlining new policy requirements designed to assist in increasing the diversity of SES applicants and applicants for SES Candidate Development Programs (CDP).

### **Disability Employment Program**

To ensure Treasury was in compliance with the new coding established with the release of OPM's new SF-256 form for tracking PWD and PWTD in its workforce, OCRD worked closely with Enterprise Data Management (EDM) to institute a crosswalk within workforce Analytics, Treasury's data analytics system for analyzing workforce data. Treasury also incorporated data requirements that resulted from changes to Section 501 of the Rehabilitation Act of 1973, which allows agencies to include veterans who are coded as having a 30% or more compensable disability as a PWD. To ensure we eliminated the possibility of double counting veterans as PWD, OCRD worked with EDM to identify the appropriate reporting logic that would automatically include only those veterans with 30 percent compensable disabilities who had also identified themselves as not having a disability.

Additionally, from August through October 2017, OCRD conducted a Treasury-wide resurvey campaign, asking current employees to access their personnel data through HR Connect, Treasury's personnel data system, and update their disability status using the revised SF-256 form.

As a result of the implementation of the new coding in OPM's revised SF-256 and the Department's resurvey efforts, Treasury had a significant increase in the participation rates for both PWD and PWTD in its permanent workforce. In its FY 2009 MD-715 Report submitted to EEOC, Treasury reported a permanent workforce participation rate of 8.82 percent for PWD and 1.71 percent for PWTD. However at the end of FY 2018, Treasury is pleased to note that we have exceeded the new FY 2018 goals of a 12 percent participation rate for PWD (12.39 percent) and the goal of 2 percent for PWTD (3.57 percent).

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Many of Treasury bureaus have also either met or exceeded the new goals:

**FY 2018 Disability Participation Rates By Bureau**

Bureau	Total	PWD #	PWD %	PWTD #	PWTD %
BEP	1730	259	14.97%	35	2.02%
DO	1788	169	9.45%	35	1.96%
FINCEN	286	51	17.83%	11	3.85%
FS	3324	707	21.27%	138	4.15%
IRS	75269	9125	12.12%	2835	3.77%
IRS-CC	1936	166	8.57%	42	2.17%
MINT	1518	307	20.22%	57	3.75%
OCC	3823	337	8.82%	77	2.01%
OIG	163	30	18.40%	9	5.52%
SIGT	101	13	12.87%	3	2.97%
TIGTA	751	69	9.19%	5	0.67%
TTB	490	68	13.88%	11	2.24%
<b>Total</b>	<b>91179</b>	<b>11301</b>	<b>12.39%</b>	<b>3258</b>	<b>3.57%</b>

The new FY 2018 goals for the employment of PWD and PWTD include achieving a 12 percent participation rate for PWD at both the GS-10 and below and at the GS-11 and above, as well as the goal to achieve a 2 percent participation rate for PWTD in both groups. We are pleased to note that Treasury's current participation rates for PWD (14.39%) and PWTD (4.51%) at the grades GS-10 and below exceed the new goals of 12 percent and 2 percent.

The participation rate for PWTD (2.68%) currently exceeds the new goal of a 2 percent participation rate at the GS-11 and above grades levels. However, the participation rates for PWD (10.36%) at the GS-11 and above is slightly below the 12 percent goal, indicating there is still work to be done.

In FY 2018, OCRD continued to conduct its "Be a Champion Roadshow" initiative. The Department considers this initiative to be a best practice for encouraging the hiring of veterans and PWD in high visibility positions. The Department's Disability Program Manager and the Veterans Employment Coordinator conducted a series of Roadshows at Treasury's bureaus, providing face-to-face coaching to Treasury's managers and other key personnel (bureau Veteran Employment Representatives, Disability Program Managers, and Selective Placement Coordinators). The Roadshows educated Treasury's key stakeholders on the many benefits of hiring veterans and PWD, including utilizing the non-competitive hire request process for veterans and Schedule A candidates. In FY 2018, OCRD conducted roadshows for managers and supervisors at DO and FS.

OCRD also provided Treasury and its bureaus EEO staff and Reasonable Accommodation/Disability Program Coordinators with training on Reasonable Accommodation Under the ADA and Rehabilitation Act: What you need to know. The session focused on practical application of the ADA and its amendments and how Agencies must and should respond to requests for accommodations. The training also covered current trends and mistakes to avoid during the reasonable accommodation process.

During FY 2018, Treasury utilized OPM's Talent Portal located on USAJobs as a resume mining database for PWD and Veterans. Using the Talent Portal provided Treasury and its bureaus' hiring managers' access to resumes of qualified candidates with disabilities and veterans. This tool continues to assist Treasury to meet its participation rate goals and encourages the use of special hiring authorities,

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such as Schedule A and the hiring authority for veterans with 30% or more compensable disability.

In FY 2018, OCRD finalized and posted its PAS Policy and procedures to our internal and external website. The external link is [https://www.treasury.gov/about/organizational-structure/offices/Mgt/Pages/eeo\\_programs.aspx](https://www.treasury.gov/about/organizational-structure/offices/Mgt/Pages/eeo_programs.aspx). OCRD also finalized a personal assistance service provider position description to facilitate their hiring.

OCRD also includes a Disability Awareness section in its quarterly newsletter, the OCRD Advisory. Through the newsletter and other sources, the Department ensures that hiring managers are informed of and encouraged to use various resources that provide assistance with the employment of qualified people with disabilities, e.g., CAREERS and the disABLED, OPM's Bender Consulting Services, the Division of Rehabilitation Services (DORS), and State Vocational Rehabilitation Agencies.

Based on feedback from Treasury's FY 2017 Affirmative Action Plan, OCRD required all of its bureaus to review and update as required their existing reasonable accommodations (RA) policies and procedures. Once the bureaus have completed their updates to the existing RA policies and procedures, submitted them to OCRD for review/comment, OCRD will submit them to the EEOC for review and approval. To date, OCRD has submitted to EEOC the revised bureau RA policies and procedures for BEP, FS, DO, IRS, Mint, OCC and TIGTA. OCRD is working with FinCEN, IRS-CC, OIG, SIGTARP, and TTB to finalize their revisions to their RA Policies and procedures. The bureaus have been directed that once a bureau's RA policy and procedures have been approved by EEOC, the bureau is to post the approved RA policy and procedures to its external and internal website.

## **Part E.4 - Executive Summary: Accomplishments**

### **Accomplishments**

The Department is proud of its accomplishments towards maintaining a model EEO program in FY 2018. The accomplishments below outline our many successes throughout the reporting period:

- In collaboration with DASHR CHCO, completed the implementation plan for recommended strategies identified in the Treasury SES barrier analysis.
- Established and posted Treasury-wide Personal Assistant Services (PAS) policy and procedures to the Department's external and internal websites.
- Created a personal assistance service provider position description to facilitate hiring.
- Conducted multiple training sessions with bureau MD-715 preparers on the preparation of the new MD-715 Version 2 PARTS A-J; ensuring a smooth transition into EEOC's new reporting requirements for the FY 2018 reporting period.
- Conducted a two-day barrier analysis training workshop for representatives of the Mint EEO staff from each of its five facilities. The workshop provided instruction on use of the MD-715 workforce data tables, the identification of triggers, associating like triggers to determine the direction of the barrier analysis process, conducting root cause analysis to identify potential barriers, as well as how to prepare required plans to eliminate any identified barriers.
- OCRD partnered with Enterprise Data Management, CareerConnector, and Monster to create new workforce data tables required by the implementation of the EEOC's MD-715 Version 2, which will be fully implemented in the FY 2019 reporting period.
- Collaborated with Monster and CareerConnector to establish and implement new reporting methodology for capturing applicant flow data, including with respect to applicants who were referred and interviewed, as well as data on bureau formal career development programs through which competitively selected candidates become eligible for promotion upon completion.
- Published quarterly EEO and Veterans newsletters which provided Treasury's EEO practitioners, managers, supervisors, and employees with information on relevant complaint issues, workforce statistics and important upcoming agency events/activities.
- Conducted two "Be a Champion Roadshows" with FS and DO managers and hiring officials to educate them on the use of special hiring authorities to increase the participation rate for PWTD and disabled veterans

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- Participated in the 25th Annual Federal Inter-Agency Observance to Honor the Days of Remembrance.
- Released the Secretary's updated Equal Opportunity and Diversity Statement for FY 2018.
- Launched two new Department-wide Employee Resource Groups (ERG): Adelante (Hispanic) and LEO (Law Enforcement Officers).
- Expanded official leadership for existing Prism (Lesbian, Gay, Bisexual, Transitioning, and Questioning (LGBTQ)) and VERG (Veterans) ERG groups.
- Supported all four ERG's through regular meetings, training events, and other outreach opportunities.
- Designed and presented LGBTQ Cultural Competency training for 543 employees across IRS, FS and DO.
- Provided assistance to four employees undergoing gender transition; notified employees through intersex announcements across the Department.
- Issued seven Observance newsletters; shared inclusion opportunities associated with special emphasis groups and observances held throughout Treasury.
- Partnered with bureau Diversity and Inclusion Liaisons to review bureau specific Federal Employee Viewpoint Survey data and updated their New IQ plans as part of the Inclusive Diversity Strategic Plan for 2018.
- Conducted micro aggression training sessions for the Philadelphia Mint leadership and employees,
- Exceeded EEOC's goal that 12 percent of all new permanent hires be PWD (12.39 percent) and the sub goal that 2 percent of those hires be PWTD (3.57 percent).
- Provided eight hours of refresher training to Treasury Shared Neutral's current mediator cadre members.
- As part of the Department's Conflict Resolution Week, provided a lunch and learn training session titled, *Understanding the Civility Spectrum in the Workplace*. The Session discussed the impact of workplace culture on productivity and collaboration, how to recognize and diminish incivility in the workplace, and what to do to promote a culture of courtesy, respect, and collaboration.
- Completed a total of 259 mediations and successfully resolved 99 (38%) of the complaints mediated.

## **Part E.5 - Executive Summary: Planned Activities**

### **Planned Activities/Conclusion**

The Office of Civil Rights and Diversity's FY 2018 MD-715 Report outlines the many successes in our equal opportunity programs and activities. The Department of the Treasury is proud of its accomplishments in attracting and retaining an increasingly diverse workforce. However, we realize there is always more to be done to increase workforce diversity, specifically within our mission critical occupations, in senior pay levels and feeder groups, and to improve the hiring and promotion rates of individuals with targeted disabilities. As we move forward into the next fiscal year, we will maintain our focus on developing plans to ensure Treasury and its bureaus have the broadest group of diverse, well-qualified talent from which to recruit.

OCRD's FY 2019 planned activities include the following:

- Reestablish the bureau audit program, reviewing all phases of at least two bureaus' EEO programs, including diversity and inclusion, civil rights, and EEO complaint process. OCRD is scheduled to audit FinCEN, Mint's and IRS's EEO programs.
- Work with Enterprise Data Management and Monster Analytics to improve reporting capability of workforce analytics, resulting in improved data analysis capabilities around workforce demographics, as shown by meeting new EEOC reporting requirements. Train 80% of the bureaus in data analysis capabilities that will enable bureaus to provide data on demand to leadership.
- Perform analysis of off-the-shelf commercial programs designed to improve reporting on the

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reasonable accommodation process. Partner with the Chief Information Officer, Procurement, and Budget to plan for acquisition and roll out in FY 2020.

- Hold quarterly meetings with the Bureau EEO Officers to discuss EEO emerging issues, best practices and concerns, and the various EEO programs and activities being conducted by the Bureau EEO offices.
- Promote the use of the ADR process to resolve EEO disputes. Evaluate the effectiveness of ADR and monitor use findings to make improvements.
- Perform continuous improvement processes, including best practice review on the EEO complaint process, to maintain/improve excellent results in timely investigations and decisions. Achieve at least a 90% timeliness rate for investigations and decisions.
- Finalize Blanket Purchase Agreement (BPA) for personal assistance services for all bureaus to use, enabling Treasury to meet EEOC expectations regarding personal assistance services for severely disabled employees.
- Closely monitor the Treasury Complaint Management System to ensure continued improvement in the timely production of final agency decisions and EEO investigations.
- Update the Department's Sexual Harassment brochure and make available to our employees through OCRD's internal website.
- Contract with an additional EEO investigative services provider for back up and special circumstance services.
- Explore re-competing the contract for IComplaints services to provide superior technical support for processing functions and document storage.
- Ensure Treasury Shared Neutral (TSN) mediator trainees reach certification status and become active cadre members.
- As part of Treasury's FY 2019 Annual Dispute Prevention Program, coordinate and conduct a Dispute Prevention training session that emphasizes the benefits of ADR.
- Provide one refresher training for current TSN mediators.
- Transition the TSN administrator functions to Bureau of Engraving and Printing for FY 2020 and FY 2021.
- Continue to monitor bureau plans to identify the existence of barriers to the employment of any group and strategies to eliminate any barriers that are uncovered.
- Conduct training sessions with bureau MD-715 preparers on the use of the new MD-715 V2 workforce data tables to be implemented as part of the FY 2019 reporting cycle.
- Conduct the "Be a Champion" Roadshow for Treasury leadership.
- Update the Department's "Be a Champion" leadership Message, which encourages managers and hiring officials to use special hiring authorities to increase the participation rate for qualified PWTD and disabled veterans.
- Promote the use of Operation Warfighter Internships as a tool to increase the hiring of veterans with disabilities.

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

I, **Mariam Harvey, Director, Office of Civil Rights and Diversity, 260, ES** am the

(Insert name above)

(Insert official  
title/series/grade above)

Principal EEO  
Director/Official for

**Department of the Treasury**

(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, Sex 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.



(Mariam Harvey, Director, Office of Civil Rights and  
Diversity)

**4/25/19**

Signature of Principal EEO Director/Official

Date

Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with  
EEO MD-715.



(David Eisner, Assistant Secretary for Management)

**5/30/19**

Signature of Agency Head or Agency Head Designee

Date



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## **715 - PART G**

### **Agency Self-Assessment Checklist**

The Part G Self-Assessment Checklist is a series of questions designed to provide federal agencies with an effective means for conducting the annual self-assessment required in Part F of MD-715. This self-assessment permits EEO Directors to recognize, and to highlight for their senior staff, deficiencies in their EEO program that the agency must address to comply with MD-715's requirements. Nothing in Part G prevents agencies from establishing additional practices that exceed the requirements set forth in this checklist.

All agencies will be required to submit Part G to EEOC. Although agencies need not submit documentation to support their Part G responses, they must maintain such documentation on file and make it available to EEOC upon request.

The Part G checklist is organized to track the MD-715 essential elements. As a result, a single substantive matter may appear in several different sections, but in different contexts. For example, questions about establishing an anti-harassment policy fall within Element C (Management and Program Accountability), while questions about providing training under the anti-harassment policy are found in Element A (Demonstrated Commitment from Agency Leadership).





For each MD-715 essential element, the Part G checklist provides a series of "compliance indicators." Each compliance indicator, in turn, contains a series of "yes/no" questions, called "measures." To the right of the measures, there are two columns, one for the agency to answer the measure with "Yes", "No", or "NA;" and the second column for the agency to provide "comments", if necessary. Agencies should briefly explain any "N/A" answer in the comments. For example, many of the sub-component agencies are not responsible for issuing final agency decisions (FADs) in the EEO complaint process, so it may answer questions about FAD timeliness with "NA" and explain in the comments column that the parent agency drafts all FADs.

A "No" response to any measure in Part G is a program deficiency. For each such "No" response, an agency will be required in Part H to identify a plan for correcting the identified deficiency. If one or more sub-components answer "No" to a particular question, the agency-wide/parent agency's report should also include that "No" response.

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**Agency Self-Assessment Checklist**

 <b>Compliance Indicator</b>  <b>Measures</b>	<b>A.1 – The agency issues an effective, up-to-date EEO policy statement.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>A.1.a</b>	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "yes", please provide the annual issuance date in the comments column. [see MD-715, II(A)]	Yes	Issued 04/13/2018
<b>A.1.b</b>	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>A.2 – The agency has communicated EEO policies and procedures to all employees.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>A.2.a</b>	Does the agency disseminate the following policies and procedures to all employees:		
<b>A.2.a.1</b>	Anti-harassment policy? [see MD 715, II(A)]	Yes	
<b>A.2.a.2</b>	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	Yes	
<b>A.2.b</b>	Does the agency prominently post the following information throughout the workplace and on its public website:	Yes	
<b>A.2.b.1</b>	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]	Yes	Treasury Displays the name and contact information for bureau EEO officers. Bureau's display the specific bureau contact information. However, at each Treasury bureau, counseling is centralized. Therefore, bureaus post general contact information of who to contact to initiate a complaint.





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<b>A.2.b.2</b>	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	Yes	
<b>A.2.b.3</b>	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	Yes	<a href="https://www.treasury.gov/about/organizational-structure/offices/Mgt/Documents/FY%202012%20Interim%20Reasonable%20Accommodation%20Policy%20and%20Procedures.pdf">https://www.treasury.gov/about/organizational-structure/offices/Mgt/Documents/FY%202012%20Interim%20Reasonable%20Accommodation%20Policy%20and%20Procedures.pdf</a>
<b>A.2.c</b>	Does the agency inform its employees about the following topics:		
<b>A.2.c.1</b>	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often.	Yes	It is posted on both the internal and external websites, and on informational posters posted in common areas/breakrooms; is part of new employee and manager orientation sessions; and every two years is part of the No FEAR Act training.
<b>A.2.c.2</b>	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Yes	It is posted on both the internal and external websites, and is part of new employee and manager orientation sessions. Additionally, Treasury conducts an annual Conflict Resolution week which highlights the importance of ADR and conflict resolution.
<b>A.2.c.3</b>	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Yes	It is posted on both the internal and external websites, and included during new employee and manager orientation sessions and every two years as part of the No FEAR Act training.
<b>A.2.c.4</b>	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.	Yes	It is posted on both the internal and external websites, and included during new employee and manager orientation sessions, every two years as part of the No FEAR Act training, and annually as part of Prevention of Sexual Harassment (POSH) training
<b>A.2.c.5</b>	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If “yes”, please provide how often.		It is included in new employee and manager orientation sessions, as part of the No FEAR Act training conducted every 2 years, and annual POSH training.



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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>A.3 – The agency assesses and ensures EEO principles are part of its culture.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>  <b>New Compliance Indicator</b>
<b>A.3.a</b>	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.	Yes	Bureaus identified the Annual Rittenhouse Award, performance awards (mandatory diversity and inclusion (D&I) and supervisory performance goals), monetary and non-monetary group and individual spot awards.
<b>A.3.b</b>	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Yes	
<p style="text-align: center;"><b>Essential Element B: INTEGRATION OF EEO INTO THE AGENCY’S STRATEGIC MISSION</b>  <b>This element requires that the agency’s EEO programs are structured to maintain a workplace that is free from discrimination and support the agency’s strategic mission.</b></p>			
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.1.a</b>	Is the agency head the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]	No	
<b>B.1.a.1</b>	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If “yes,” please provide the title of the agency head designee in the comments.	Yes	OCRD’s Director reports to the Assistant Secretary for Management.
<b>B.1.a.2</b>	Does the agency’s organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes	
<b>B.1.b</b>	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency’s EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes	





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<b>B.1.c</b>	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comments column.	Yes	OCRD presented the FY 2017 State of the Agency (SOA) briefing to Agency Head on 04/30/2018. SOA for the FY 2018 reporting period will be conducted prior to the submission of the FY 2018 MD-715 report to EEOC.
<b>B.1.d</b>	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.2 – The EEO Director controls all aspects of the EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments New Compliance Indicator</b>
<b>B.2.a</b>	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]	Yes	
<b>B.2.b</b>	Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)]	Yes	
<b>B.2.c</b>	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes	
<b>B.2.d</b>	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes	
<b>B.2.e</b>	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Yes	
<b>B.2.f</b>	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]	Yes	

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<b>B.2.g</b>	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2) and (c)(3)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.3.a</b>	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]	Yes	
<b>B.3.b</b>	Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.	Yes	<b>Treasury's Strategic Goal 5.1.C</b> Improve diversity and engagement through transparency, fairness, and inclusion.
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.4.a</b>	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:		
<b>B.4.a.1</b>	to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	Yes	
<b>B.4.a.2</b>	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	Yes	
<b>B.4.a.3</b>	to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	Yes	

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<b>B.4.a.4</b>	to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	Yes	
<b>B.4.a.5</b>	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]	Yes	
<b>B.4.a.6</b>	to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	Yes	
<b>B.4.a.7</b>	to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	Yes	
<b>B.4.a.8</b>	to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]	Yes	
<b>B.4.a.9</b>	to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes	
<b>B.4.a.10</b>	to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]	Yes	
<b>B.4.a.11</b>	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Yes	
<b>B.4.b</b>	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	Yes	
<b>B.4.c</b>	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes	
<b>B.4.d</b>	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?	Yes	





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<b>B.4.e</b>	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments New Indicator</b>
<b>B.5.a</b>	Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:		
<b>B.5.a.1</b>	EEO Complaint Process? [see MD-715(II)(B)]	Yes	
<b>B.5.a.2</b>	Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]	Yes	
<b>B.5.a.3</b>	Anti-Harassment Policy? [see MD-715(II)(B)]	Yes	
<b>B.5.a.4</b>	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	Yes	
<b>B.5.a.5</b>	ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.6 – The agency involves managers in the implementation of its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments New Indicator</b>
<b>B.6.a</b>	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	Yes	
<b>B.6.b</b>	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	Yes	
<b>B.6.c</b>	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	Yes	



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<b>B.6.d</b>	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR § 1614.102(a)(5)]	Yes	
<p style="text-align: center;"><b>Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY</b></p> <p style="text-align: center;"><b>This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency's EEO Program and Plan.</b></p>			
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.1 – The agency conducts regular internal audits of its component and field offices.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.1.a</b>	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	Yes	Annually, before the submission of the bureau MD-715 reports to EEOC, OCRD evaluates their submissions and provides feedback on the status of deficiencies and implementation of planned activities to eliminate deficiencies, and recommends additional measures required to eliminate noted deficiencies. Additionally, OCRD will be conducting an audit review of Mint (May - June), IRS (July - September), and FinCEN (September) EEO Programs during FY 2019.
<b>C.1.b</b>	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	Yes	Annually, before the submission of the bureau MD-715 reports to EEOC, OCRD evaluates their submissions and provides feedback on the status of barrier analysis and implementation of planned activities to eliminate barriers, and recommends additional measures required to identify and eliminate noted barriers. Additionally, OCRD will be conducting an audit review of Mint (May - June), IRS (July - September), and FinCEN (September) EEO Programs during FY 2019.

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<b>C.1.c</b>	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.2 – The agency has established procedures to prevent all forms of EEO discrimination.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>  <b>New Indicator</b>
<b>C.2.a</b>	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	
<b>C.2.a.1</b>	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes	
<b>C.2.a.2</b>	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	Yes	
<b>C.2.a.3</b>	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	
<b>C.2.a.4</b>	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [see Enforcement Guidance, V.C.]	Yes	



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<b>C.2.a.5</b>	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <i>Complainant v. Dep't of Veterans Affairs</i> , EEOC Appeal No. 0120123232 (May 21, 2015); <i>Complainant v. Dep't of Defense (Defense Commissary Agency)</i> , EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.	Yes	
<b>C.2.a.6</b>	Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR 1614.203(d)(2)]	Yes	
<b>C.2.b</b>	Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR 1614.203(d)(3)]	No	All Treasury bureaus' reasonable accommodation (RA) policies have been updated and submitted to OCRD for review and approval. As the revised bureau RA policies and procedures are approved by OCRD, they will be submitted to EEOC for review and approval. In the interim, Treasury has directed bureaus to post interim policies and procedures pending EEOC's approval. Once approved, bureaus will replace interim policy and procedures with the EEOC approved RA policies and procedures.
<b>C.2.b.1</b>	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]	Yes	
<b>C.2.b.2</b>	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	Yes	
<b>C.2.b.3</b>	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]	Yes	



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<b>C.2.b.4</b>	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]	Yes	
<b>C.2.b.5</b>	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests in the comments column.	No	IRS reported that it timely processed 31% of it requests.
<b>C.2.c</b>	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	Yes	
<b>C.2.c.1</b>	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.	Yes	<a href="https://www.treasury.gov/about/organizational-structure/offices/Mgt/Documents/PAS-Policy-and-Procedures-as-OCT-2018.pdf">https://www.treasury.gov/about/organizational-structure/offices/Mgt/Documents/PAS-Policy-and-Procedures-as-OCT-2018.pdf</a>
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>  <b>New Indicator</b>
<b>C.3.a</b>	Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	Yes	
<b>C.3.b</b>	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:		
<b>C.3.b.1</b>	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.]	Yes	
<b>C.3.b.2</b>	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	Yes	
<b>C.3.b.3</b>	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	Yes	



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<b>C.3.b.4</b>	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	Yes	
<b>C.3.b.5</b>	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	Yes	
<b>C.3.b.6</b>	Provide disability accommodations when such accommodations do not cause an undue hardship? [ see 29 CFR §1614.102(a)(8)]	Yes	
<b>C.3.b.7</b>	Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]	Yes	
<b>C.3.b.8</b>	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]	Yes	
<b>C.3.b.9</b>	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	Yes	
<b>C.3.c</b>	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	Yes	
<b>C.3.d</b>	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.4.a</b>	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	Yes	

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<b>C.4.b</b>	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	Yes	
<b>C.4.c</b>	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	Yes	
<b>C.4.d</b>	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	Yes	
<b>C.4.e</b>	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:		
<b>C.4.e.1</b>	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	Yes	
<b>C.4.e.2</b>	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	Yes	
<b>C.4.e.3</b>	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Yes	
<b>C.4.e.4</b>	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	Yes	
<b>C.4.e.5</b>	Assist in preparing the MD-715 report? [see MD-715, II(C)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.5.a</b>	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)]	Yes	





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<b>C.5.b</b>	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If "yes", please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Yes	Five (three from FAD's and two from civil court cases)
<b>C.5.c</b>	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [see MD-715, II(C)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.6 – The EEO office advises managers/supervisors on EEO matters.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.6.a</b>	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If "yes", please identify the frequency of the EEO updates in the comments column.	Yes	The OCRD Director updates the ASM as issues arise. The OCRD Director also participates in the ASM's weekly staff meetings. Additionally, diversity dashboards on Treasury and individual bureau workforce demographics are provided to the ASM on at least an annual basis.
<b>C.6.b</b>	Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I]	Yes	
<b>Essential Element D: PROACTIVE PREVENTION</b>			
<b>This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.1.a</b>	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	Yes	





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<b>D.1.b</b>	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I]	Yes	
<b>D.1.c</b>	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b> <b>New Indicator</b>
<b>D.2.a</b>	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	Yes	
<b>D.2.b</b>	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	Yes	
<b>D.2.c</b>	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	Yes	
<b>D.2.d</b>	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] If “yes”, please identify the data sources in the comments column.	Yes	Complaint data through iComplaint; workforce data and exit survey data through Workforce and Monster Analytics. Information regarding Unions, reasonable accommodations, anti-harassment, as well as any other required information is provided by bureau EEO and HR personnel upon request.



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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.3 – The agency establishes appropriate action plans to remove identified barriers.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>  <b>New Indicator</b>
<b>D.3.a.</b>	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	Yes	
<b>D.3.b</b>	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	Yes	
<b>D.3.c</b>	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>  <b>New Indicator</b>
<b>D.4.a</b>	Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d)(4)] Please provide the internet address in the comments.	Yes	<a href="https://www.treasury.gov/about/organizational-structure/offices/Mgt/Pages/Affirmative-Action-Plan.aspx">https://www.treasury.gov/about/organizational-structure/offices/Mgt/Pages/Affirmative-Action-Plan.aspx</a>
<b>D.4.b</b>	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]	Yes	
<b>D.4.c</b>	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]	Yes	
<b>D.4.d</b>	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)]	Yes	



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<b>Essential Element E: EFFICIENCY</b> <b>This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency's EEO programs and an efficient and fair dispute resolution process.</b>			
 <b>Compliance Indicator</b>	<b>E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
 <b>Measures</b>			
<b>E.1.a</b>	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Yes	
<b>E.1.b</b>	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Yes	
<b>E.1.c</b>	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(l)?	Yes	
<b>E.1.d</b>	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(l)? If so, please provide the average processing time in the comments.	Yes	Treasury benchmark is to issue acceptance or dismissal letter no more than 30 days from file date. FY 18 Averages: Acceptance letters were issued in 15 days. Dismissal letters were issued in 22 days.
<b>E.1.e</b>	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	Yes	
<b>E.1.f</b>	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	Yes	
<b>E.1.g</b>	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	Yes	
<b>E.1.h</b>	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	Yes	
<b>E.1.i</b>	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?	Yes	





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<b>E.1.j</b>	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comments column.	Yes	OCRD conducts bi-weekly meetings to review current stats of all cases and discusses any instance where a case may be untimely and the reason for the untimeliness and ensures there are no systemic problems in the process.
<b>E.1.k</b>	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes	
<b>E.1.l</b>	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.2 – The agency has a neutral EEO process.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments Revised Indicator</b>
<b>E.2.a</b>	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)]	Yes	
<b>E.2.b</b>	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If "yes", please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.	Yes	Legal Sufficiency reviews are completed in Treasury General Counsel Office by an attorney who is not representing the agency in the particular matter.
<b>E.2.c</b>	If the EEO office relies on the agency's defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]	Yes	
<b>E.2.d</b>	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	Yes	
<b>E.2.e</b>	If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)]	Yes	





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 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
	<b>E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.</b>		
<b>E.3.a</b>	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	Yes	
<b>E.3.b</b>	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Yes	
<b>E.3.c</b>	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	Yes	
<b>E.3.d</b>	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes	
<b>E.3.e</b>	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Yes	
<b>E.3.f</b>	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.4.a</b>	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:		
<b>E.4.a.1</b>	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	Yes	
<b>E.4.a.2</b>	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	Yes	
<b>E.4.a.3</b>	Recruitment activities? [see MD-715, II(E)]	Yes	
<b>E.4.a.4</b>	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	Yes	
<b>E.4.a.5</b>	The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]	Yes	

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<b>E.4.a.6</b>	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	Yes	
<b>E.4.b</b>	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.5.a</b>	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	EEOC Annual reports, Complaint data, RA processing, exit survey results, FEVS results, Analysis of Workforce data by ERI, gender, disability, grades, occupation, hires, separations, awards, etc.
<b>E.5.b</b>	Does the agency review other agencies’ best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	Development of Workforce Analytics, Treasury’s automated data tool; Treasury-wide exit survey and analysis tool; Veteran and Disability Program “Be a Champion Roadshow”; use of internship program to establish a pipeline of diverse candidates for future employment; Veteran and Disability resume data base.
<b>E.5.c</b>	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Yes	
<b>Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE</b> <b>This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>F.1.a</b>	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	Yes	





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<b>F.1.b</b>	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	Yes	
<b>F.1.c</b>	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes	
<b>F.1.d</b>	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes	
<b>F.1.e</b>	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>  Indicator moved from E-III Revised
<b>F.2.a</b>	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	Yes	
<b>F.2.a.1</b>	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]	Yes	
<b>F.2.a.2</b>	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	Yes	
<b>F.2.a.3</b>	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR §1614.403(e)]	Yes	
<b>F.2.a.4</b>	Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes	

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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.3 - The agency reports to EEOC its program efforts and accomplishments.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>F.3.a</b>	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	Yes	
<b>F.3.b</b>	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	Yes	

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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
C.2.b.5	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation (RA) procedures? [see MD-715, II(C)].  IRS reported that it processed 31% of RA requests within the time frame set forth in its revised RA procedures.

**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)
10/01/2018	Ensure timely processing of IRS reasonable accommodation requests.	9/30/2019		

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
Director, OCRD	Mariam Harvey	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)
9/30/2019	Monitor implementation of IRS's planned activities to eliminate untimely processing of RA requests.	Yes		

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**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
<b>2018</b>	N/A

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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
C.2.b	<p>Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR 1614.203(d)(3)]</p> <p>As part of EEOC's feedback on Treasury's and its bureaus' FY 2017 affirmative action plans, EEOC identified that Treasury and some of its bureaus RA policies and procedures had not been reviewed and approved based on changes required by the updated 29 CFR 1614.203.</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)
10/01/2018	Ensure Treasury's and its bureaus' RA policies and procedures are in compliance with EEOC requirements and submitted to EEOC for final approval.	9/30/2019		

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
Director, OCRD	Mariam Harvey	Yes

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### Planned Activities Toward Completion of Objective

<b>Target Date</b> (mm/dd/yyyy)	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing?</b> (Yes or No)	<b>Modified Date</b> (mm/dd/yyyy)	<b>Completion Date</b> (mm/dd/yyyy)
08/30/2018	Require bureaus to submit updated RA policies and procedures to OCRD for review and comment.	Yes		08/24/2018
09/07/2018	OCRD will review bureau RA policies and procedures and make any recommended changes. Those RA policies and procedure requiring change will be returned to the appropriate bureau for correct.	Yes		09/07/2018
01/30/2018	Once bureau RA policies and procedures are approved by OCRD, they will be submitted to EEOC for review and final approval.	Yes		
03/30/2018	Pending EEOC's final approval of bureau RA policies and procedures, Bureaus will post interim RA policies and procedures to internal and external websites.	Yes		
03/30/2019	Once RA policies and procedures are approved by EEOC, bureaus post their EEOC approved RA policies and procedure to their internal and external websites.	Yes		

### Report of Accomplishments

<b>Fiscal Year</b>	<b>Accomplishments</b>
<b>2018</b>	To date, OCRD has submitted to EEOC the revised bureau RA policies and procedures for BEP, FS, DO, IRS, Mint, OCC, and TIGTA. Of those submitted to EEOC, EEOC has approved OCC's RA policies and procedures. OCRD is currently working with FinCEN, IRS-CC, OIG, SIGTARP, and TTB to finalize their revisions to their RA Policies and procedures.

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**DEPARTMENT OF THE TREASURY ANNUAL EEO PROGRAM STATUS REPORT**

**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
EEOC Feedback	A4-1	<p>In August FY 2015, Treasury received a feedback letter from the EEOC based on the Department's and its bureaus' responses to the EEOC's Federal Complement Plan (FCP) Questionnaire and a June 12, 2015 follow-up meeting with EEOC staff members. The letter indicated that the Department had not identified any triggers involving EEO groups in its SES positions or a barrier analysis in PART I as part of its FY 2014 MD-715 reporting, even though its bureaus had indicated triggers for several EEO groups in their responses to the FCP.</p> <p>A review of bureau Management Directive (MD) 715 Reports indicated the presence of potential barriers for women and some minorities in reaching SES positions as well as in the feeder pools (GS-15 and equivalent positions) that can lead to SES positions.</p>

**EEO Group(s) Affected by Trigger**

EEO Group	Affected by Trigger? (Yes or No)
All Men	No
All Women	Yes
Hispanic or Latino Males	Yes
Hispanic or Latino Females	Yes
White Males	No
White Females	Yes
Black or African American Males	Yes
Black or African American Females	Yes
Asian Males	No

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<b>EEO Group</b>	<b>Affected by Trigger? (Yes or No)</b>
Asian Females	Yes
Native Hawaiian or Other Pacific Islander Males	No
Native Hawaiian or Other Pacific Islander Females	No
American Indian or Alaska Native Males	Yes
American Indian or Alaska Native Females	No
Two or More Races Males	Yes
Two or More Races Females	Yes

### **Barrier Analysis Process**

<b>Sources of Data</b>	<b>Source Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	Reviewed bureau specific workforce data by race, ethnicity, and gender, for (1) career SES positions and OCC equivalent NB 8-9 positions at the end of FY 2014 compared to FY 2010 and FY 2005 and (2) the FY 2014 SES feeder pool positions (i.e., GS-15 and OCC equivalents) compared to FY 2010 and FY 2005, and relevant applicant flow data.
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	No	
Focus Groups	No	
Interviews	Yes	Reviewed bureau HR/EEO responses to the following questions: 1. How are SES vacancies announced? 2. Are all SES announcements processed through CareerConnector/Monster? 3. Are all SES announcements Public? Or Status? If not, can they be restricted to



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<b>Sources of Data</b>	<b>Source Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
		internal? 4. What is the required length of time for posting SES vacancies? 5. How do you recruit for SES vacancies? 6. Do you conduct targeted recruitment and outreach? And if so, what does that mean/look like? (for any ERI, gender or occupational series) 7. Is the application process resume only? Or does it allow for ECQ's? 8. What is the selection process? (Be specific) 9. How do you rate/rank? 10. If you use a selection panel, is there a policy pertaining to the diversity of the panel? 11. If there is a policy pertaining to the diversity of the panel, how do you enforce the policy? 12. Who determines the criteria for the vacancy announcement? 13. Are your interviewers trained in interviewing techniques? 14. Are your interviewers trained in unconscious bias? 15. Provide a list of the occupations that feed into your SES ranks.
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	Yes	Reviewed bureau policies, MD-715 reports, and bureau SES Career Development Program (CDP) participation and application processes.

**Status of Barrier Analysis Process**

<b>Barrier Analysis Process Completed? (Yes or No)</b>	<b>Barrier(s) Identified? (Yes or No)</b>
Yes	Yes

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## Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
The working group found that the Department as a whole has made significant strides to increase diversity within the SES and SES feeder pool for both women and minorities. However, for those bureaus or occupations with 10 or fewer SES positions, the limited number of positions and infrequency with which these positions turn over will impact the ability to make progress.
For those bureaus with a significant number of SES, we found that with the exception of IRS and OCC, limited or no outreach is being conducted. The working group found that most bureaus are either simply posting the positions on USAJobs or seeking qualified candidates from existing employees who have successfully completed a SES CDP program. IRS and OCC reported taking additional steps and posting to sites such as Twitter, Facebook, and LinkedIn, or to occupation-focused organizations.
In those cases where the bureau seeks to fill vacant SES positions with an existing internal SES CDP graduate, diversity by ERI and gender depends on the bureau's existing diversity. In most cases, the diversity is not there; therefore, little change in the overall demographics of the SES cadre can be expected.
In reviewing Executive Resources Board (ERB) panel procedures, we found that none of the bureaus have an official policy to ensure that the ERB panels are diverse, nor are there standard processes to ensure panel diversity. We also noted that none of the bureaus require ERB panel members to complete mandatory interviewing or unconscious bias training.
Overall, it was reported that bureaus post vacancies for SES positions for 14 days; however, vacancies can be posted for up to 30 days. FS reported that when it posts SES vacancies internally, it may do so for only five days. Posting a vacancy announcement for 14 days or fewer does not necessarily give the agency the broadest pool of candidates, nor necessarily give candidates ample time to find out about the vacancy, prepare an application package, and apply before it closes.

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

<b>Objective</b>	<b>Date Initiated (mm/dd/yyyy)</b>	<b>Target Date (mm/dd/yyyy)</b>	<b>Sufficient Funding &amp; Staffing? (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Date Completed (mm/dd/yyyy)</b>
Enhance or establish appropriate Treasury-wide policy and procedures to ensure equal access to opportunity for advancement to SES, participation in SES CDP programs and eliminate potential for unconscious bias in the selection process.	09/30/2016	09/20/2017	Yes	09/30/2018	09/27/2018

**Responsible Official(s)**

<b>Title</b>	<b>Name</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>
Director, OCRD	Mariam Harvey	Yes
DASHR CHCO	Trevor Norris	Yes

**Planned Activities Toward Completion of Objective**

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
6/30/2016	Draft and finalize Diversity in the Career Senior Executive Service at the Department of the Treasury and the Processes for Selecting New Executives FY 2005 through FY 2015 Report. (OCRd)		06/28/2016
8/30/2016	Brief Departmental Executive Resources Board on the report and get endorsement for the recommendations in the report. (OCRd/DASHR CHCO)		08/15/2016
09/30/2016	Submit final report to ASM for approval and dissemination to Bureau Heads. Disseminated final report to EEO Officers. (OCRd)		09/15/2016

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09/30/2017	Require bureaus to update internal procedures requiring appropriate management official to review the statistics relating to the diversity of the internal pool prior to recruiting internally, to help develop a sufficient pool of diverse internal candidates from which to recruit. (DASHR CHCO/OCRD)	09/30/2018	09/27/2018
09/30/2017	Coordinate changes and/or the development of new tables with CareerConnector/Monster Analytics to ensure applicant flow data is available for <b>all</b> vacancy announcements, not just internal announcements. (OCRD)	09/30/2018	08/25/2018
09/30/2017	Establish policy to require all bureaus to track applicant flow data for all SES CDP programs to enhance barrier analysis capabilities on the SES CDP programs. (DASHR CHCO)	09/30/2018	09/27/2018
09/30/2017	To ensure the broadest pool of candidates for SES vacancies, SES vacancy announcements are to be posted/open for a minimum of 30 days to allow sufficient time to recruit widely. Shorter periods should be on an exception only basis, when there is a demonstrated urgent need. (DASHR CHCO)	09/30/2018	09/27/2018
09/30/2017	To ensure employment opportunities are reaching those intended groups, the working group recommends that each bureau reevaluate where it is currently sending its vacancy announcements to give them the best opportunity to reach those groups with lower than expected application rates as well as overall workforce participation in comparison to their OCLF benchmarks. As part of this recommendation, the working group recommends expansion of the Departmental Offices' contract with the Professional Diversity Network (PDN) to allow all bureaus to announce all SES positions through PDN or an equivalent service. (DASHR CHCO/OCRD)	09/30/2018	09/27/2018
09/30/2017	Establish policy guidance as to composition of the ERBs used to evaluate candidates. Inform Bureaus they should strive to ensure ERB panels are diverse as to gender, race, and ethnicity whenever possible. If a diverse group of subject matter experts is not available, the bureau EEO Officer (if an executive) should be a part of the process. (DASHR CHCO)	09/30/2018	09/27/2018

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09/30/2017	Establish policy guidance requiring ERB panel members and hiring officials to complete unconscious bias or similar training prior to serving on an ERB panel. (DASHR CHCO)	09/30/2018	09/27/2018
09/30/2017	Establish policy requiring HR offices to mask candidate's names or other identifying information when rating/ranking applications for SES or SES candidate development programs. (DASHR CHCO)	09/30/2018	09/27/2018
09/30/2017	Establish policy that when a new SES candidate is appointed, an agency EEO officer will brief her or him on EEO and diversity, including discussing their roles and responsibilities and the demographic composition of their workforce. (OCD)	09/30/2018	09/27/2018
09/30/2017	Incorporate a discussion of EEO and diversity into all SES orientation and training for new executives. (DASHR CHCO/OCD)	09/30/2018	09/27/2018

## Report of Accomplishments

Fiscal Year	Accomplishments
2016	<p>OCD completed the Diversity in the Career Senior Executive Service at the Department of the Treasury and the Processes for Selecting New Executives FY 2005 through FY 2015 Report; the Departmental Executive Resource Board was briefed and concurred with the report findings and recommended actions. The final report was submitted to the ASM for signature and release to Bureau Heads on September 15, 2016 and to bureau EEO Officers on September 22, 2016. (A copy of the report has been uploaded as a supporting document in FedSEP)</p> <p>In August 2015, OCD notified CareerConnector and Monster Analytics of the requirement to expand the current workforce data tables to include external vacancies as well as internal ones. CareerConnector, OCD, and Monster are working together to implement the new requirements in FY 2017.</p>
2017	<p>Due to the transition to a new administration, as well as many other competing budget and reform requirements, the planned activities for completion in FY 2017 had to be modified for completion in FY 2018.</p> <p>Additionally, with the implementation of OPM's new SF-256 in April FY 2017, Monster was unable to make the changes to allow Treasury and its bureaus to look at external as well as internal applicant flow data. Instead, the focus was to ensure applicant flow data tables were capable of collecting and reporting on the new/revised disability codes implemented by the new SF-256. In addition, it was announced that EEOC is in the process of revising the A/B workforce data table requirements for FY 2019. The decision was made to wait until EEOC finalizes and announces any new</p>

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	changes before making any further revisions to the existing MD-715 data tables.
<b>2018</b>	<p>OCRD partnered with Workforce Analytics, Monster and CareerConnector to identify the methodology for capturing required data to complete the revision of the A and B workforce data tables based on EEOC instruction issued with the new MD-715 Version 2 in October 2017.</p> <p>The new workforce data tables now allow the agency to review both internal promotions and external hires applicant flow data for the occupations, feeder pools and SES, as well as by Management Officials (Executives, Managers and Supervisory level) and for formal CDP programs. The tables also incorporated the requirement to be able to view applicant flow data for those that were referred as well as interviewed.</p> <p>In support of the new requirements, DASHR CHCO issued a memorandum to HR Officers at the bureau level requiring them to integrate the new procedures into their process to ensure the capability to capture and report on the new requirements in FY 2019.</p> <p>Additionally, Senior Executive Services issued a guidance memo on September 27, 2018, requiring bureaus to implement policy changes outlined in the planned activities above.</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 0	No X
b. Cluster GS-11 to SES (PWD)	Yes X	No 0

The participation rate for PWD at the GS-11 to SES grade cluster is 10.36% in FY 2018, which falls below the 12% goal.

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

N/A

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

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Treasury issued a memorandum on or around September 25, 2017 to Human Resources (HR) staff and hiring managers, describing the Department's commitment to meeting the numerical goals set forth at Section 501. The memorandum emphasized improving hiring efforts in the mission critical occupations: IT Management; Program Analyst; Accounting; and Financial Management Analysis. Additionally the Department provides Treasury's leadership updates on the participation, grade distribution, hiring, and separations of PWD and PWTD, allowing leadership to make informed decisions on the Department's progress towards meeting the established goals for PWD and PWTD.

## 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.

Yes X      No 0

N/A



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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	
Processing applications from PWD and PWTD	76	3	36	See specific bureau PART J.
Answering questions from the public about hiring authorities that take disability into account	55	3	25	See specific bureau PART J.
Processing reasonable accommodation requests from applicants and employees	47	5	12	See specific bureau PART J.
Section 508 Compliance	144	1	5	See specific bureau PART J.
Architectural Barriers Act Compliance	20	2	256	See specific bureau PART J.
Special Emphasis Program for PWD and PWTD	14	1	5	See specific bureau PART J.
<b>Note:</b> Treasury provides a consolidated count where applicable; however, due to its size, a notation "See specific bureau PART J" was added to assist in identifying bureau responsible official.				

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.

Yes X      No 0

In FY 2018, OCRD provided multiple sessions to the bureau's staff on the new PARTJ and use of the new MD-715 V2 workforce data tables. OCRD and the bureau's Disability Program Managers also participated in the quarterly Federal Exchange on Employment and Disability (FEED) meetings, hosted by EEOC and Department of Labor, which educate attendees on various issues and topic related to disability.

Annually, all HR professionals are required to complete online courses related to veteran's employment, which include disability components. This training, provided by the Department of the Treasury, is mandated by Executive Order (EO) 13518. Also, HR representatives attended a reasonable accommodation (RA) refresher course, which included a disability component.

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**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.

Yes X      No 0

N/A

### 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.

## **A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES**

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

- The Workforce Recruitment Program (WRP) is continually promoted as a source for recruiting students and graduating seniors with disabilities, including disabled veterans.
- The Pathways Intern Program is maximized to hire interns with targeted disabilities.
- Outreach efforts with Disability and Military Student offices are routinely conducted to promote internship opportunities.
- Recruitment events, fairs, and conferences are mapped for annual participation, i.e., Hiring Heroes, Federal Disability Workforce Consortium, the Department of Labor's WRP Training, and the Treasury Department's Veteran Employment Summit at the Treasury Executive Institute to market Treasury and its job opportunities.
- As a part of Treasury's "Be A Champion" initiative, the Disability and Veteran's Program Managers work closely with hiring managers to identify qualified PWD and PWTD, to include disabled veterans, to non-competitively hire using 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.

Schedule A Hiring Authority is promoted and available for use along with Veteran Appointment Authorities to non-competitively appoint PWD/PWTD and veterans with a service-connected disability rating of 30% or more. The Disability Program Manager (DPM) has established numerous external partnerships with private and public organizations that assist PWD/PWTD candidates in finding meaningful employment. The DPM alerted both selecting officials and embedded HR personnel on the value of hiring external disabled applicants. Alerts were made through Saba Centra, an e-Learning product which expands remote access such as email communications, conference calls, and Department-wide online training.

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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 applicants utilize the Schedule A Hiring Authority, the process for eligibility and hire encompasses: 1) Application qualification review process – conducted 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; 2) Applicant referral - individuals 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 (VRA), etc.).

Alternatively, when individuals submit their resumes directly to the Treasury or IRS Special Placement Program Coordinator (SPPC) for vacant positions, the SPPC refers the resumes to the designated servicing HR Specialist. The HR Specialist reviews the resumes to determine qualifications. If qualifications and Schedule A eligibility are met, the resumes are then forwarded to the hiring manager for consideration, with guidance on selection procedures, including the application of veterans' preference, when applicable.

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.

Yes X      No 0      N/A 0

All Treasury managers, supervisors, and selected HR professionals are required to complete veteran's employment online training provided through the Treasury's Integrated Talent Management System (ITMS). Disability training, such as Americans with Disability Act: An Overview for Managers and A Manager's Guide to Diversity, Inclusion and Accommodations, along with other hiring manager tools are also available through ITMS.

**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.

The Department engages with varied organizations such as Department of Vocational Rehabilitation Centers, Veterans Administration (VA) and Department of Labor Employment Service by partnering, providing lectures, and attending on-site presentations and classroom visits to develop stronger relationships with college students and professors, and with college campus clubs and groups that maintain focus on students with disabilities.

Meetings with professional organizations such as Wounded Warriors and Department of Vocational Rehabilitation Centers are held periodically to share Treasury's process for providing vacancy announcements, and share information about opportunities, including career development tracks.

Through a Memorandum of Understanding, Treasury has established a working relationship with the Computer/Electronic Accommodation Program (CAP) to secure devices frequently used by PWD and PWTD.

The Department also established a Treasury-wide sign language interpreters contract to provide an effective and efficient procedure for providing sign language interpreters.

**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 0	No X

Overall Treasury rates of participation are above the federal benchmark.

- PWD New Hires: 14.17% vs 12.0%
- PWTD New Hires: 3.15% vs 2.0%

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

Data from the Treasury Workforce Analytics (WA) Table B8 (All): New hires by Occupational Series and Monster Table B8 (Management Positions by New Hires and Occupational Series) were analyzed to identify triggers among new hires, indicating the following results:

<b>FY 2018 New Hires</b>	<b>Qualified vs. New Hires</b>	<b>Qualified vs. New Hires</b>
0110 (18)	PWD: 3.49% - 5.56%	PWTD: 1.74% - 0.00%***
0340 (3 )	PWD: 5.37% - 0.00%***	PWTD: 3.36% - 0.00%***
0343 (19)	PWD: 7.71% - 21.05%	PWTD: 3.33% - 0.00%***
0501 (10)	PWD: 5.88% - 10.00%	PWTD: 1.78% - 0.00%***
0511 (6)	PWD: 7.18% - 50.00%	PWTD: 3.35% - 0.00%***
0570 (98)	PWD: 3.14% - 9.18%	PWTD: 1.19% - 1.19%
0905 (80)	PWD: 5.20% - 2.50%**	PWTD: 1.80% - 1.25%**
1169 (0)	PWD: 3.78% - 0.00%***	PWTD: 2.33% - 0.00%***
1811 (10)	PWD: 1.58% - 10.00%	PWTD: 0.88% - 0.00%*
2210 (214)	PWD: 5.21% - 31.78%	PWTD: 1.90% - 6.54%

The following triggers were identified:

\*The 1811, Criminal Investigators occupation, limits the employment opportunities available for PWTD based on OPM’s established medical requirements for the position. Therefore, we would expect the hiring of PWD and PWTD to be limited in this series and do not consider the lack of participation to be a trigger.

\*\*However, triggers were noted when comparing the qualified applicant flow data with the hires for PWD in the 0905 occupational series. A slight difference of 0.55% was noted for PWTD in the 0905 occupational series, however, that difference is not significant enough to be considered a trigger at this time. For the five Treasury bureaus that noted the same triggers in their workforce evaluation, these triggers are noted in their PART Js. Plans to improve hiring for PWD/PWTD within the major occupations listed are detailed in the specific bureau PART Js. Treasury will monitor all bureau PART Js to ensure appropriate plans are developed to eliminate any identified barrier(s).

\*\*\* When there is limited hiring there cannot be a realistic expectation that all groups (PWD and PWTD) would be hired at rates comparable to their qualification rates.

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Therefore, Treasury determined a threshold of 20 new hires. Any participation less than 20, will not support a realistic outcome. The occupations with limited hiring 0110, 0340, 0343, 0501, 0511, and 1169, did not have enough hires to determine if there is an actual trigger. (\*1811 is an exception as stated above).

NOTE: It is important to note that when the Department looks at aggregated Treasury-wide data, the progress noted may not accurately reflect the true progress of each bureau. The consolidated view of the data may mask where potential barriers still exist within some of the bureaus. Therefore, a detailed barrier analysis based on bureau specific data into possible glass ceilings, blocked pipelines, and glass walls must be conducted by each of the bureaus. OCRD directed the bureaus to complete detailed analyses to determine if any PWD or PWTDs are facing a potential glass ceiling, blocked pipeline, or glass wall; and, based on their findings, to develop plans to eliminate identified barriers.

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

Data from Monster Table B6 (Mission-Critical Occupations), was analyzed to identify triggers among qualified internal applicants, indicating the following results:

<b>FY 2018 Hires to MCO</b>	<b>Internal Applicants vs. Qualified</b>	<b>Internal Applicants vs. Qualified</b>
0110 (11)	PWD: 5.26% - 3.70%***	PWTD: 2.63% - 3.70%
0340 (229)	PWD: 6.26% - 5.67%**	PWTD: 2.47% - 2.18%**
0343 (320)	PWD: 5.99% - 5.55%**	PWTD: 2.24% - 2.07%**
0501 (326)	PWD: 5.14% - 4.89%**	PWTD: 2.03% - 1.79%**
0570 (1) ***	PWD: 1.98% - 2.27%	PWTD: 0.79% - 0.91%
0905 (9) ***	PWD: 4.35% - 5.00%	PWTD: 0.00% - 0.00%
1169 (30)	PWD: 2.44% - 1.27% ***	PWTD: 0.49% - 0.64%
1811 (48)	PWD: 1.93% - 0.58%*	PWTD: 1.35% - 0.58%*
2210 (543)	PWD: 7.50% - 7.35%**	PWTD: 3.16% - 3.28%**

The following triggers were identified:

\*The 1811, Criminal Investigators occupation, limits the employment opportunities available for PWD and PWTD based on OPM’s established medical requirements for the position. Therefore, we would expect the hiring of PWD and PWTD to be limited.

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**\*\***We noted differences when comparing the applicant flow data with the qualified applicants for PWD and PWTD in the 0340, 0343, 501 and 2210. However those differences are less than 1% and not considered triggers at this time.

For Treasury bureaus that noted the same triggers in their workforce evaluation, these triggers are noted in their PART Js. Plans to improve hiring for PWD within the major occupations listed are detailed in the specific bureau PART Js. Treasury will monitor all bureau PART Js to ensure appropriate plans are developed to eliminate any identified barriers.

**\*\*\*** When there is limited hiring there cannot be a realistic expectation that all groups (PWD and PWTD) would be hired at rates comparable to their qualification rates. Therefore, Treasury determined a threshold of 20 new hires. Any participation less than 20 will not support a realistic outcome. For those occupations with limited hiring in 0110, 0570, 0905, and 1169, there were not enough hires to determine if there is an actual trigger.

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 X
b. Promotions for MCO (PWTD)	Yes 0	No X

Data from the Treasury WA Table B6 (Participation Rates for Mission Critical Occupations) and Monster Table B6 (Participation Rates for Mission-Critical Occupations) were analyzed to identify new hires, indicating the following results:

<b>FY 2018 Hires to MCOs</b>	<b>Qualified vs. Internal Promotions</b>	<b>Qualified vs. Internal Promotions</b>
0110 (11)	PWD: 3.70% - 0.00% *	PWTD: 3.70% - 0.00%*
0340 (229)	PWD: 5.67% - 8.30%	PWTD: 2.18% - 2.18%
0343 (320)	PWD: 5.55% - 9.38%	PWTD: 2.07% - 2.19%
0501 (326)	PWD: 4.89% - 9.82%	PWTD: 1.79% - 2.15%
0570 (1)	PWD: 2.27% - 0.00% *	PWTD: 0.91% - 0.00%
0905 (9)	PWD: 5.00% - 0.00% *	PWTD: 0.00% - 0.00%
1169 (30)	PWD: 1.27% - 1.25%	PWTD: 0.64% - 0.31%
1811 (48)	PWD: 0.58% - 4.17%	PWTD: 0.58% - 0.00%
2210 (543)	PWD: 7.35% - 14.55%	PWTD: 3.26% - 3.50%

The following triggers were identified:



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While there are no noted triggers at the Treasury level, those Treasury bureaus that noted triggers in their workforce evaluation are noted in their PART Js. Plans to improve hiring for PWD/PWTD within the major occupations listed are detailed in the specific bureau PART Js. Treasury will monitor all bureaus' PART Js to ensure appropriate plans are developed to eliminate any identified barriers.

\* When there is limited hiring, there cannot be a realistic expectation that all groups (PWD and PWTD) would be hired at rates comparable to their qualification rates. Therefore, Treasury determined a threshold of 20 hires or less is not enough hires to expect that all groups would be hired at rates comparable to their qualification rates. For those occupations (0110, 0570 and 0905) with limited hiring, there were not enough hires resulting in internal promotions to determine if there is an actual trigger.

## 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.

Treasury's opportunities for advancement are accessible and open to all employees, including employees with disabilities. Treasury offers non-competitive opportunities to streamline the hiring process to fill critical and non-critical positions quickly (e.g. details, including positions that can lead to promotion).

Leadership development opportunities exist for all qualified employees through such programs as Leadership Succession Review for GS-12 to SES employees; Executive Readiness (XR), and Candidate Development Programs (CDP), which can potentially lead to the SES.

Treasury encourages diverse employee (including PWD/PWTD) participation in management, leadership and career development programs through employee network groups (ENGs), such as the Adelante' and the Veterans Employee Resource Group and a variety of other communication venues throughout the agency. Developmental

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opportunities are broadly communicated to all employees through internal weekly and monthly newsletters and internet website postings, and are shared by ENGs.

Treasury encourages individual development plans for all employees. Managers are reminded to consider permanently assigned PWD/PWTD for development opportunities as part of their Individual Development Planning process. All development opportunity announcements are posted on Treasury's internal website.

In conjunction with available training, Treasury will explore, for FY 2020, the development of a committee composed of bureau representatives to consider additional opportunities (e.g., mentoring) for the disabled community.

## **B. CAREER DEVELOPMENT OPPORTUNITIES**

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

The Department of Treasury does not have a formal Career Development Program. However, Treasury bureaus have established varied opportunities to further develop the careers of employees, including PWD and PWTD. The below highlights some programs offered. To view the exhaustive list, please see bureau specific reports.

The Bureau of Engraving offers a series of programs for GS 7-15. Programs include:

- The New Leaders Program (GS 7-11 employees or equivalent). This program focuses on developing future public service leaders and includes leadership self-assessments, experiential learning, and individual development opportunities integrated into a competency-based learning approach.
- The Executive Leadership Program (GS 12-13 employees or equivalent). This program enhances support to organizational mission and goals, focusing specifically on the competency of "leading people" through developmental activities and experiences.
- The Executive Potential Program (GS 14-15 employees or equivalent), a competency-based leadership program that prepares high-potential employees to focus on leading change effectively at the senior level.
- The Career Development Program (GS-11 and below or equivalent), provides to employees whose positions offer limited promotion potential, upward mobility via defined career training using individual career development plans for training and other opportunities for placement into positions in other occupational series for which they would not otherwise be qualified.

Departmental Offices partners with the Treasury Executive Institute (TEI) to offer employees individual coaching services for a six-month period. TEI's coaching services

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assist DO employees to achieve professional goals, solve individual leadership challenges, and develop leadership attributes.

Fiscal Service (FS) offers career development training courses to its employees in career ladder positions to enhance their eligibility for potential promotion to higher grades. In-person and online classes enable FS employees to develop skills to help them advance and qualify for other positions.

IRS offers career development opportunities service-wide to all employees for non-competitive details/promotions and internal merit promotions. In addition, leadership development opportunities are available for all employees. IRS Chief Counsel offers training and development opportunities for attorneys Counsel-wide. Reasonable accommodations are made for all training.

The Mint offers Manufacturer Certification and Apprenticeship programs and Operator Certification and Apprenticeship programs which are available to PWD and PWTD.

The OCC offers at least three professional development programs for its bank examiners. Non-examiners are also exposed to career forums that provide a variety of career options in the non-examiner lines of business. Additionally, OCC offers the 0905 occupational series cross-training and developmental assignments to equip attorneys with legal skills and experience across multiple legal practice areas through the Honors Attorney Program. Overall, training and development courses are available to all employees, in the classroom, online, virtual, and self-study. Temporary details and short-term work assignments are advertised to all employees on the agency's Opportunities Board.

TIGTA's programs include:

- The Office of Audit's Leadership Development Program for Auditors in Grades GS-13, GS-14, and GS-15 allows qualified diverse employees to participate in career development training, and opportunities that will prepare them for Audit management vacancies.
- The Office of Investigations provides diverse employees an opportunity to participate in their Equity, Diversity, and Inclusion Program, which offers career development opportunities for all employees.
- Career developmental opportunities using rotational assignments and business unit details are also encouraged for all TIGTA employees. TIGTA communicates vacancy announcements and detail opportunities to all employees, including PWD/PWTD through email, intranet, and internet.

TTB's primary career development program (CDP) is the Emerging Leaders Program (ELP) – a competitive three year centralized training program available to employees at the Assistant Administrator level. During the 4th quarter of each fiscal year, TTB broadcasts an ELP annual opportunity announcement to request applicants for the Program. The announcement provides general information about the ELP and its three

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programs, identifies the three year curriculum for each program, and explains how employees may apply. The TTB ELP framework consists of three separate and distinct programs:

- Program for non-supervisory employees
- Program for 1st level supervisors
- Program for 2nd level supervisors and senior leaders

All TTB employees, including disabled veterans, are eligible for consideration for the ELP and may apply during the annual announcement period. Selections are made through a competitive process. TTB's Training and Professional Development Division chairs a meeting with senior leaders and provides its recommendations for selection. Senior leaders make the final selections.

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

Career Development Opportunities*	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs						
Fellowship Programs						
Mentoring Programs						
Coaching Programs						
Training Programs						
Detail Programs						
Other Career Development Programs						
*For bureau specific career development opportunities, see bureau PART Js. Treasury will take necessary steps to create a plan of action to track the above requested data.						

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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.

a. Applicants (PWD)	Yes 0	No X
b. Selections (PWD)	Yes 0	No X

N/A

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

a. Applicants (PWTD)	Yes 0	No X
b. Selections (PWTD)	Yes X	No 0

The IRS SES Candidate Development Program indicated the following triggers for any career development programs:

Relevant Applicant Pool	Applicants	Selections
GS 14 - 15s (PWTD): 2.60%	5.79%	2.50%

### 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

The Department analyzed data from the Treasury WA Table B9 against the inclusion rate indicating the following triggers:

The inclusion rate for PWD (12.08%) and PWTD (13.26%) fell slightly below the inclusion rate for employees with no disability (14.67%) for time off awards between 1 - 9 hours.

The inclusion rate for PWD (5.87%) and PWTD (5.95%) fell slightly below the inclusion rate for employees with no disability (6.31%) for time off awards between 31- 40 hours.

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The inclusion rate for PWD (19.48%) and PWTD (18.72%) in cash awards \$1,000 - \$1,999, was below the inclusion rate for employees with no disability (27.90%).

The inclusion rate for PWD (2.31%) and PWTD (2.00%) in cash awards \$2,000 - \$2,999, was below the inclusion rate for employees with no disability (3.95%).

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

The inclusion rate for PWD (2.43%) and PWTD (2.41%) was below the inclusion rate for employees with no disability (3.64%) for QSI awards.

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)	Yes 0	No 0	N/A X
b. Other Types of Recognition (PWTD)	Yes 0	No 0	N/A X

N/A

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## 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 X
ii. Internal Selections (PWD)	Yes X	No 0

b. Grade GS-15

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

c. Grade GS-14

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

d. Grade GS-13

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

Data from the Treasury WA Table B7 Applicants and Hires by Disability and the Monster (M) B7 – Applicants and Hires by Senior Grade Levels were analyzed to identify qualified internal applicants and/or selectees for promotion to senior grade levels with disabilities, indicating the following results:

	Qualified Internal Applicants vs Selectees (M)		Promotions (WA)
GS-13 PWD:	4.06%	3.58%	11.53%
GS-14 PWD:	6.77%	5.96%	10.27%
GS-15 PWD:	6.34%	5.17%	10.96%
SES PWD:	23.08%	5.56%	16.67%*

\*Triggers were identified for PWD selections at the SES level when looking at both internal selections and promotions. The trigger was noted between the rate at which applicants were qualified (23.08%) and their rate of selection (5.56%) when analyzing the tables (M). However, we also note that when analyzing the additional table for promotion/conversion (WA), rates for PWD at the SES level exceeded their selection

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rate as well. While there were internal vacancy announcements that reflect the applicant flow data, the significant difference in the percentage of the Qualified Applicant Pool, the Selection and the Promotions are the result of existing employees who applied not only to internal vacancy announcements, but to all status vacancy announcements open to all Federal employees in FY 2018. This will also result in differences between internal/external selections and promotions rates.

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 X
ii. Internal Selections (PWTD)	Yes X	No 0

b. Grade GS-15

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

c. Grade GS-14

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

d. Grade GS-13

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

Data from the Treasury WA Table B7 Applicants and Hires by Disability and the Monster **(M)** B7 – Applicants and Hires by Senior Grade Levels were analyzed to identify qualified internal applicants and/or selectees for promotion to senior grade levels with targeted disabilities, indicating the following results:

	Qualified Internal Applicants vs Selectees (M)		Promotions (WA)
GS-13 PWTD:	3.53%	0.97% *	2.28%
GS-14 PWTD:	2.82%	2.66%	2.60%
GS-15 PWTD:	3.35%	2.89% *	1.83%
SES PWTD:	7.69% *	5.56% *	0.00%



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The following triggers were identified:

\*Triggers were identified for PWTD selections at the GS-13, GS-15 and SES level. The triggers were noted between the rate at which applicants were qualified and their rate of selection (M). However, we also note that when analyzing the additional table for promotion/conversion (WA), rates for PWTD at the GS-15 and SES level are lower than their selection rate.

While there were internal vacancy announcements that reflect the applicant flow data, the significant difference in the percentages of the Qualified Applicant Pool, the Selections and the Promotions are the result of existing employees who applied to not only internal vacancy announcements, but to all status vacancy announcements open to all Federal employees in FY 2018. This will also result in differences between internal/external selections and promotions rates.

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 X
b. New Hires to GS-15 (PWD)	Yes 0	No X
c. New Hires to GS-14 (PWD)	Yes 0	No X
d. New Hires to GS-13 (PWD)	Yes 0	No X

N/A

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.

a. New Hires to SES (PWTD)	Yes 0	No X
b. New Hires to GS-15 (PWTD)	Yes 0	No X
c. New Hires to GS-14 (PWTD)	Yes 0	No X
d. New Hires to GS-13 (PWTD)	Yes 0	No X

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N/A

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 X
ii. Internal Selections (PWD)	Yes 0	No X

b. Managers

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

c. Supervisors

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

Data from the Treasury WA Table B8 New Hires by Disability and the Monster B8 – (Management Positions by New Hires and Occupational Series) Applicants and Hires were analyzed to identify qualified internal applicants and/or selectees for promotion to supervisory positions, with disabilities, indicating the following results:

<b>Supervisory positions</b>	<b>Qualified Applicants</b>	<b>Promotions</b>
Executives PWD:	5.56%	11.31%
Managers PWD:	0.00%	9.77%
Supervisors PWD:	0.00%	9.98%

There were no internal-only Manager and Supervisor vacancy announcements in FY 2018. The selection for promotions noted above are the result of existing employees applying to all status vacancy announcements open to all Federal employees in FY 2018.

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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 X
ii. Internal Selections (PWTD)	Yes X	No 0

b. Managers

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

c. Supervisors

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

Data from the Treasury WA Table B8 New Hires by Disability and the Monster B8 – (Management Positions by New Hires and Occupational Series) Applicants and Hires were analyzed to identify qualified internal applicants and/or selectees for promotion to supervisory positions, with targeted disabilities, indicating the following results:

<b>Supervisory Positions</b>	<b>Qualified Applicants</b>	<b>Promotions</b>
Executives PWTD:	5.56%	1.81%*
Managers PWTD:	0.00%	2.14%
Supervisors PWTD:	0.00%	2.67%

There were no internal-only Manager and Supervisor vacancy announcements in FY 2018. The selection for promotions noted above are the result of existing employees applying to all status vacancy announcements open to all Federal employees in FY 2018.

However, the following trigger was identified:

\*The promotion/conversion rate for PWTD at the Executive level is lower than their qualified rate.

NOTE: It is important to note that when the Department looks at Treasury-wide data as a whole, the progress noted may not be an accurate reflection of the true progress of each bureau. The consolidated view of the data may mask where potential barriers

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still exist within some of the bureaus. Therefore, a detailed barrier analysis based on bureau specific data into possible glass ceilings, blocked pipelines and glass walls must be conducted by each of the bureaus. OCRD expressed to the bureaus requirements to complete detailed analyses to determine if any PWD or PWTDs are facing a potential glass ceiling, blocked pipeline or glass wall; and based on their findings, develop plans to eliminate identified barriers.

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

N/A

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.

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

Data from the Treasury WA Table B8 New Hires by Disability and the Monster B8 – (Management Positions by New Hires and Occupational Series) Applicants and Hires were analyzed to identify qualified external applicants and/or selectees for new hires to supervisory positions, with targeted disabilities, indicating the following results:

<b>Supervisory Positions</b>	<b>Qualified External Applicants</b>	<b>New Hires</b>
Executives PWTD:	2.78%	3.70%
Managers PWTD:	2.28%	4.00%
Supervisors PWTD:	30.00%	0.00%*

The following triggers were identified:

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\*While 30% of the external applicants with a targeted disability in our supervisory positions were qualified, an external applicant was not hired.

## 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.

### **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 X      N/A 0

In FY 2018, Treasury had 65 Schedule A employees who were eligible for conversion to competitive service appointments. Of that:

- 57 were timely converted to career status;
- 5 are untimely (2 pending conversion and 3 pending personnel action);
- 1 was not converted based on unsatisfactory performance; and
- 2 were voluntarily separated.

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

The inclusion rate for PWD (11.41%) exceeded the inclusion rate of persons with no disability (9.08%) for voluntary separations.

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When evaluating the types of voluntary separations, we noted that 59% were due to retirement, 5% were transfers and 30% were resignations. The remaining 5% were due to death. Based on comments in the FY 2018 Treasury Employee Exit Survey and the explanation cited below in question #4, Treasury does not consider the separations “due to retirement” a trigger. However, each bureau where a trigger has been identified will be asked to evaluate those voluntary separations due to transfers, and resignations, along with information gleaned from their exit survey, to determine if these triggers are a potential barrier.

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)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
b. Involuntary Separations (PWTD)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

The inclusion rate for PWTD (11.17%) exceeded the rate of persons with no disability (9.08%) for voluntary separations.

When evaluating the types of voluntary separations, we noted that 59% were due to retirement, 5% were transfers and 30% were resignations. The remaining 5% were due to death. Based on comments in the FY 18 Treasury Employee Exit Survey and the explanation cited below in question #4, Treasury does not consider the separations “due to retirement” a trigger. However, each bureau where a trigger has been identified will be asked to evaluate those voluntary separations due to transfers and resignations, along with information gleaned from their exit survey, to determine if these triggers are a potential barrier.

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.

When evaluating the types of voluntary separations, we noted that 59% were due to retirement, 5% were transfers and 30% were resignations. The remaining 5% were due to death. Treasury does not consider the separations “due to retirement” a trigger. However, bureaus will be asked to evaluate those voluntary separations due to transfers and resignations, along with information gleaned from the exit survey, to determine if these triggers are potential barrier.

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During the period of October 1, 2017 through September 30, 2018, 254 permanent/seasonal PWD responded to the Department's Exit Survey. The overall responses from PWD were similar to the overall permanent/seasonal employee responses, in that 41% (105) had more than 25 years of service and 78% (198) were age 50 or older. Of the respondents with disabilities, 32% (82) were disabled veterans. The most frequently cited reason for separation of PWD was retirement (149 or 59%).

The factor most frequently cited as impacting a PWD's decision to leave was job stress (69%). Additional factors frequently cited include office morale (60%); office organization and alignment with regard to effective and efficient service (51%); resources to do the job (50%); access to developmental opportunities (53%); ability to participate in decisions (48%); pay in relation to job responsibilities and performance (47%) reasonableness of workload (50%); and, job description in relation to actual duties and responsibilities (45%).

Separately, 74% of the respondents indicated their work experience was generally positive; 61% stated they would be interested in returning to work for Treasury; and, 67% stated they would recommend Treasury as a good place to work.

## **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.

The "Accessibility" page on the public Treasury.gov website, <https://home.treasury.gov/utility/accessibility>, provides three links with resources for Persons with Disabilities.

Information on how to file a complaint can be found at:  
<https://www.treasury.gov/about/organizational-structure/offices/Mgt/Pages/discrimination-complaint.aspx>

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The following address, located on the Treasury.gov public website, provides information and explains employee and applicant rights under Section 508 of the Rehabilitation Act: <https://section508.gov/manage/laws-and-policies>.

Additionally, the following link (which is also located on the "Accessibility" page), provides information regarding how to file a complaint of discrimination: [https://www.treasury.gov/about/organizational-structure/offices/Mgt/Documents/Section508\\_Complaint\\_Processing.pdf](https://www.treasury.gov/about/organizational-structure/offices/Mgt/Documents/Section508_Complaint_Processing.pdf).

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.

Regarding physical accessibility, the following address is located under the "Accessibility" page on the public Treasury.gov website:

<https://home.treasury.gov/utility/accessibility/physical-accessibility>.

Additionally, the following link (which is also located on the "Accessibility" page) provides information regarding how to file a complaint of discrimination:

<https://home.treasury.gov/utility/accessibility/disability-resources>.

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

In FY 2018, OCRD conducted two accessibility reviews of buildings occupied by DO employees – 717 14<sup>th</sup> Street and 1801 L Street.

At 717 14<sup>th</sup> Street, a Treasury-leased space, the accessibility review indicated a number of important requirements are not being met. OCRD identified forty-eight (48) deficiencies requiring a corrective action. The review was signed by the OCRD Director and submitted to the Deputy Assistant Secretary for Operations on July 10, 2018.

For 1750 Pennsylvania Avenue, also a Treasury-leased space, the review indicated that the space was mostly accessible. OCRD identified twenty-nine (29) deficiencies that required a corrective action. The review was signed by the OCRD Director and submitted to the Deputy Assistant Secretary for Operations on October 5, 2018. OCRD is monitoring the completion of work to correct identified deficiencies.



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In FY 2019, OCRD will conduct two accessibility reviews on DO leased properties located at 1722 I Street and the Colorado Building. In addition, OCRD will conduct an accessibility review of the external program conducted by Fiscal Service.

### **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.)

Each bureau is responsible for independently processing their requests for reasonable accommodations. The average time frame (number of days) for processing within the bureaus for FY 2018 are:

BEP	04
DO	20
FinCEN	14
FS	06
Mint	08
IRS	76
OCC	07
TIGTA	10
TTB	13

The overall average for processing the Departments initial requests for reasonable accommodations is 18 days. The Department recognizes the high average for IRS which is currently reviewing its methodology for calculating “average days for providing reasonable accommodations.” Treasury developed an implementation plan to acquire a Treasury-wide reasonable accommodation tracking system that will eliminate the need to manually calculate processing timeframes.

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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.

The Department has an effective Disability Program, supported by various policies, procedures, and practices, as evidenced by overall timely processing requests for accommodations. Mandatory training for new managers and supervisors includes responsibilities on providing reasonable accommodations. Throughout FY 2018, bureaus provided reasonable accommodations guidance via training courses, newsletters, and postings on its intranet websites (see specific bureau submission for details). The Department manages a Treasury-wide contract that provides an effective and efficient procedure for providing sign language interpreter services. Bureaus are responsible for monitoring reasonable accommodation data for trends relating to the workforce.

**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.

Treasury established its PAS policy and procedures during FY 2018; however, Treasury did not receive any requests for PAS. Training will be provided to all managers, supervisors, and selected HR Professionals throughout FY 2019. PAS training will be added to orientation for all newly-hired managers and newly-promoted managers.

## 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 X      No 0      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.

Treasury had one final agency decision involving harassment based on disability and reprisal. This case resulted in an order of training and consideration of disciplinary action. Complainant appealed the AJ's order and a settlement agreement was reached resolving all matters.

### **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 X      No 0      N/A 0

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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.

Five Findings - (3) Final Agency Decisions (FAD) and (2) Administrative Judge (AJ) final order.

**FADs:**

- (1) Disability discrimination for failure to provide reasonable accommodation – training ordered and provided; disciplinary actions were ordered to be considered and are pending.
- (2) Disability discrimination for failure to provide reasonable accommodation - provision of the software was provided; training was ordered and provided; and disciplinary actions were ordered to be considered and provided in the form of an oral counseling.
- (3) Disability discrimination for unreasonable delay in providing ergonomic chair - training was ordered and provided.

**AJ Final Orders:**

- (4) Disability discrimination for harassment and termination during probationary period in mixed motive case - training and consideration of discipline were ordered to be considered; complainant appealed; and agency and Complainant entered into settlement agreement resolving all matters.
- (5) Hostile work environment in reprisal for prior EEO activity - no training or consideration of disciplinary action was ordered due to separated responsible management official.

## 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 0          No X

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

Yes 0          No 0          N/A X

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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.

<b>Trigger 1</b>	Note: Based on the triggers reported in this document, each bureau is required to report independently its plan to address those notable deficiencies.			
<b>Barrier(s)</b>				
<b>Objective(s)</b>				
<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan?</b> (Yes or No)		
<b>Barrier Analysis Process Completed?</b> (Yes or No)		<b>Barrier(s) Identified?</b> (Yes or No)		
<b>Sources of Data</b>	<b>Sources Reviewed?</b> (Yes or No)	<b>Identify Information Collected</b>		
Workforce Data Tables				
Complaint Data (Trends)				
Grievance Data (Trends)				
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)				
Climate Assessment Survey (e.g., FEVS)				
Exit Interview Data				
Focus Groups				
Interviews				
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)				
Other (Please Describe)				
<b>Target Date</b> (mm/dd/yyyy)	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding</b> (Yes or No)	<b>Modified Date</b> (mm/dd/yyyy)	<b>Completion Date</b> (mm/dd/yyyy)

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Fiscal Year	Accomplishments

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

NOTE: It is important to note that when the Department looks at aggregated Treasury-wide data, the progress noted may not accurately reflect the progress of each bureau. The aggregated data may mask where potential barriers still exist within some of the bureaus. Therefore, a detailed barrier analysis based on bureau specific data into possible glass ceilings, blocked pipelines, and glass walls must be conducted by each of the bureaus. OCRD directed the bureaus to complete detailed analyses to determine if any PWD or PWTDS are facing a potential glass ceiling, blocked pipeline, or glass wall; and, based on their findings, to develop plans to eliminate identified barriers.

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

NOTE: It is important to note that when the Department looks at aggregated Treasury-wide data, the progress noted may not accurately reflect the progress of each bureau. The aggregated data may mask where potential barriers still exist within some of the bureaus. Therefore, a detailed barrier analysis based on bureau specific data into possible glass ceilings, blocked pipelines, and glass walls must be conducted by each of the bureaus. OCRD directed the bureaus to complete detailed analyses to determine if any PWD or PWTDS are facing a potential glass ceiling, blocked pipeline, or glass wall; and, based on their findings, to develop plans to eliminate identified barriers.

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.

NOTE: It is important to note that when the Department looks at aggregated Treasury-wide data, the progress noted may not accurately reflect the progress of each bureau. The aggregated data may mask where potential barriers still exist within some of the bureaus. Therefore, a detailed barrier analysis based on bureau specific data into possible glass ceilings, blocked pipelines, and glass walls must be conducted by each of the bureaus. OCRD directed the bureaus to complete detailed

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analyses to determine if any PWD or PWTDs are facing a potential glass ceiling, blocked pipeline, or glass wall; and, based on their findings, to develop plans to eliminate identified barriers.