

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

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

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

### Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 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.

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

a. Cluster GS-1 to GS-10 (PWD)	Answer: No
b. Cluster GS-11 to SES (PWD)	Answer: Yes

PWD are participating at a rate (11.09%) slightly below the 12% bench mark at the grade cluster GS-11 to SES.

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

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

a. Cluster GS-1 to GS-10 (PWTD)	Answer: No
b. Cluster GS-11 to SES (PWTD)	Answer: No

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

Treasury has communicated the overall disability goals with its bureaus through the quarterly HR Stat, HCAC meetings, OCRD Advisory Newsletter, EEO Officer Meetings and the "Be a Champion" Roadshows. Treasury's bureaus also have communicated the disability goals to their leadership through various methods to include new manager and supervisor training, newsletters, staff meetings, electronic bulletin boards, and bureau/organization specific dashboards.

### 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 DISABILITY PROGRAM**

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

Answer: Yes

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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	59	1	10	See specific bureau PART J's.
Answering questions from the public about hiring authorities that take disability into account	40	1	11	See specific bureau PART J's.
Processing reasonable accommodation requests from applicants and employees	63	0	13	See specific bureau PART J's.
Section 508 Compliance	111	0	4	See specific bureau PART J's.
Architectural Barriers Act Compliance	18	1	305	See specific bureau PART J's.
Special Emphasis Program for PWD and PWTD	16	0	5	See specific bureau PART J's.

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(s) that disability program staff have received. If “no”, describe the training(s) planned for the upcoming year.

Answer: Yes

Treasury’s Disability and Veteran Employment Program Managers have provided training as needed through Treasury Learning Management System (TLMS), Enterprise Learning Management System (ELMS), workshops and refresher training. When needed, Treasury/bureaus coordinate training with external sources such as EEOC.
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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.

Answer: Yes

### Section III: Program Deficiencies in the Disability Program

In Part G of its FY 2017 MD-715 report, the agency identified the following program deficiencies involving its disability program:

Program Deficiencies	Agency Comments
Is there a central fund or other mechanism for funding supplies, equipment and services necessary to provide disability accommodations?	Each bureau is responsible for funding disability accommodations requests. However, OCC and FinCEN have implemented a centralized fund for all accommodations and DO has implemented a centralized fund for providing interpreter services.
Are 90% of accommodation requests processed within the frame set forth in the agency procedures for reasonable accommodation?	OCC and IRS both reported no. See Bureau PART H’s outlining plans to correct untimely processing.

### Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

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

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

Treasury utilizes OPM’s Talent portal in USAJobs to identify qualified PWD, PWTD and veterans and refer qualified applicants to hiring managers. Treasury’s Veterans Program Coordinator provides all vacancies to veteran organizations that assist transitioning veterans, including those with disabilities, in finding employment. Treasury and Bureau Disability and Veterans Program Managers have also established relationships with organizations that assist PWD, PWTD and Veterans seeking employment.

Treasury’s Disability and Veterans Program Managers also maintain resumes of qualified PWD and PWTD, including veterans with disabilities, who indicate they are interested in seeking employment opportunities at Treasury. When a hiring manager identifies an upcoming opening, the Disability and Veterans Program Managers send the hiring manager resumes of those PWD, PWTD and veterans who may be qualified.

Treasury and its bureaus also utilize the Workforce Recruitment Program (WRP) to find and select college students and recent graduates with disabilities, including those

with targeted disabilities.

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 is available for use along with Veteran Appointment Authorities to non-competitively appoint PWD and PWTD and veterans with service-connected disability rating of 30% or more. The Department's Disability and Veterans Program Managers work directly with bureau Disability Coordinators, Selective Placement Coordinators and Program Managers to assist in finding qualified candidates for non-competitive special hiring authorities. Additionally, through its Be a Champion Program, the Disability and Veterans Program Managers have established relationships with bureau hiring managers to identify resumes of qualified candidates who can be non-competitively selected.

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

When individuals apply utilizing the Schedule A Hiring Authority, their applications are reviewed by the servicing HR Specialist who confirms that the applicants meet the qualification requirements of the announced position and have provided required proof of disability. Applicants applying under the Schedule A Hiring Authority who are deemed qualified are referred to the hiring manager on a Schedule A certificate of eligibility with guidance on selection procedures including the application of veterans' preference, when applicable. Managers have the option to interview and/or hire from the Schedule A certificate or to consider other candidates from other issued certificates (Merit Promotion, Non-Competitive, VRA, etc.). Alternatively, when individuals submit their resumes directly to the Treasury or bureau Special Placement Program Coordinator (SPPC) for vacant positions within Treasury, the SPPC refer the resumes to requesting hiring managers for consideration. The hiring manager refers selected resumes to the HR Specialist who reviews the resumes to determine qualifications. If qualifications and Schedule A eligibility are met, the resumes are returned to the hiring manager 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.

Answer: Yes

Treasury includes the use of special hiring authorities (e.g. Schedule A, VRA, 30% or more, etc.) in its mandatory training for new managers and supervisors. Also, through Treasury's Be a Champion Program, the Disability and Veterans Program Managers provide training for bureau hiring managers, educating them on the benefits of using special hiring authorities, and assist in identifying resumes of qualified candidates who can be non-competitively selected and hired.

Additionally, Treasury's Disability and Veterans Program Managers have provided

bureau hiring managers with disability and veteran tool kits which highlight the use of hiring authorities that take disability into account.

**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.

- Partner, lecture, and attend on-site presentations, and classroom visits in order to develop stronger relationships with college students and professors and with campus clubs and groups focusing on students with disabilities on college campuses.
- Hold periodic meetings with professional organizations to share Treasury’s process for providing vacancy announcements and information about opportunities.
- Attend specialty conferences and career/job fairs to share information about Treasury’s mission, work environment and job opportunities.
- Host brown bag lunches and roundtable discussions between hiring managers/senior management, and HC and organizations that assist PWD/PWTD.

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

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

- a. New Hires for Permanent Workforce (PWD)      Answer: No
- b. New Hires for Permanent Workforce (PWTD)      Answer: No

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

FY 2017 Hires	Applicants vs. Hires	Applicants vs. Hires
0110 (20) Hires:	PWD: 4.59% - 5.00%	PWTD: 2.75% - 0.00%
0340 (11) Hires:	PWD: 4.37% - 9.09%	PWTD: 1.73% - 9.09%
0343 (62) Hires:	PWD: 4.52% - 11.29%	PWTD: 1.94% - 3.23%
0501 (29) Hires:	PWD: 4.94% - 20.99%	PWTD: 1.83% - 0.00%
0511 (18) Hires:	PWD: 3.52% - 5.56%	PWTD: 1.69% - 0.00%
0570 (167) Hires:	PWD: 2.77% - 4.19%	PWTD: 1.19% - 0.00%
0905 (50) Hires:	PWD: 3.20% - 4.00%	PWTD: 1.14% - 0.00%
1169 (35) Hires:	PWD: 1.94% - 17.14%	PWTD: 0.88% - 2.86%
1811 (53) Hires:	PWD: 3.32% - 1.89%	PWTD: 1.42% - 0.00%
2210 (377) Hires:	PWD: 5.26% - 22.55%	PWTD: 2.43% - 3.89%

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

However, we do note triggers when comparing the applicant flow data with the hires for PWTB for the occupational series 0110, 0501, 0511, 0570, and 0905's. Treasury bureaus that noted the same triggers in their workforce evaluation have addressed these triggers in the bureau PART J. For plans to improve hiring for PWD within the major occupations listed see the specific bureau PART J's.

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTB 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) Answer: No

b. Qualified Applicants for MCO (PWTB) Answer: No

This data is a new requirement to be implemented with the FY 2018 reporting and revised MD-715 V2 data tables. Treasury is in the process of discussing the new MD-715 V2 data tables with our data providers; Enterprise Data Management and Monster/CareerConnector. We will work throughout FY 2018 to develop and release the revised data tables for the FY 2018 reporting period.

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTB among employees promoted to any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below.

a. Promotions for MCO (PWD) Answer: Yes

b. Promotions for MCO (PWTB) Answer: Yes

Applicants vs. Promotions	Applicants vs. Promotions
0340 - PWD: 4.56% - 2.40%	PWTB: 1.90% - 1.20%
0343 - PWD: 3.90% - 1.72%	PWTB: 1.62% - 0.86%
0501 - PWD: 4.69% - 4.90%	PWTB: 1.80% - 2.94%
0570 - PWD: 2.48% - 1.84%	PWTB: 1.30% - 0.74%
0905 - PWD: 1.00% - 0.00%	PWTB: 0.00% - 0.00%
1169 - PWD: 1.94% - 1.25%	PWTB: 0.88% - 0.31%
2210 - PWD: 4.85% - 1.72%	PWTB: 2.57% - 0.57%

We noted triggers when comparing the applicant flow data with the promotion data for PWD in the following occupations: 0340, 0343, 0570, 0905, 1169 and 2210. Additionally, triggers were noted when comparing the applicant flow data with the promotion data for PWTB in the following occupations: 0340, 0343, 0570, 1169 and 2210. Treasury bureaus that noted the same triggers in their workforce evaluation have addressed these triggers in their bureau PART J. For plans to improve advancement opportunities for PWD and PWTB within the major occupations listed see specific bureau PART J's.

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

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

opportunities for employees with disabilities.

## A. ADVANCEMENT PROGRAM PLAN

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

Bureaus have established bureau specific programs for the advancement of PWDs and PWTDs. For details see specific bureau Part J's.

## B. CAREER DEVELOPMENT OPPORTUNITIES

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

Treasury has three bureaus (IRS, OCC and TTB) with formal career development programs. For details see specific bureau Part J's.

2. 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 applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

a. Applicants (PWD)

Answer: No

b. Selections (PWD)

Answer: No

Treasury does not have a Treasury-wide career Development program, therefore there is no data available.

3. 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)

Answer: No

b. Selections (PWTD)

Answer: No

Treasury does not have a Treasury-wide career Development program, therefore there is no data available.

## C. AWARDS



1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If "yes", please describe the trigger(s) in the text box.
  - a. Awards, Bonuses, & Incentives (PWD) Answer: Yes
  - b. Awards, Bonuses, & Incentives (PWTD) Answer: Yes

The inclusion rate for PWD (12.15%) and PWTD (12.78%) fell slightly below the inclusion rate for employees with no disability (14.60%) for time off awards between 1 - 9 hours.

The inclusion rate for PWD (21.61%) for time off awards of more than 9 hours fell slightly below the inclusion rate for employees with no disability (21.63%). However, the inclusion rate for PWTD (22.89%) was above the inclusion rate for persons with no disability.

The inclusion rate for PWD (15.56%) in cash awards \$500 or less, was above the inclusion rate for employees with no disability (14.13%). However the inclusion rate for PWTD (12.43%) fell below the inclusion rate for employees with no disability.

The inclusion rate for PWD (40.84%) and PWTD (40.69%) was below the inclusion rate for employees with no disability (54.35%) for cash awards of \$501 and greater. Treasury bureaus that noted the same triggers in their workforce evaluation are required to address these triggers in their bureau PART J; see specific bureau PART J's.

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

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.

Treasury bureaus that noted the same triggers in their workforce evaluation are required to address these triggers in their bureau PART J; see specific bureau PART J's.

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If "yes", describe the employee recognition program and relevant data in the text box.
  - a. Other Types of Recognition (PWD) Answer: N/A
  - b. Other Types of Recognition (PWTD) Answer: N/A

**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) Answer: No
- ii. Internal Selections (PWD) Answer: No

b. Grade GS-15

- i. Qualified Internal Applicants (PWD) Answer: No
- ii. Internal Selections (PWD) Answer: No

c. Grade GS-14

- i. Qualified Internal Applicants (PWD) Answer: No
- ii. Internal Selections (PWD) Answer: No

d. Grade GS-13

- i. Qualified Internal Applicants (PWD) Answer: No
- ii. Internal Selections (PWD) Answer: No

Relevant pool/Applicants/Promotions	Relevant Pool/Applicants/Promotions
GS-13 - PWD: 11.85% - 2.71% - 1.82%	PWTD: 3.53% - 0.97% - 0.18%
GS-14 - PWD: 9.00% - 4.33% - 2.72%	PWTD: 2.48% - 2.02% - 1.49%
GS-15 - PWD: 8.64% - 2.84% - 2.63%	PWTD: 2.31% - 1.09% - 1.32%

SES Vacancy announcements are not posted internally to Treasury or its bureaus. All SES vacancy announcements are required to be posted externally. Additionally, Treasury's systems do not have the capability to identify internal applicant from external applicants on external vacancy announcements.

Treasury bureaus that noted the same triggers in their workforce evaluation are required to address these triggers in their bureau PART J. For plans to improve advancement opportunities for PWD and PWTD within the major occupations listed, see specific bureau PART J's.

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)                      Answer: No
- ii. Internal Selections (PWTD)                                      Answer: No

b. Grade GS-15

- i. Qualified Internal Applicants (PWTD)                      Answer: No
- ii. Internal Selections (PWTD)                                      Answer: No

c. Grade GS-14

- i. Qualified Internal Applicants (PWTD)                      Answer: No
- ii. Internal Selections (PWTD)                                      Answer: No

d. Grade GS-13

- i. Qualified Internal Applicants (PWTD)                      Answer: No
- ii. Internal Selections (PWTD)                                      Answer: No

Relevant Pool    Applicants/Promotions  
 GS-13 - PWTD: 3.53% - 0.97% - 0.18%  
 GS-14 - PWTD: 2.48% - 2.02% - 1.49%  
 GS-15 - PWTD: 2.31% - 1.09% - 1.32%

SES Vacancy announcements are not posted internally to Treasury or its bureaus. All SES vacancy announcements are required to be posted externally. Additionally, Treasury's bureaus do not have the capability to identify internal applicant from external applicants on external vacancy announcements.

Treasury bureaus that noted triggers in their workforce evaluation are required to address these triggers in their bureau PART J. For plans to improve advancement opportunities for PWD and PWTD within the major occupations listed, see specific bureau PART J's.

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)    Answer: No
- b. New Hires to GS-15 (PWD)    Answer: No
- c. New Hires to GS-14 (PWD)    Answer: No

d. New Hires to GS-13 (PWD)

Answer: No

This is not an FY 2017 reporting requirement, Treasury and its bureaus will be taking appropriate steps to be able to report this information as part of the FY 2018 reporting period.

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)

Answer: No

b. New Hires to GS-15 (PWTD)

Answer: No

c. New Hires to GS-14 (PWTD)

Answer: No

d. New Hires to GS-13 (PWTD)

Answer: No

This is not an FY 2017 reporting requirement, Treasury and its bureaus will be taking appropriate steps to be able to report this information as part of the FY 2018 reporting period.

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)

Answer: No

ii. Internal Selections (PWD)

Answer: No

b. Managers

i. Qualified Internal Applicants (PWD)

Answer: No

ii. Internal Selections (PWD)

Answer: No

c. Supervisors

i. Qualified Internal Applicants (PWD)

Answer: No

ii. Internal Selections (PWD)

Answer: No

This is not an FY 2017 reporting requirement, Treasury and its bureaus will be taking appropriate steps to be able to report this information as part of the FY 2018 reporting period.

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) Answer: No

ii. Internal Selections (PWTD) Answer: No

b. Managers

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

c. Supervisors

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

This is not an FY 2017 reporting requirement, Treasury and its bureaus will be taking appropriate steps to be able to report this information as part of the FY 2018 reporting period.

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) Answer: No

b. New Hires for Managers (PWD) Answer: No

c. New Hires for Supervisors (PWD) Answer: No

This is not an FY 2017 reporting requirement, Treasury and its bureaus will be taking appropriate steps to be able to report this information as part of the FY 2018 reporting period.

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) Answer: No

b. New Hires for Managers (PWTD) Answer: No

c. New Hires for Supervisors (PWTD) Answer: No

This is not an FY 2017 reporting requirement, Treasury and its bureaus will be taking appropriate steps to be able to report this information as part of the FY 2018 reporting period.

## Section VI: 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.

Answer: No

In FY 2017, Treasury had 37 Schedule A employees who were eligible for conversion to competitive service appointments. Of that:

- 31 were timely converted to career status
- 2 were untimely converted
- 2 were not converted based on unsatisfactory performance

2 were involuntarily separated based on FY 2017 budget cuts in the organization.

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

a. Voluntary Separations (PWD) Answer: Yes

b. Involuntary Separations (PWD) Answer: Yes

The inclusion rate for PWD (1.01%) exceeded the rate of persons with no disability (0.69%) for involuntary separations. The inclusion rate for PWD (10.21%) also exceeded the inclusion rate for persons with no disability (8.56%) for voluntary separations.

The "inclusion rate" for this purpose is determined by dividing the number of permanent employees with disabilities who voluntarily separated (129) by the total number of employees with disabilities 12,664. That rate, 1.01%, exceeds the 0.69% "inclusion rate" for permanent employees without disabilities who voluntarily separated (570 divided by 82,087).

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

a. Voluntary Separations (PWTD) Answer: No

b. Involuntary Separations (PWTD) Answer: Yes

The (inclusion rate) for PWTD (0.94%) exceeded the rate of persons with no disability (0.69%) for involuntary separations. The inclusion rate for PWTD (8.40%) did not exceed the inclusion rate for persons with no disability (8.56) for voluntary

separations.

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

During the period of October 1, 2016 through September 30, 2017, 202 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 48% (97) had more than 25 years of service and 76% (153) were age 50 or older. Of the respondents with disabilities, 31% (63) were veterans. The most frequently cited reason for separation of PWD was retirement (126 or 62%). The factor most frequently cited as impacting a PWD's decision to leave was job stress (75%). Additional factors frequently cited include office morale (64%); office organization and alignment with regard to effective and efficient service (51%), resources to do the job (51%), ability to participate in decisions (48%), access to developmental opportunities (48%), pay in relation to job responsibilities and performance (47%), reasonableness of workload (46%), and job description in relation to actual duties and responsibilities (46%). 71% of the respondents indicated their work experience was generally positive and 64% stated they would recommend Treasury as a good place to work. PWD (69%) were slightly less likely to indicate that they would recommend Treasury as a good place to work, as compared to the 72% of all respondents.

## B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 C.F.R. § 1614.203(d)(4), federal agencies are required to inform job 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 overall "Accessibility" page on the public Treasury.gov website, <https://www.treasury.gov/accessibility/Pages/default.aspx>, provides three links with resources for Persons with Disabilities.

Information on how to file a complaint can be found

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://www.treasury.gov/accessibility/Pages/web.aspx>.

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://www.treasury.gov/accessibility/Pages/physical.aspx>.  
 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/accessibility/Pages/disability.aspx>.

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 2017, OCRD conducted two accessibility reviews of buildings occupied by DO employees – 1750 Pennsylvania Avenue and Freedman’s Bank Building (Treasury Annex).

For the Freedman’s Bank Building, the Treasury Library Area was under review. Although the accessibility review indicated that the space is mostly accessible, important requirements are not being met. OCRD identified ten (10) deficiencies requiring a corrective action. The review was signed by Mariam Harvey, Director, OCRD, and submitted to the Deputy Assistant Secretary for Operations on May 26, 2017.

For the Treasury Leased Space, 1750 Pennsylvania Avenue, the review also indicated that the space was mostly accessible, but that there were important requirements not met. OCRD identified twenty-eight (28) deficiencies that required a corrective action. The review was signed by Mariam Harvey, Director, OCRD, and submitted to the Deputy Assistant Secretary for Operations on May 12, 2017.

### **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 request for reasonable accommodations. See below:

**Average Days by Bureau:**

BEP	10
DO	20
FinCEN	15
FS	6
Mint	20
IRS	66
OCC	10
TIGTA	10
TTB	40

Overall average of 22 days.

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.

Overall, the Department has an effective Disability Program, supported by various policies, procedures, and practices, as evidenced by timely processing requests for accommodations. Mandatory new managers and supervisors training includes responsibilities on providing reasonable accommodations. Throughout FY-2017 bureaus provided reasonable accommodations guidance via training courses, newsletters and postings on its intranet websites (see specific bureau submission for details). The Department established a Treasury-wide sign language interpreters contract to provide an effective and efficient procedure for providing sign language interpreters. Bureaus are responsible for monitoring reasonable accommodation data for trends relating to the workforce. z

## **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, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

OPM established the requirement for Personal Assistance Services to be implemented in January 2018. Therefore, for FY 2017, Treasury did not have a policy or procedure in place to implement the PAS requirement. During FY 2018, first quarter, Treasury EEO established a Personal Assistance Services (PAS) Working Group. The initial purpose of this working group is to establish and finalize a Statement of Work (SOW) for procuring a Treasury-wide PAS contract. This contract will allow bureaus to establish a purchase order against the Treasury-wide base contract. While the PAS contract is being established, the PAS working group will create the PAS policy and procedures. In the interim, the Department will follow existing reasonable accommodation policy and procedures to provide PAS.

## **Section VII: EEO Complaint and Findings Data**

### **A. EEO COMPLAINT DATA INVOLVING HARASSMENT**

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

Answer: No

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

Answer: Yes

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

Treasury had one FAD, hostile work environment based on disability and reprisal when, among other things, complainant was denied reasonable accommodation and issued a counseling memorandum; where training and consideration of disciplinary action were ordered – In addition to appropriate relief for the complainant, the following corrective action(s) were taken: training was provided and disciplinary action was considered but found not to be warranted.

## **B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION**

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

Answer: Yes

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

Answer: Yes

3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

Six FAD's: (1) disability discrimination for failure to provide reasonable accommodation; training was ordered for all responsible management officials in office where complainant worked; training is pending; (2) disability discrimination for denial of reasonable accommodation and termination for missing too much time from work during probationary period; training and disciplinary action were ordered; training was provided; disciplinary action is pending; (3) disability discrimination for unnecessary delay in providing operable adaptive equipment, which had been approved pursuant to request for reasonable accommodation; it was determined that management acted in good faith in attempting to provide effective accommodation; (4) disability discrimination for failure to provide reasonable accommodation in line with complainant's physician's recommendation or even act on her request for reasonable accommodation until the EEO complaint was filed; training on the responsibilities of management under the Rehabilitation Act was ordered and was provided; disciplinary action was not ordered because the individual who was primarily responsible for processing the original reasonable accommodation request was no longer employed with the Agency; (5) disability discrimination for delay in providing reasonable accommodation; training and consideration of disciplinary action were ordered; training was provided; decision on disciplinary action is pending; and (6) disability discrimination for failure to provide reasonable accommodation and failure to maintain confidential medical information in separate medical file; training and consideration of disciplinary action were ordered; training was provided and oral counseling was administered to four management officials.

## **Section VIII: Identification and Removal of Barriers**

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

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

Answer: No

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

Answer: No

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</b>		
<b>Barrier(s)</b>		
<b>Objective(s)</b>		
<b>Responsible Official(s)</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>	
<b>Barrier Analysis Process Completed? (Yes or No)</b>	<b>Barrier(s) Identified? (Yes or No)</b>	
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<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)		

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
Fiscal Year	Accomplishments			

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

There were no planned activities to complete

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

There were no planned activities for 2017

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

There were no planned activities for 2017