

Department of the  
Treasury Management  
Directive 715

FY 2017







## **U.S. DEPARTMENT OF THE TREASURY MANAGEMENT DIRECTIVE 715 FY 2017**

### **TABLE OF CONTENTS**

#### **Section I – PARTS A-J**

- PART A: Treasury Identifying Information**
- PART B: Total Employment**
- PART C: Agency Officials Responsible for Oversight of EEO Program**
- PART D: List of Subordinate Components Covered in This Report**
- PART E: Executive Summary**
- PART F: MD-715 Program Certification**
- PART G: Self-Assessment Checklist**
- PART H: Attaining the Essential Elements of a Model EEO Program**
- PART I: Barrier Identification**
- PART J: Program Status Report - Individuals with Targeted Disabilities**

#### **Appendix A: Secretary's EEO Policy and Diversity Policy**

# **SECTION ONE**

## **PARTS A - J**

**PART A - Department or Agency Identifying Information**

Agency	Second Level Component	Address	City	State	Zip Code (xxxxx-xxxx)	CPDF Code (xxxx)	FIPS Code
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	94,751	1,350	96, 101

**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	Kody Kinsley	Assistant Secretary for Management

**PART C.2 - Agency Official(s) Responsible For Oversight of EEO Program(s)**

EEO Program Staff	Name	Title	Occupational Series	Pay Plan and Grade	Phone Number	Email Address
Principal EEO Director/ Official	Mariam Harvey	Director (OCD)	0260	ES	202-622-0316	Mariam.Harvey@treasury.gov
Deputy Director EEO	Gail Demers	Deputy Director (OCD)	0260	GS-15	202-622-0341	Gail.Demers@Treasury.gov

Affirmative Employment Program Manager	Mariam Harvey	Director (OCD)	0260	ES	202-622-0316	<a href="mailto:Mariam.Harvey@treasury.gov">Mariam.Harvey@treasury.gov</a>
Complaint Processing Program Manager	Amelia Demopulos	EEO Program Manager	0260	GS-15	202-622-4178	<a href="mailto:Amelia.Demopulos@Treasury.gov">Amelia.Demopulos@Treasury.gov</a>
Diversity & Inclusion Program Manager	Thomas Lotito	EEO Specialist	0340	GS-14	202-622-8902	<a href="mailto:Thomas.Lotito@Treasury.gov">Thomas.Lotito@Treasury.gov</a>
Manager of Special Emphasis Programs	Griselda Wallace	EEO Program Manager	0260	GS-15	202-622-4134	<a href="mailto:Griselda.Wallace@Treasury.gov">Griselda.Wallace@Treasury.gov</a>
Disability Program Manager	Lisa Jones	EEO Specialist	0260	GS-14	202-622-0315	<a href="mailto:Lisa.Jones@treasury.gov">Lisa.Jones@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>
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>
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>
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>
MD-715 Program Manager	Alicia Whittington	EEO Specialist	0260	GS-15	202-927-1093	<a href="mailto:Alicia.Whittington@treasury.gov">Alicia.Whittington@treasury.gov</a>

**PART D.1 - List of Subordinate Components Covered in This Report**

<b>Subordinate Component</b>	<b>City</b>	<b>State</b>	<b>Country (Optional)</b>	<b>CPDF Code (xxxx)</b>	<b>FIPS Code</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

**PART D.2 - Forms/Documents Included with This Report**

<b>Is the following Form or Document Uploaded?</b>	<b>(Please respond "Yes" or "No")</b>	<b>Comments</b>
PART F - Statement of Establishment of Continuing EEO Programs	Yes	
Organizational Chart	Yes	
EEO Policy Statement	Yes	
Strategic Plan	Yes	
Anti-Harassment Policy and Procedures	Yes	
Reasonable Accommodation 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	Yes	
Diversity and Inclusion Plan under Executive Order 13583	Yes	
Diversity Policy Statement	Yes	
Human Capital Strategic Plan	Yes	
EEO Strategic Plan	Yes	
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	Yes	



## **PART E: EXECUTIVE SUMMARY**



## **EXECUTIVE SUMMARY TABLE OF CONTENTS**

<b>Introduction</b>	<b>Page 9</b>
<b>Essential Element A: Demonstrated Commitment from Treasury Leadership</b>	<b>Page 12</b>
<b>Essential Element B: Integration of EEO into the Strategic Mission</b>	<b>Page 13</b>
<b>Essential Element C: Management and Program Accountability</b>	<b>Page 18</b>
<b>Essential Element D: Proactive Prevention of Unlawful Discrimination</b>	<b>Page 22</b>
<b>Essential Element E: Efficiency</b>	<b>Page 25</b>
<b>Essential Element F: Responsiveness and Legal Compliance</b>	<b>Page 27</b>
<b>Workforce Demographics</b>	<b>Page 28</b>
<b>Disability Program</b>	<b>Page 33</b>
<b>Veteran Employment Program</b>	<b>Page 35</b>
<b>External Civil Rights Program</b>	<b>Page 37</b>
<b>Accomplishments</b>	<b>Page 38</b>
<b>Planned Activities/Conclusion</b>	<b>Page 41</b>



### **Introduction/Mission**

This report covers the period of October 1, 2016, through September 30, 2017, and highlights Treasury's accomplishments during Fiscal Year (FY) 2017 in attaining and maintaining a model EEO Program.

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

Throughout its rich history, Treasury's core mission has not changed. With more than 95,000 employees, Treasury continues to be the leader in safeguarding and growing the U. S. economy – taking in revenue, paying bills, and, when appropriate, borrowing and investing public funds.

We continue to invest in our people by providing them purpose, motivation, support and a fair and inclusive work environment in which every individual can excel. We also take full advantage of information technology to maximize the use of sharing data to enhance sound decision-making.

### **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.

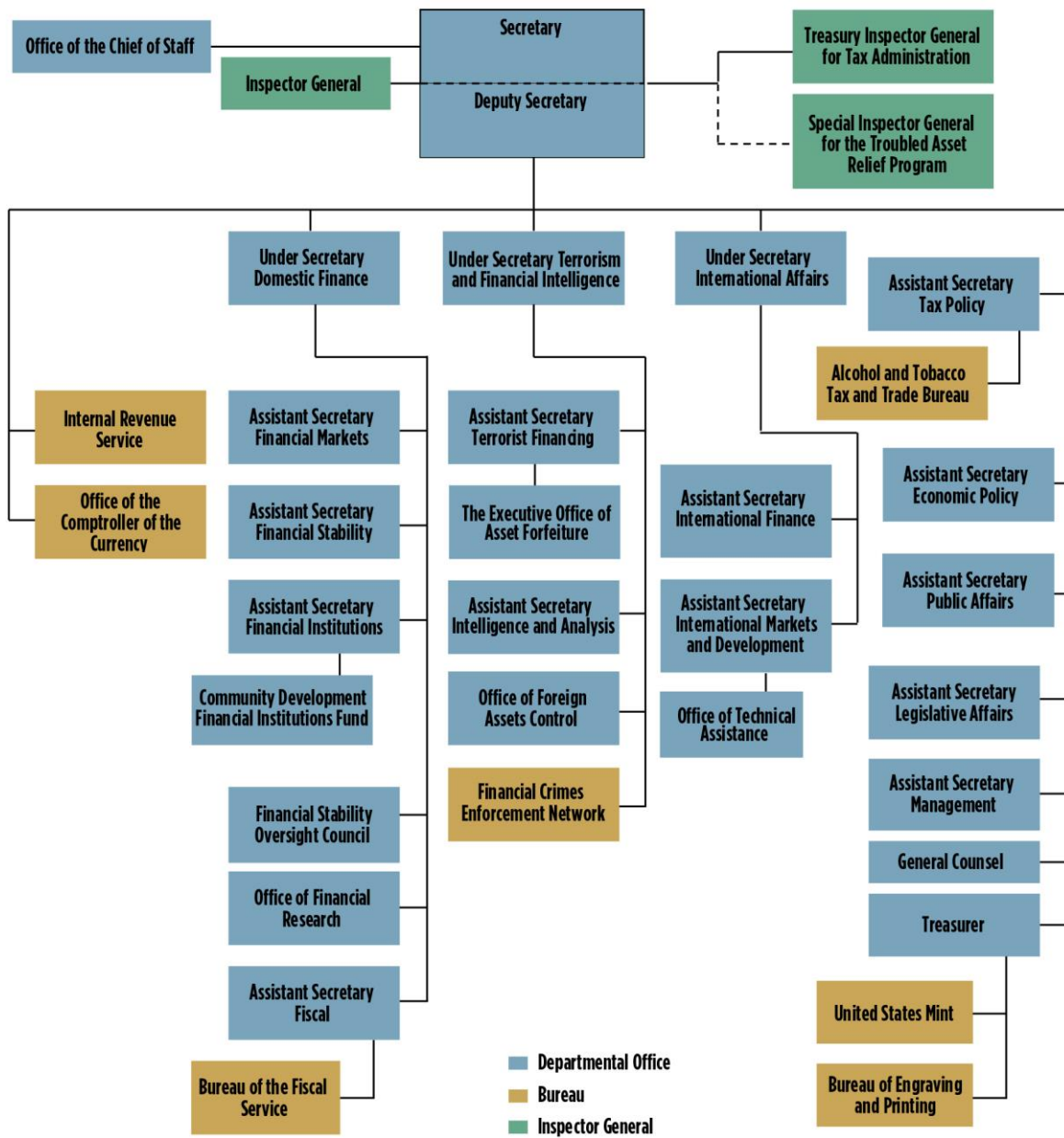
### **Organizational Reporting Structure**

For Management Directive (MD) 715 reporting purposes, Treasury's second level reporting bureaus are:

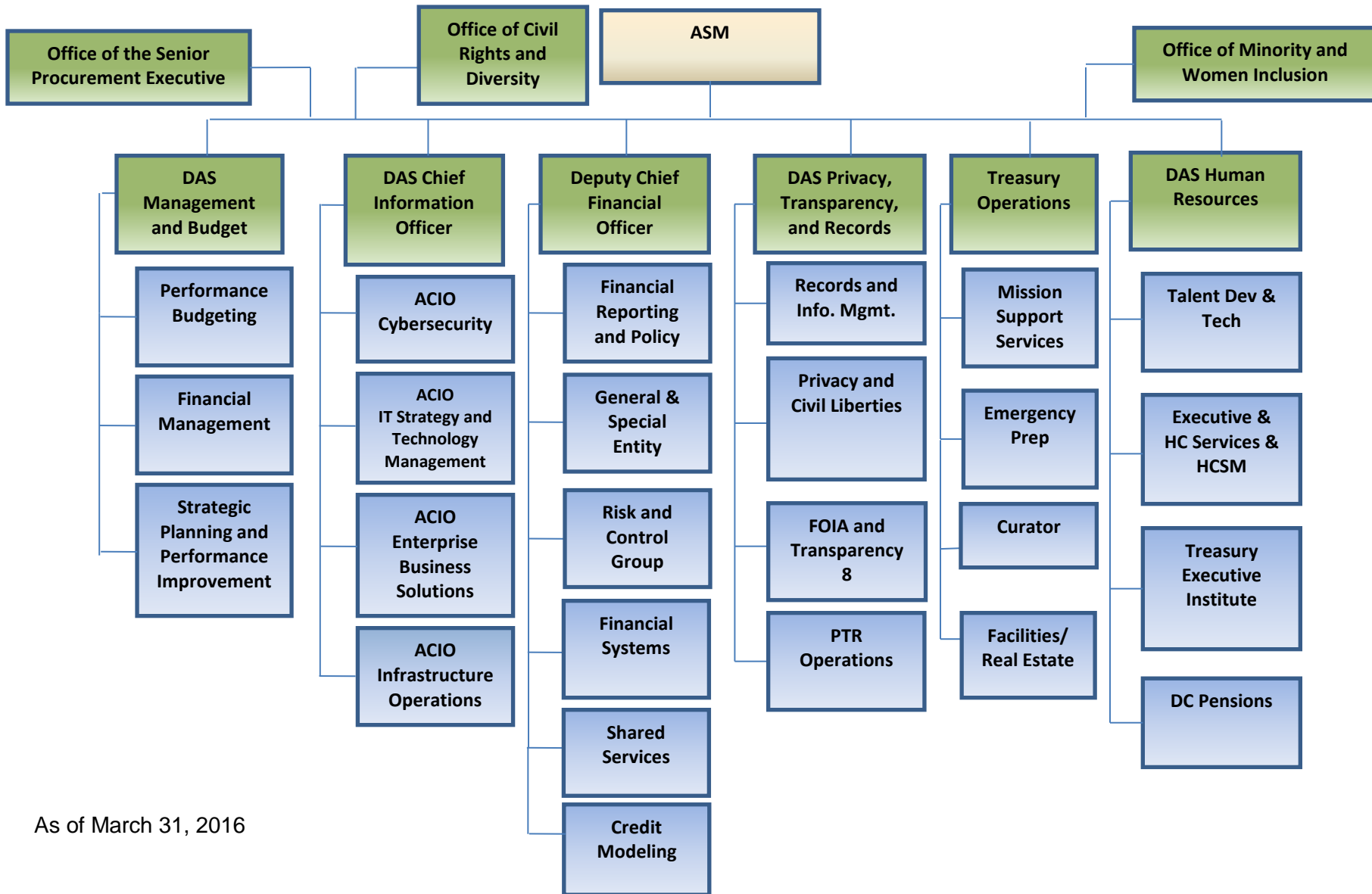
- Bureau of Engraving and Printing (BEP)
- Fiscal Service (FS)
- Departmental Offices (DO)
- Internal Revenue Service (IRS)
- Internal Revenue Service Office of the Chief Counsel (IRS-CC)
- Office of the Comptroller of the Currency (OCC) and
- U.S. Mint

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 (OCRD). These bureaus are Financial Crimes Enforcement Network (FinCEN), the Office of the Inspector General (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 (OCRD), part of the Departmental Offices' organizational structure, is primarily responsible for providing guidance and oversight to the bureau EEO offices.

## The Department of the Treasury FY 2017 Organizational Chart



## The Assistant Secretary for Management FY 2017 Organizational Chart



As of March 31, 2016

**The Office of Civil Rights and Diversity**

OCRD administers the Department-wide equal employment opportunity and diversity (EEO) 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, OCRD oversees Treasury's external civil rights efforts to ensure non-discrimination in programs operated or funded by the Department of the Treasury. The 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.

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

**Six Essential Elements of a Model EEO Program**

The following sections of this report contain an evaluation of Treasury's EEO programs against the six essential elements of a Model EEO program, as established by MD-715.

**Essential Element A: Demonstrated Commitment from Treasury Leadership**

Steven Terner Mnuchin was confirmed by the United States Senate on February 13, 2017, to serve as the 77<sup>th</sup> Secretary of the Treasury. Secretary Mnuchin affirmed his commitment to EEO by issuing his inaugural EEO policy statement on May 31, 2017. The Secretary also issued his Diversity and Inclusion Statement to all

Treasury employees on November 17, 2017 and invited employees to personalize their own commitment to Diversity and inclusion with a Diversity and Inclusion Certificate. The EEO policy, along with the Secretary's Diversity Statement, express the Department's support of diversity, equal employment opportunity and a workplace free of discriminatory harassment.



The EEO policy and Diversity statement were communicated to all Treasury employees via email and on the Treasury rotary on its internal website and are posted on both the intranet and internet. Each of Treasury's bureau heads has committed to the principles of EEO and diversity by either issuing or reissuing their policy statements in support of EEO and diversity. Each bureau also ensures that its own EEO policy and Treasury's EEO policy are disseminated to all new employees during orientation and are available on the intranet and public internet site if applicable.

Each bureau ensures all newly promoted managers and supervisors receive copies of both the bureau and Treasury EEO policies as a reminder of their role and responsibility in providing a discrimination and harassment-free work environment. Treasury's policies, orders and directives on EEO matters can be found on Treasury's public internet site located at: <https://www.treasury.gov/about/organizational->



[structure/offices/Mgt/Documents/FY%202017.EEO%20Policy%20FY2017%20Draft%203.30.17.pdf](http://www.treasury.gov/about/organization/al-structure/offices/Mgt/Documents/FY%202017.EEO%20Policy%20FY2017%20Draft%203.30.17.pdf)

Treasury and its bureaus also make written materials available to all employees and applicants, informing them of the variety of EEO programs and administrative and judicial remedial procedures available to them through our internet and intranet sites. OCRD's internet site is located at:

<http://www.treasury.gov/about/organization/al-structure/offices/Pages/Office-of-Civil-Rights-and-Diversity.aspx>.

Each Treasury bureau maintains its own performance appraisal form for managers and supervisors. The Department has a standard evaluation form for the Senior Executive Service that all bureaus are required to utilize and the SES performance plan incorporates the required critical element that evaluates SES commitment to Treasury's EEO and diversity policies and principles.

In addition, the Department's EEO Officers standard performance includes an evaluation of the EEO Officer's efforts to build and create a diverse workforce, increase the participation rate of persons with disabilities and create an inclusive work environment.

Treasury's Reasonable Accommodation policy and procedures are current and easily accessible to all employees and applicants via our internal and external websites. OCRD has posted a copy of its current policy and procedures to its websites at: [http://www.treasury.gov/about/organization/alstructure/offices/Mgt/Pages/eeo\\_policy.aspx](http://www.treasury.gov/about/organization/alstructure/offices/Mgt/Pages/eeo_policy.aspx)

### **Essential Element B: Integration of EEO into the Strategic Mission**

The Secretary has delegated authority over all EEO matters to the Assistant Secretary for Management (ASM) through Treasury Order 102-02 located at:

<http://www.treasury.gov/about/role-of-treasury/orders-directives/Pages/to102-02.aspx>.

The ASM, who reports directly to the Secretary and Deputy Secretary, is kept abreast of EEO matters through meetings with the Director of OCRD. The Director of the OCRD, who reports directly to the ASM, provides the day-to-day management of the Equal Employment Opportunity, Civil Rights and Diversity programs in Treasury, and has direct access to the ASM to provide him with critical information regarding these programs. In addition, the Director of OCRD has regular bi-weekly meetings with the ASM on the status of EEO programs.

### **Department of the Treasury Strategic Plan**

Through Treasury's Strategic Plan for Fiscal Years 2014 - 2017, the Department continued to prioritize the importance of building and maintaining a high-performing and diverse workforce. Achieving these objectives demands a concerted commitment on the part of everyone in Treasury to continuous improvement in skills, learning, processes, attitudes and organizational culture. Goal five of the Department's Strategic Plan outlines four objectives to help the department meet its plan.

- Objective 5.1: Increase workforce engagement, performance, and diversity by instilling excellence, innovation and inclusion in Treasury's organizational culture and business practices.
- Objective 5.2: Support effective, data driven decision-making and

## Office of Civil Rights and Diversity

encourage transparency through intelligent gathering, analysis, sharing, use and dissemination of information.

- Objective 5.3: Promote efficient use of resources through shared services, strategic sourcing, streamlined business processes and accountability.
- Objective 5.4: Create a culture of service through relentless pursuit of customer value.

The Department is now in the process of finalizing its FY 2018 – 2022 Treasury Strategic Plan.

### Department of the Treasury Human Capital Strategic Plan

To support the Department in meeting its strategic goals as set forth in the Treasury Strategic Plan for Fiscal Years 2014-2017, the Treasury Human Capital Advisory Council (HCAC) developed the FY 2014-2017 Treasury Human Capital Strategic Plan (HCSP). The HCSP addresses future workforce demands and challenges and establishes specific human capital management strategies, objectives, indicators, and initiatives to meet them. While the Treasury Strategic Plan outlines the agency-wide goals and measures for fulfilling the Department's operational mission, the HCSP specifically focuses on five human capital strategic goals.

- Improve Effectiveness, Efficiency, and Customer Interaction in the delivery of human capital services.
- Increase Workforce Engagement: Enable employees to work more effectively toward organizational goals.
- Increase Workforce Performance: Develop leaders and managers who improve organizational performance by positively motivating and

## FY 2017 MD-715 Report

engaging people to meet and exceed goals.

- Increase Workforce Diversity: Build and sustain an inclusive environment in which all people are treated fairly and have opportunities to excel.
- Pursue Continuous Improvement: Create a 21st Century approach to human capital management in government.

### Department of the Treasury Strategic Diversity and Inclusion Plan

Commitment and accountability are the hallmarks of a successful effort to build and maintain an inclusive and diverse, high-quality workforce. A commitment to equal opportunity, diversity, and inclusion is critical to accomplishing the mission of the Department.

Therefore, the Department's FY 2017-2020 Inclusive Diversity Strategic Plan focuses on leadership engagement, inclusion and collaboration, and optimizing inclusive diversity efforts through data-driven approaches. Our priority over the next few years focuses on informing leaders about the business case of inclusive diversity to enable them to create and maintain a work environment that attracts the widest pool of talent and provides opportunities for all employees to contribute their different perspectives, ideas, and solutions that ultimately impact the success of the Department.

As a result, we have identified as a top priority assisting leaders in understanding the benefits of diversity and inclusion and building a workforce based on these principles. We developed indicators that will assist in measuring the success of policies, procedures, and practices that provide opportunities for all employees and ensure everyone is treated with dignity and respect.



The Inclusive Diversity Strategic Plan focuses on three key goals: 1) Diversify the Workforce through Active Engagement of Leadership, 2) Include and Engage Everyone in the Workplace; and 3) Optimize Inclusive Diversity Efforts Using Data-Driven Approaches.

As part of the Office of Personnel Management's (OPM) oversight over agency Diversity and Inclusion programs, a Diversity and Inclusion – IQ Index was developed. The IQ Index provides agencies with a metric for evaluating the effectiveness of their Diversity and Inclusion Plans. The Diversity and Inclusion IQ Index focuses on five categories using questions from the Federal Employee Viewpoint Survey (FEVS) responses: Fairness, Open-minded, Cooperative, Supportive and Empowerment (FOCSE).

### **Diversity and Inclusion IQ Index**

In FY 2017, Treasury received an overall Diversity and Inclusion score of 62 percent; above the government-wide average of 60 percent. This represents a 2 percent increase from FY 2016 where Treasury received a 60 percent overall score.

Treasury had an increase in the overall response rates for employees in each category of the IQ Index; Supportive (from 80% to 81%), Open (from 58% to 60%), Cooperative (from 57% to 60%), Empowerment (from 56% to 57%) and Fairness (from 49% to 50%). While these results were not considered areas of significant weakness, they do represent an opportunity for continued improvement for the Department and its bureaus.

While Treasury has noted progress in improving response rates in all the areas of the IQ Index, our lowest score fell within the category of Fairness (from 49% to

50%). The Department considers employee responses in the area of Fairness to be the most concerning. Therefore, in FY 2018, Treasury and its bureaus will continue to focus efforts towards developing plans to improve employee responses in the Fairness category.

In conjunction with the Department's Diversity and Inclusion Strategic Plan, each of the Department's bureaus maintained its own implementation plan. Throughout FY 2017, OCRD's Diversity and Inclusion Program Manager met with bureau EEO, Diversity and Human Resource Officers to discuss the bureau's implementation plan and recommend strategies for continued improvement. Together we will continue to focus efforts on continuing to improve Treasury's overall results for FY 2018.

### **Project Career**

In FY 2017, Treasury implemented a new program called Project Career - Designing Your Future; a new initiative that focuses on showcasing a variety of tools and resources on My Treasury to help employees chart their path to personal and professional success.

The initial series focused on coaching and how employees could utilize a coach to help improve productivity, satisfaction with life and work, and attainment of relevant goals. The series emphasized that coaching is a key part of management and employee development activities and is championed by the Treasury Executive Institute.

Future series will include articles, tips and tool focusing on education and training opportunities, as well as work-life balance programs and benefits.

**Treasury Executive Institute Coaching – Putting You First for Excellence**

As a service to support Treasury employee growth and development, the Treasury Executive Institute (TEI) continued to offer individual coaching services in FY 2017. To ensure quality of service, all TEI coaches have completed, or are in the process of completing, certification through the International Coaching Federation (ICF).

TEI's coaching services provide an excellent way to assist employees in achieving their professional goals to go to the next level by: reviewing 360 feedback results; solving individual leadership challenges; excelling in self-awareness and self-management; gaining clarity in decision making and purpose; and/or developing leadership attributes and behaviors of empathy, self-disclosure, active listening, and giving and receiving feedback.

TEI coaching can be provided in various formats that include:

- **One-on-One Coaching** - This offering can be conducted face-to-face or virtually.
- **Peer Cohorts** - This offering is an excellent strategy for building leadership skills, collaboration, learning, and effective use of questions in a group setting.
- **Continuing Coach Education Series** - This session focuses on building coaching skills. The programs are specific one-day workshops offered by marketplace leaders and available to all TEI cadre coaches.
- **Coaching Skills for Managers Workshops** - Coaching is a powerful tool for any manager seeking to develop others in a

learning organization and to maximize employee performance and engagement.

- **Coach Training** - In exchange for the coach training, each individual agrees to serve on TEI's internal coaching cadre and provide approximately 10 hours per month of pro-bono coaching to employees in TEI participating agencies and bureaus for 24 months after beginning the coaching program. TEI manages the matching of the coaches and clients. This program is open to GS-14's (and equivalents) and above.

In FY 2017, TEI had 116 certified and active coaches on hand who provided 1,956 coaching hours to 350 employees of which 114 were Treasury employees.

**Internship Programs**

In past years, internship programs have played a significant role in ensuring that a diverse pipeline of talent is available to fill mission critical occupations being vacated by an aging workforce.

Throughout FY 2017 Treasury and its bureaus have continued to establish and maintain partnerships with existing external internship programs that attract highly qualified, educated and diverse students. Internship programs such as the Pathways Program, Hispanic Association of Colleges and Universities' (HACU) Hispanic Serving Institutes National Internship Program (HSINIP), the International Leadership Foundation (ILF), INROADS, Operation Warfighter, the Washington Internship Program for Native Students (WINS), the Workforce Recruitment Program (WRP), and the Washington Center continue to provide Treasury and its bureaus an avenue to identify and expand the pool of potential candidates to fill

mission critical vacancies and to grow new talent.

However, with continuing budget constraints, transformation requirements and limited hiring or hiring freezes, many of the Treasury bureaus have been faced with limited funding for internship opportunities. Nonetheless, the Department and its bureaus continued to fund internship opportunities whenever possible, but on a more limited scale compared to past years.

### **Hispanic Serving Institutions National Internship Program (HSINIP)**

As a way to develop a pipeline of Hispanic employees, Treasury has maintained its partnership with HACU's Hispanic Serving Institutions National Internship Program (HSINIP). Viewed as a cornerstone of diversity recruitment, the HSINIP aims to increase employment opportunities for Hispanic students throughout the federal government.

During FY 2017, Treasury placed four (fall, spring, and summer) HACU interns in IRS, OCC and Mint.

### **International Leadership Foundation (ILF)**

Since FY 2005, Treasury has partnered with the International Leadership Foundation (ILF) to provide Asian American Students exposure to public service. The ILF is a non-profit organization which gives scholarships to Asian American college students and places them in public service internships to help prepare them to become tomorrow's leaders.

During FY 2017, Treasury placed eight ILF students in FS.

### **The Washington Center for Internships (TWC)**

The Washington Center for Internships (TWC) is an independent, non-profit organization serving hundreds of colleges and universities in the United States by providing students challenging opportunities to work and learn in Washington, D.C.

During FY 2017, Treasury placed 15 TWC interns in DO and OCC.

### **INROADS Program**

The INROADS program assists agencies in accessing diverse talent through early identification and continuous leadership development of outstanding students. Through its unique leadership development process, INROADS assists agencies with anticipating business needs and identifying quality diverse employees who can contribute to meeting agencies' mission needs.

During FY 2017, Treasury placed 26 (fall, spring, and summer) INROADS interns in DO and OCC.

### **Operation Warfighter**

Operation Warfighter (OWF) is a temporary assignment/internship program, developed by the Department of Defense, for service members who are convalescing at military treatment facilities (initially in the National Capitol Region but increasingly throughout the United States). The program provides recuperating service members with meaningful activity outside of the hospital environment and offers a formal means of transition back to the military or civilian workforce.

## Office of Civil Rights and Diversity

In FY 2017, Treasury hosted five interns through OWF in FS and Mint. Of the five interns, FS converted one to permanent status.

### Other Internship Programs

In FY 2017, Treasury placed 103 interns through the Pathways Program. The 103 Pathway Program participants were placed in BEP, DO, FinCEN, FS, IRS, IRS-CC, Mint, OCC, and TIGTA. Of the Pathway Program participants, 20 were converted to permanent employees.

IRS hosted four interns through the Washington Internship Institute.

Through Proxtronics Dosimetry, LLC, OCC sponsored 2 interns.

Through the Maryland Department of Rehabilitation Services (DORS), FS hosted three interns. DORS provides services to help persons with disabilities prepare for jobs and careers and assists employers in finding prescreened applicants.

Throughout FY 2017, IRS-CC sponsored 29 interns through its Summer Legal Program available to second year law students. Through developmental assignments, the program provides exposure to IRS-CC and enables law students to work under the supervision of experienced tax lawyers.

During FY 2017, IRS hosted 30 Veteran interns as part of its non-paid veteran work experience program. This program serves as a great recruitment tool for hiring veterans, of the 30 veteran interns, six veterans and one student veteran were converted to permanent employees.

In FY 2017, through programs like the DC Summer Youth Employment Program and the Marion Barry Summer Youth

## FY 2017 MD-715 Report

Employment Program, IRS, IRS-CC and Mint hosted 130 youth between the ages of 14 to 21 with enriching and constructive summer work experiences.

Through other non-paid internship opportunities, Treasury hosted an additional 47 interns in FS, FinCEN, IRS-CC and TIGTA.

Finally, OCC sponsored 11 interns through its District Financial Internship Program for Entry Level Examiner Program. Of the 11 interns, OCC converted six to permanent employees.

### Essential Element C: Management and Program Accountability

Treasury exercises program oversight and accountability of bureau programs in accordance with Treasury's policy on Departmental Oversight of Management Functions (HCIS 250.1), which authorizes the ASM and the Departmental Functional Program Heads to establish Department-wide strategic goals and objectives, as well as individual performance expectations and uniform language, to be incorporated into the performance plans of Bureau Functional Program Heads (CXOs) such as the bureau EEO Officers. The CXO policy calls for the ASM to participate in the recruitment, selection, retention and performance alignment of bureau management officials to include bureau EEO/Diversity Officers.

As a result of the implementation of this policy, significant benefits for both Treasury and the bureaus in FY 2017 resulted in:

- increased collaboration,
- greater transparency of information, data, goals, and plans,
- more efficient sharing of resources, and

- greater emphasis on succession planning, including more effective recruitment and selection leading to better qualified hires.

The Department also continued to enhance the EEO community's access to relevant workforce data by providing quarterly workforce data tables as well as conducting quarterly data reviews to enhance the accuracy of Treasury's workforce data.

Throughout FY 2017, OCRD's subject matter experts (SME) continued to participate as data stewards, working in conjunction with other Department SME's and the Enterprise Data Management team to enhance the Department's Data Dictionary, recognized by OPM as a best practice in FY 2016. The Data Dictionary gives standardized definitions for all fields of personnel data and lists all associated OPM, NFC and or HR Connect codes for data contained in the Department's Workforce Analytics tool. This ensures all users have the same understanding of the data and are able to pull and analyze the proper data relevant to the desired analysis projects.

However, the automated diversity dashboards that OCRD began working on at the end of FY 2016 have been put on hold due to lack of funding in FY 2017. OCRD is hopeful funding will be available for the dashboard project in FY 2018. Once funding becomes available, OCRD will continue the process of developing automated dashboards that will enhance Treasury and bureau leadership's knowledge of the state of their workforce, help identify any areas of potential concern and provide insight towards identifying where new or additional strategies may be warranted to improve overall workforce diversity and inclusion.

## **Exit Survey Tool and Analysis**

Now in its eighth year, Treasury continued the use of its automated Exit Survey tool deployed in FY 2010. The Exit Survey results are a valuable source for guiding bureau HR and EEO staff as well as managers towards identifying potential barriers in the areas of retention, career advancement, professional development, and provision of reasonable accommodations.

During the reporting period a total of 10,205<sup>1</sup> employees separated from Treasury; 9,004<sup>2</sup> were permanent employees and 1,201 were temporary. From those separations, 8,942 were voluntary; 8,306 permanent and 636 temporary. From the voluntarily separating employees, we received a total of 2,303 (28%) responses. Of the 2,303 responses, 98% (2,248) were permanent/seasonal employees, of whom 9% (202) were persons with disabilities and 17% (371) were veterans; 2% (55) were temporary employees<sup>3</sup>.

While Whites represent 55% of the Department's total permanent workforce, Whites represented 58% of the separating permanent/seasonal employees and 67% of the respondents who took the Exit Survey. Males represent 38% of the Department's total permanent workforce, 36% of the separating permanent/seasonal employees and 40% of those who took the Exit Survey.

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<sup>1</sup> Data does not include those employees separating from the office of the Special Inspector General for the Troubled Asset Relief Program (26) or the Office of the Inspector General (8).

<sup>2</sup> Data on separations was provided by Workforce Analytics. Data snapshot is as of pay period 19, September 30, 2017.

<sup>3</sup> No analysis was conducted on the temporary employees because the number of respondents (55) is insufficient for conducting a statistically significant analysis.



We also note that separating permanent/seasonal employees tended to be older; 76% of the permanent/seasonal respondents to the Exit Survey reported being 50 years of age or older and 53% indicated their length of service was more than 25 years. This is not an unexpected result as the reason most frequently cited for separating permanent/seasonal respondents was retirement (1,522 out of 2,248 or 68%). Additionally, 20% or 441, identified they were leaving due to a promotion, transfer or accepting a position at another Federal/State Agency, non-profit or private sector organization and 6% or 125, identified resigning for other reasons not listed. Less than 1% of the voluntarily separating permanent/seasonal employees cited "Other" (47) as to why they were leaving.

A high proportion of departing employees identified their Treasury work experience as positive (83% of permanent/seasonal employees). However, a significant percentage (62%) of permanent/seasonal employees reported job related stress was not manageable, 41% indicated that their workload was not reasonable, 44% indicated resources were not available to do their job, and their pay level in relation to their jobs. Additionally, 55% indicated that the morale in their office was not good.

Departing permanent/seasonal employees responded favorably overall to most questions related to work experience. However, a significant number of responses from departing permanent/seasonal employees concerned career growth: having the opportunity to participate in decisions (45%) and access to career development opportunities (43%).

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.

During the period of October 1, 2016 through September 30, 2017, 371 permanent/seasonal veterans responded to the Department's Exit Survey. Overall responses from veterans mirrored the overall permanent/seasonal employee responses in that, 37% (136) had more than 25 years of service, and 72% (267) were age 50 or older. The most frequently cited reason for separation of veterans was retirement (216 or 58%), transferring, promotion or accepting a position in the private sector, another federal agency or Treasury bureau (97 or 26%) and other (7 or 2%).

The factor most frequently cited by veterans for their decision to leave was job related stress (58%). Additional factors frequently cited included office morale (54%), ability to participate in decision making (47%), pay in relationship to job responsibilities (44%) and access to developmental opportunities (42%). 80% of the respondents indicated their work experience was generally positive and 69% stated they would recommend Treasury as a good place to work. Additionally, 63% of the separating veterans said they would be interested in returning to work for Treasury.

### **FY 2017 Employee Viewpoint Survey**

The 2017 Federal Employee Viewpoint Survey (FEVS) was administered by the Office of Personnel Management (OPM) between May 2 and June 13, 2017. As with previous years, the 2017 survey was a full census, administered to all eligible employees, defined as full- or part-time, permanent, non-political, and non-seasonal employees onboard as of October 31, 2016.

Treasury's 2017 response rate was 58 percent with 46,368 out of 79,744 eligible employees responding. As in the previous year, the Department's response rate remained significantly higher than the FY 2017 government-wide rate of 46 percent.

The FEVS includes a total of 98 questions, of which 71 measure federal employees' perceptions about how effectively agencies manage their workforce; 13 are specific to employees participating in work/life programs; and 14 relate to demographic information.

OPM considers items with a positive rating of 65 percent or more as an organizational strength and 35 percent or less as a weakness. The FY 2017 FEVS

results reflected that none of the question responses showed a decline in positive response rates, in fact, 90 percent of the questions showed an increase in positive response rates. This includes increases in all three 2017 Treasury-wide engagement strategy focus area questions (questions 23, 53 and 71<sup>4</sup>). Notably, question 71, related to employee satisfaction, increased by four percentage points, from 55 percent in FY 2016 to 59 percent in FY 2017.

The 2017 results also showed that Treasury continued to leverage its areas of strength to help improve employee sentiment across the Department. All three strength area focus questions (questions 42, 49 and 56<sup>5</sup>) showed increases in positive response rates; including a significant increase of two points related to supporting employee work/life balance (question 42). One of the ways Treasury gauges survey results about employee perceptions and engagement is to look at the overall response rates for Engagement (68 percent) and Satisfaction (64 percent). In FY 2017, overall response rates for Engagement was slightly above the government rate of 67 percent, while Satisfaction at Treasury is slightly below the government-wide average of 65 percent. However, it is clear that based on Treasury employees' responses, they continue to remain committed to the mission, are willing to give extra to get the job done and are proud of the quality of their work. Treasury

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<sup>4</sup> Question 23: In my work unit, steps are taken to deal with a poor performer who cannot or will not improve. Question 53: In my organization, leaders generate high levels of motivation and commitment in the workforce. Question 71: Considering everything, how satisfied are you with your organization.

<sup>5</sup> Question 42: My supervisor supports my need to balance work and other life issues. Question 49: My supervisor/team leader treats me with respect. Question 56: Manager communicates the goals and priorities of the organization.

employees also had positive responses to questions regarding their immediate supervisors – a key strength Treasury leverages as part of its engagement strategy.

**Moving Forward: FEVS Engagement Plans**

To support Treasury and its bureaus efforts to continue to improve overall FEVS results through employee engagement, DASHR-CHCO is developing the Department's Employee Engagement Policy to be issued in FY 2018. The policy will provide guidance to support and coordinate efforts of the Department of the Treasury and its Bureaus to strengthen an organizational culture of employee engagement and recognize employees' achievements in accordance with priorities that are being established in the Treasury FY 2018 – 2022 Strategic Plan.

DASHR-CHCO will also be working with Treasury's bureaus on improving existing training and mentoring programs and opportunities, improve on-boarding programs, maximize employee performance by tracking implementation of Treasury's non-Senior Executive Service performance management policy, providing supervisory tools, meaningful employee recognition and conducting employee focused meetings such as roadshows, listening sessions and town halls.

DASHR-CHCO is also working with the OCIO office to create and produce automated dashboards that will enhance Treasury and bureau leadership's ability to make data driven decisions and develop plans to improve employee engagement. The test environment will be available to users starting November 2017.

**Partnership for Public Service *Best Places to Work in the Federal Government* Rankings**

Designed to help a broad audience of government leaders, employees and job seekers, the *Best Places to Work in the Federal Government* rankings draw on responses from civil servants who complete the FEVS to produce a detailed view of employee satisfaction and commitment across federal agencies and subcomponents. Employee satisfaction and commitment are two necessary ingredients in developing high-performing organizations and attracting top talent. The *Best Places to Work* rankings are an important tool for ensuring that employee satisfaction is a top priority for managers and leaders. The rankings provide a mechanism to hold leaders accountable for the health of their organizations; serve as an early warning sign for agencies in trouble; offer a roadmap for improvement; and give job seekers insights into how federal employees view their agencies.

The Partnership for Public Service uses data from the Office of Personnel Management's [Federal Employee Viewpoint Survey](#) to rank agencies and their subcomponents according to a *Best Places to Work* index score.

In FY 2017, the Department was ranked 14<sup>th</sup> among 18 large agencies, as compared to ranking 15<sup>th</sup> place last year.

Agencies are ranked according to overall employee engagement, as well as on additional categories such as leadership, strategic management, innovation, and work-life balance. PPS uses a slightly different formula for calculating its categories than OPM uses for FEVS indices. Below are some highlights (minus



results from FinCEN, TTB, and OIG<sup>6</sup>) from the FY 2017 overall results:

- All Treasury bureaus increased their BPTW ranking. Most Treasury bureaus improved overall scores from 2016, except for DO which had a decrease of 2.1 points.
- Treasury increased across all PPS Category Scores, with increases of more than two points in Pay (3.4 points, # 16/18), Support for Diversity (3.0 points, #11/18), Empowerment (2.2 points, #15/18), and Strategic Management (2.1 points, #16/18).
- We continue to rank among the top agencies in employee opinion about their immediate supervisor (#4/18). Treasury is also among the top ten in Teamwork (#7/18) and Fairness (#9/18).

### **Essential Element D: Proactive Prevention of Unlawful Discrimination**

#### **Special Emphasis Programs**

As previously mentioned, OCRD is part of Departmental Offices and provides policy, oversight and technical guidance to Treasury bureaus to include special emphasis program (SEP) areas. SEPs provide a framework for incorporating EEO principles of fairness and equal opportunity into the fabric of the Department and its bureaus, across the employment spectrum. Established throughout the bureaus, the three federally mandated SEPs -- the

Hispanic Employment Program, the Federal Women's Program and the Persons with Disabilities Program -- reflect the Department's commitment to equal opportunity, dignity, and respect.

At their discretion, individual bureaus have also established other SEPs such as African-American, Asian American/Pacific Islander, American Indian/Alaska Native employment programs and Lesbian Bisexual Gay and Transgender employment programs.

Bureau SEP Managers and Coordinators serve as resource persons or advisors to the bureau EEO offices on the unique concerns of the particular constituent group and support the internship programs and other partnerships discussed previously.

At the end of FY 2017, OCRD launched Prism, a Treasury-wide Employee Resource Group focused on lesbian, gay, bisexual, transgender and queer (LGBTQ) employees and their allies. Prism is an employee-driven group that supports professional development, group mentoring, training, and retention of LGBTQ employees. Prism will provide a safe environment where LGBTQ and ally employees can actively engage in discussions of shared issues or concerns that help to promote an engaged workforce and uncover issues that are specific to the needs of the LGBTQ community. And like all of our employee resource groups, all Treasury employees are welcome to join.

Additionally, Treasury was one of 31 Federal agencies that participated in the 24th annual Federal Inter-Agency observance to honor the Days of Remembrance. The program, "Evade and Endure: Survivors Stories," was designed to provide eyewitness testimony to the horrors of the Holocaust and share the stories of survivors who have made meaningful

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<sup>6</sup> While OPM provided government-wide and agency data from its 2017 Federal Employee Viewpoint Survey (FEVS), it withheld information on 186 small agencies and subcomponents until early December. This impacted PPS's ability to include these organizations in the 2017 rankings released. OPM has since released the data, and Partnership plans to release small agency rankings in early 2018.

## Office of Civil Rights and Diversity

contributions to society while overcoming evil. This year's speakers included Roman Kent, survivor of the Lodz Ghetto, Auschwitz and other concentrations camps and a leading voice on behalf of all Holocaust survivors and Renee Fink, one of the 12 "Hidden Child" representatives of the N.C. Holocaust Speakers Bureau.

OCRDRD Also provided LGBTQ Cultural Competency training on an ad-hoc basis throughout FY 2017. The course covered sex discrimination protections under Title VII of the Civil Rights Act. OCRDRD held eight sessions with IRS employees, managers and soon-to-be SES leaders in their Candidate Development Program, reaching 120 employees. OCRDRD also held one session with the Bureau of Engraving and Printing for 80 employees and managers, which was recorded for future use. Similar information on sex discrimination related protections was released in a policy statement in December 2016 and sent as a Manager's Alert to all Treasury managers in March FY 2017.

In September, OCRDRD partnered with the IRS to provide a panelist for the annual White House Initiative on Historically Black Colleges and Universities HBCU Week conference to discuss Treasury internship opportunities with HBCU students.

### Treasury-wide Diversity Training Events

In FY 2017, Treasury's Executive Institute (TEI) established a curriculum and hosted a variety of training sessions for Treasury employees and managers geared towards enhancing knowledge of diversity and inclusion with additional emphasis on leveraging diversity through leadership development and conflict management. These sessions included the following seminars:

## FY 2017 MD-715 Report

- Suspending Judgement: A Key to Being Culturally Competent
- SES: How to Get There and Succeed Once There
- Managing Conflict: A Problem Solving Approach
- The NextGen Leader
- A Key to Being Culturally Competent
- Harvard Business Simulations: Managing Difficult Conversations
- Engaging with Honor: Building a Culture of Courageous Accountability
- Moving Beyond Diversity: The Case for Inclusive Leadership
- Engaging Employees: Cultivating Your Organizational Culture
- Permission to Speak Freely: How the Best Leaders Cultivate a Culture of Candor
- Leveraging the Power of Diversity to Achieve Breakthroughs
- A Winning Culture in Government
- The Harvard Business Review Way of Resolving Conflict
- We Can't Talk About That at Work! How to Talk about Race, Religion, Politics, and Other Polarizing Topics
- Inviting Innovation
- Earning It: Hard-Won Lessons from Trailblazing Women at the Top of the Business World
- Leader to Leader: Exploring Success
- Empowerment: Why Me?

In April, Treasury also hosted a screening and panel discussion of "Uniquely Nasty". The documentary explores the period during which lesbian, gay, bisexual and transgender (LGBT) individuals were barred from working for the federal government and featured the stories of three individuals who shared their personal experiences during that time period.

In July, Treasury hosted a dynamic webinar, Untangling the Web Between White Women and Women of Color. The webinar was designed to be an interactive exploration of how, especially in these turbulent times, White women and women of color, regardless of age, sexual orientation and identity, title, or ability, can leverage our diversity to build individual comfort, group collaboration, and organizational synergy.

And in September, Treasury partnered with Dr. Zina Sutch, Director of Diversity and Inclusion at the Office of Personnel Management, to present a new style of seminar for the Department's senior leaders. The new series, "Understanding, Harnessing, and Leveraging the Power of Diversity & Inclusion, was launched this summer by OPM, and Treasury was one of the first agencies to participate. The training discussed how leadership must focus on people, practices and performance in order for the organization to be successful. The training provided attendees with information on why and how leaders in government can leverage diversity, create inclusive cultures and promote opportunities for all.

### **Alternative Dispute Prevention (ADR)**

Conflict that results in formal disputes is costly and disruptive to the workforce. Therefore, the Department continues to devote significant resources to resolving conflict through dispute prevention and through alternative dispute resolution (ADR) methods.

As with previous years, the Department held its annual Dispute Prevention Program hosting two webinars; C3: Communicate, Collaborate, Create, and Civil Treatment: Building an Inclusive Workplace by Addressing Unconscious Bias.

The C3 webinar highlighted trends and strategies related to conflict resolution, designed to help individuals better communicate and collaborate to create solutions. The Civil Treatment webinar addressed the effects of unconscious bias, how to promote civility and help eliminate negative behavior by creating foundational skills in support of fair and inclusive behavior.

In FY 2017, 94 percent of EEO counseling contacts were offered ADR, and 61 percent of those offered ADR participated in ADR at the informal level.

### **ADR Offered to Complainants (Informal) FY 2017**

<b>Total Completed Counseling</b>	<b>722</b>
<b>Total ADR Offered</b>	<b>678</b>
<b>Total Accepted</b>	<b>434</b>
<b>Offer Rate</b>	<b>94%</b>
<b>Acceptance Rate</b>	<b>61%</b>

In the formal complaint process, during FY 2017, the Department achieved an 88 percent ADR offer rate and 9 percent of complainants offered ADR participated in ADR.

### **ADR Offered to Complainants (Formal) FY 2017**

<b>Formal Closed Complaints</b>	<b>381</b>
<b>Total ADR Offered</b>	<b>334</b>
<b>Total Accepted</b>	<b>35</b>
<b>Offer Rate</b>	<b>88%</b>
<b>Acceptance Rate</b>	<b>9%</b>

In an effort to increase participation in ADR at the formal stage of the complaint process, in FY 2018, OCRD will incorporate new language into its Formal Complaint forms to encourage employees

to participate in the formal ADR process even though they may not have been able to resolve the complaint through ADR at the informal stage of the complaint process.

### **Shared Neutrals Program**

Through the Treasury Shared Neutrals (TSN) Program, Treasury maintains a nationwide cadre of certified and highly trained neutrals (also known as mediators). TSN mediators are employees from various organizations trained in the art of mediation who voluntarily serve on a collateral-duty basis. Their objective is to assist bureaus in resolving all types of workplace disputes at the earliest stages of the conflict and to provide a resolution through mediation, facilitation, and coaching.

During FY 2017, TSN completed a total of 274 mediations. Of these 274 mediations, TSN mediators successfully resolved 114 (45 percent) disputes. On November 1, 2017, the TSN mediation coordination functions for the Department transitioned to the United States Mint. The Mint will serve in this role for the next two fiscal years.

### **Essential Element E: Efficiency**

Treasury has sufficient staffing, funding and authority to comply with the time frames established in EEOC regulations (29 CFR §1614) for processing EEO complaints of employment discrimination. Treasury promotes and utilizes an efficient and fair dispute resolution process and has a system in place for evaluating the impact and effectiveness of the Department's EEO complaint processing program. Treasury's complaint management system, I-Trak, continues to provide greater Department-wide tracking and case management capabilities for both the formal and informal complaint process.

As noted above, OCRD tracks all EEO complaints filed by Treasury employees and applicants for employment with an integrated data management complaint system (ITRAK or iComplaints). OCRD contracts with Micropact to serve as the systems administrator for the iComplaints system. In June 2016, a security assessment of Micropact identified six risk deficiencies. Treasury's OCIO reviewed and remedied all six associated risks by February 2017. The most significant risk, identified through the security assessment, was remedied with OCRD and OCIO signing an accepted risk memo on October 2016, which stated the business need for the iComplaints login to support both ID/password authentication. Additionally, in order to improve on the timely completion of Treasury's investigations in FY 2017, OCRD made the decision to directly download investigative reports from the "cloud" that USPS offers to its clients. The decision to download directly from the cloud meant that OCRD would no longer have to wait (for a minimum of least two weeks) for the investigative reports to reach us through the mail. This change not only vastly improved the timeliness of our investigations it also reduced overall costs. In fact, at the end of FY 2017, Treasury noted a 12 percent improvement in the timeliness of our investigations (from 78% in FY 2016 to 90% in FY 2017).

### **Discrimination Complaints**

In the area of discrimination complaints, OCRD is responsible for providing authoritative advice to bureau EEO staff and for processing all administrative EEO complaints based on race, color, national origin, religion, sex (including sexual orientation, gender identity and pregnancy), age, disability, protected genetic information, reprisal and parental status. OCRD also develops complaint policies

## Office of Civil Rights and Diversity

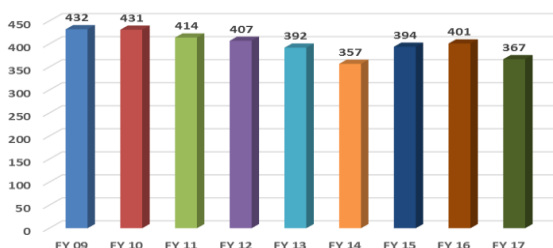
and procedures and produces high quality final agency decisions. In addition, OCRD oversees the Department's appeal process, tracks all appeal decisions, and monitors compliance with decisions issued by the EEOC.

The Department also has special procedures for handling complaints on the basis of parental status. This basis was added in response to a Presidential Executive Order.

### Complaint Activity

Treasury timely submitted the EEOC 462 Report in October 2017. The 462 Report is an annual assessment of the agency's formal and informal complaints, and of avenues used to resolve issues prior to and during the complaint process.

During FY 2017, the number of EEO complaints filed by Treasury employees and applicants (367) decreased by eight percent from the number of complaints filed in FY 2016 (401).



\* Prior to FY 2010, protected genetic information complaints were processed under the Department's modified procedures. Since the passing of the Genetic Information Non-Discrimination Act (GINA) in November 2009, these complaints have been processed as EEO complaints in the statutory complaint process.

At the close of FY 2016, Treasury had 707 complaints pending that were carried over to FY 2017. During FY 2017, 367 complaints were filed, four cases (one of which was of a complaint that was filed in FY 2017) were remanded back to the agency by the EEOC and Treasury closed 380 complaints.

## FY 2017 MD-715 Report

In FY 2017, the Department's bureaus timely completed 94 percent of EEO counselings.

By the end of FY 2017, the Department completed 314 investigations. There were 184 investigations (59 percent) completed within 180 days, 127 (40 percent) completed between 181-360 days and 3 (one percent) were completed in 361 or more days. Because time frames are extended under certain situations, 90 percent (284) of all investigations were timely completed, a significant improvement over the 78 percent timely completed in FY 2016.

In FY 2017, Treasury issued 205 final agency decisions in cases where a hearing was not requested. Of these decisions, 159 were merit decisions and 46 were procedural dismissals. In FY 2017, there were six findings of discrimination. Overall in FY 2017, Treasury processed 159 merit decisions within an average of 44 processing days, which is below the 60 processing days mandated by EEOC. 92 percent (146) of those merit decisions were timely issued within 60 days of receipt of the decision request. Treasury also issued 76 final agency actions in cases with an administrative judge's decision (i.e., cases where a hearing was requested); one involved a finding of discrimination.

At the end of FY 2017, Treasury had 697 complaints pending. Pending complaints can be at the acknowledgement, investigation, hearing or final agency decision stages.

At the end of FY 2017, 21 percent of pending complaints were at the investigation stage. Seventy percent were pending a hearing before an EEOC



Administrative Judge<sup>7</sup>. A total of 41 (6 percent) of the complaints remained pending in the final agency decision/action phase with the remaining 17 (2 percent) pending decision to accept/dismiss.

At Treasury, the most frequently cited bases for complaints are reprisal, age, and disability, and the most frequently cited issues are harassment (non-sexual), performance evaluation/appraisal, and disciplinary action.

The percentage of Treasury employees who filed formal EEO complaints decreased slightly from 0.37 percent of the workforce in FY 2016 (373 complainants) to 0.36 percent in FY 2017 (348 complainants).

In May 2017, Treasury received a feedback letter from the EEOC that identified that the reversal rate of procedural dismissals issued by the Department had increased from 22% in FY 2014 to 33% in FY 2016. EEOC recommended Treasury devise a plan to decrease the reversal rate. OCRD reviewed the FY 2017 data and determined the reversal rate of dismissals adjudicated by EEOC in FY 2017 was 28% (4 of 14), a 5 percentage point decrease from the FY 2016 rate. While it is difficult for only 4 reversals to have a common theme, the Department will provide appropriate language to the bureau EEO Counselors for use in more clearly informing complainants of the effect of refusal to participate in the EEO counseling process. In addition, OCRD will discuss with our complaint staff how the analysis of one of the dismissals could have been improved.

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<sup>7</sup> Case decisions pending before an EEOC administrative judge are outside the control of the agency.

## **Essential Element F: Responsiveness and Legal Compliance**

Treasury is in compliance with the law, including EEOC regulations, directives, orders and other instructions. The Department has posted all required No Fear Act information, provided the required training, and consistently filed timely MD-715 and EEOC Form 462 reports as well as other reports required by EEOC and OPM.

Treasury conducted its mandatory biennial No Fear Act Training in FY 2016. The next biennial required training will be in FY 2018.

## **Agency/Bureau State of the Agency MD-715 Briefings**

During FY 2017, the Department conducted its FY 2016 State of the Agency Briefing with senior leadership in January 2017. After the submission of Treasury's FY 2017 MD-715 report, OCRD plans to brief senior leadership on the Department's status in maintaining a model EEO Program during FY 2018.

The Department also continued to hold its one-on-one briefings with each of its bureaus in an effort to improve the mutual understanding of bureau program deficiencies and workforce triggers /barriers. As previously noted each bureau, regardless of its size, has its own distinct reporting structure for its EEO and HR offices and establishes its own policy and procedures regarding the hiring, recruitment, retention and professional development of employees. Therefore, the required barrier analysis must be completed at the bureau level. These briefings provide a forum for OCRD and bureau EEO staffs to dialogue about possible internal and external factors that may be contributing to triggers/barriers, recommend the direction of the bureau barrier analysis and identify

corporate strategies that may assist bureaus in determining if workplace barriers exist.

In FY 2017, OCRD continued with its standard practice of providing bureau leadership with feedback on the preparation of their previous year's annual MD-715 report. However for the last two years, our team's focus has been on reviewing and providing recommendations to enhance the bureaus' barrier analysis efforts and preparations of required PART I's. In many cases, the team found that the analysis was too broad to identify the actual barrier, and resulted in recommendations on ways to refine and target the root cause analysis to more accurately identify if a potential barrier existed.

### **Treasury Pay Gap Analysis**

During FY 2017, OCRD conducted a Treasury Pay Gap Analysis. The impetus was government-wide pay equality studies issued by the Office of Personnel Management (OPM) calling on federal agencies to analyze their pay data. In consultation with the Deputy Assistant Secretary for Human Resources and the Office of Minority and Women Inclusion for the Departmental Offices, OCRD reached out to OPM, which agreed to provide raw data from its data files on "occupational groups" within Treasury, the same data set used by OPM in its studies. However, after review of that data and further discussion with the Office of Microeconomic Policy (OMEP), it was determined that the Department would benefit most from a deeper analysis based on an examination by actual occupation. Because OPM would not supply data at that level, OCRD pulled data on specific occupations from the Department's Workforce Analytics System. Where there were a sufficient number of employees (100 males in the occupation), the analysis was conducted separately for non-IRS and IRS

employees; otherwise, the analysis is based on a combination of IRS and non-IRS employees.

After a thorough analysis, we were pleased to find substantial equity in pay between females and males at the Department. When common and well-accepted statistical models are applied at a granular level, the Department's pay gap for females is only 2.8 percent. (While it would be unwise to ignore any gap, absolute parity is statistically unlikely.)

At the Department:

- Pay-setting authorities for female and male new hires are very similarly applied.
- Female starting salaries for White-collar employees in all pay plans were 93.2 percent of male starting salaries.
- Quality Step Increases are equitably awarded, with females slightly more likely to receive one.
- Promotions are equitably distributed, with males slightly more likely to receive one.
- For 30 of the 39 occupations analyzed, the pay gap is under five percent; seven occupations reflect a higher pay for women.

Accordingly, we concluded that this analysis establishes that pay setting methods are equitably applied within the Department and that there is no adverse impact on either gender. However, it is cautioned that there still may be individual instances where a specific pay setting was inequitable. The Department plans on repeating this analysis within five years to ensure that the results remain stable or improve.

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**Workforce Demographics**

The MD-715 report contains information on Treasury's workforce demographics over the period of FY 2008 to FY 2017<sup>8</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 and the Senior Executive Service and equivalent pay plans (OR, TR, IR and NB), Hispanics and persons with targeted disabilities (PWTD).

Throughout most of FY 2017, 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 to either conduct meaningful analysis or evaluate previously established plans to determine their effectiveness.

Additionally, for a cabinet level agency the size of Treasury, it is impractical to expect any demographic data to change by more than a percent in a single fiscal year. Indeed, such 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 (see bureau MD-715 Reports for analysis and PART I's associated with bureau specific triggers/ barrier analysis), Treasury has noted significant progress in increased participation rates for women and

minorities in SES positions as well as the feeder pools and for the overall participation rate for Hispanics and PWD and PWTD.

As of the end of FY 2017, the permanent workforce participation rate of Hispanics was 11.44 percent. This is an overall increase of 2 percent when compared to the 9.63 percent participation rate noted in FY 2008. This participation rate is above both the CLF (9.96 percent) and RCLF (8.50 percent) availability rates.

**Participation Rates in the Permanent Workforce**

As of the close of FY 2017, Treasury had 94,751 permanent employees<sup>9</sup>, a decrease of 3,660 (-3.72 percent net change) employees from FY 2016. This decrease is primarily due to reduced budgets which have significantly limited or reduced hiring opportunities for many of Treasury's bureaus in FY 2017.

Treasury and its bureaus continue to utilize the Relevant Civilian Labor Force (RCLF) tool updated at the end of FY 2017, which provides a more realistic benchmark comparator based on the overall occupational composition of the Department's total workforce. Treasury identified all the occupations within the Department's workforce, pulled the relevant occupational CLF's and identified availability rates for each occupation to determine the proper weight each occupation should be given in order to determine the overall RCLF to compare to the Department's workforce. The weighting of the actual availability rate of each occupation in the labor force is the most critical part of determining the appropriate

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<sup>8</sup> Enterprise Data Management System, Treasury's system of record, maintains employment data that covers a rolling period of 10 years. Beginning in FY 2017 data for trend analysis was available for FY 2008 through FY 2017.

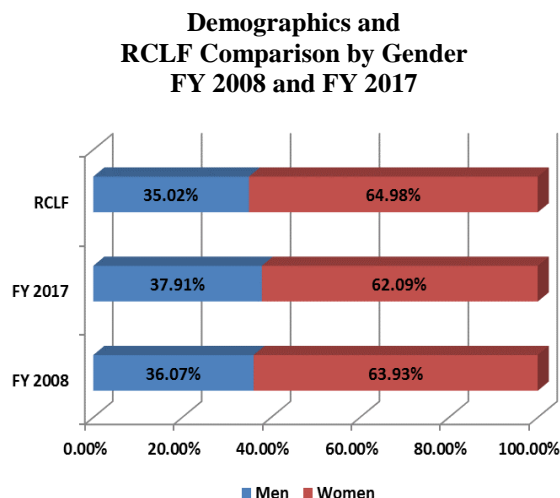
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<sup>9</sup> For purposes of analysis, non-appropriated fund employees are included in the workforce totals as permanent or temporary employees depending on status.

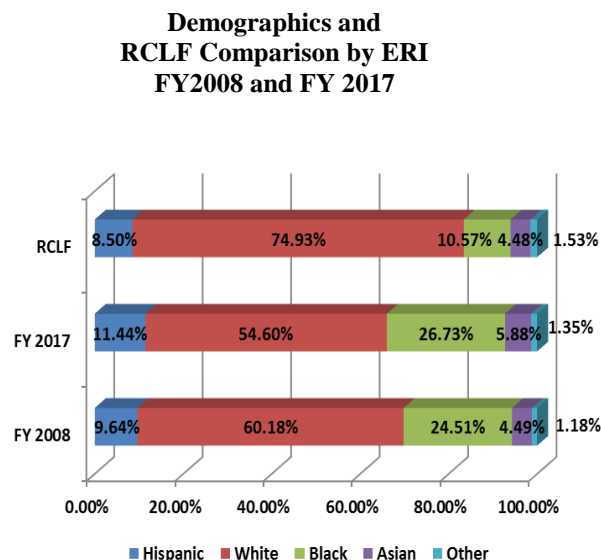


bench mark. For example secretaries comprise approximately 0.56 percent of the civilian workforce but the RCLF availability rate for secretaries is 96.1 percent women. If not properly weighted based on the 0.56 percent availability rate in the workforce, it could give a very misleading comparator as to what the representation of women could be. As a result, Treasury now has a more realistic comparator for availability rates by ethnicity race indicator (ERI) and gender based solely on those occupations employed at the Department.

A comparison of FY 2017 participation rates in Treasury's permanent workforce for men and women shows little change from FY 2007. However, based on the RCLF availability rates, we see that women (62.09 percent compared to 64.98 percent RCLF) and men (37.91 percent compared to 35.02 percent RCLF) are participating at rates very close to their RCLF availability rates. And 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 2008, Treasury's permanent workforce was 60.55 percent White and 39.35 percent non-White. In FY 2017, the participation rate for Whites decreased to 55.64 percent of the workforce and non-Whites increased to 44.36 percent. Thus, Treasury has noted a significant positive trend in the increased participation rate for non-Whites in the overall workforce. In fact, Hispanics (11.44 percent compared to 8.50 percent RCLF), Blacks (26.73 percent compared to 10.57 percent RCLF), Asians (5.88 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 (0.83 percent compared to 0.89 percent RCLF) are participating at rates very close to their availability rates. Whites (54.60 percent compared to 74.93 percent) and Two or More Races (0.35 percent compared to 0.51 percent RCLF) are the only groups participating at rates below their RCLF availability rates.

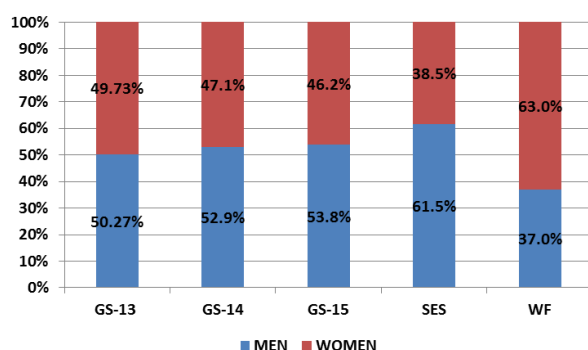
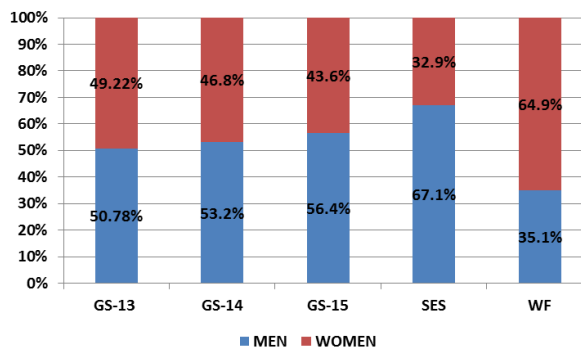


\* Other includes employees who are American Indian Alaska Natives, Native Hawaiian or Other Pacific Islanders and Two or More Races

**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 2008, Treasury has seen a significant increased participation rate for women in the GS-13 through GS-15 grades and in SES positions.

At the GS-13 grade level, the participation rate for women increased by 0.57 percent, from 49.22 percent in FY 2008 to 49.73 percent in FY 2017. At the GS-14 grade level, the participation rate for women increased by 0.30 percent, from 46.8 percent in FY 2008 to 47.1 percent in FY 2017. At the GS-15 grade level, the participation rate for women increased by 2.6 percent, from 43.6 percent in FY 2008 to 46.2 percent in FY 2017. And at the SES level, the participation rate for women increased by 5.6 percent, from 32.9 percent in FY 2008 to 38.5 percent in FY 2017.

**FY 2017 Grade Distribution by Gender****FY 2008 Grade Distribution by Gender**

At the GS-13 grade level, the participation rate for Hispanics increased by 1.03 percent, from 6.06 percent in FY 2008 to 7.09 percent in FY 2017. At the GS-14 grade level, the participation rate for Hispanics increased by 1.51 percent, from 4.41 percent in FY 2008 to 5.93 percent in FY 2017. At the GS-15 grade level, the participation rate for Hispanics increased by 1.11 percent, from 3.72 percent in FY 2008 to 4.83 percent in FY 2017. And at the SES level, the participation rate for Hispanics increased by 0.69 percent, from 2.73 percent in FY 2008 to 3.42 percent in FY 2017.

At the GS-13 grade level, the participation rate for Blacks increased by 2.63 percent, from 18.30 percent in FY 2008 to 20.93 percent in FY 2017. At the GS-14 grade level, the participation rate for Blacks increased by 2.41 percent, from 17.44 percent in FY 2008 to 19.85 percent in FY 2017. At the GS-15 grade level, the participation rate for Blacks increased by 1.98 percent, from 14.61 percent in FY 2008 to 16.59 percent in FY 2017. And at the SES level, the participation rate for Blacks increased by 1.51 percent, from 9.82 percent in FY 2008 to 11.33 percent in FY 2017.

At the GS-13 grade level, the participation rate for Asians increased by 2.56 percent, from 6.74 percent in FY 2008 to 9.30 percent in FY 2017. At the GS-14 grade

## Office of Civil Rights and Diversity

level, the participation rate for Asians increased by 4.57 percent, from 5.32 percent in FY 2008 to 9.89 percent in FY 2017. At the GS-15 grade level, the participation rate for Asians increased by 3.61 percent, from 3.75 percent in FY 2008 to 7.36 percent in FY 2017. And at the SES level, the participation rate for Asians increased by 0.14 percent, from 3.82 percent in FY 2008 to 3.96 percent in FY 2017.

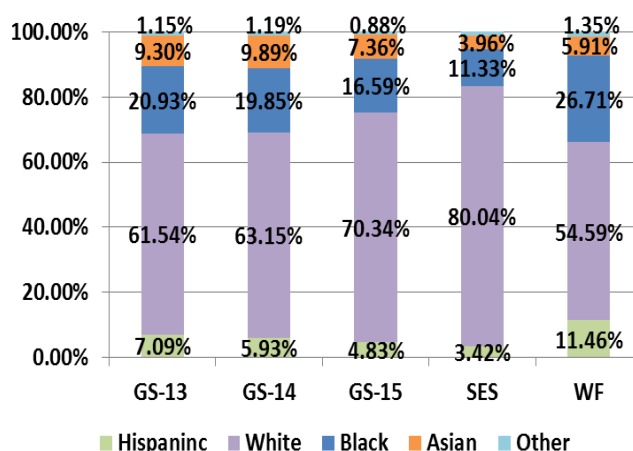
At the GS-13 grade level, the participation rate for Others<sup>10</sup> increased by 0.10 percent, from 1.05 percent in FY 2008 to 1.15 percent in FY 2017. At the GS-14 grade level, the participation rate for Others increased by 0.09 percent, from 1.10 percent in FY 2008 to 1.19 percent in FY 2017. At the GS-15 grade level, the participation rate for Others increased by 0.29 percent, from 0.59 percent in FY 2008 to 0.88 percent in FY 2017. Currently, there are no Other at the SES level.

Because we have a trend of increased participation for all the non-White groups in the feeder pools and SES positions, it is then 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 -6.30 percent, from 67.84 percent in FY 2008 to 61.54 percent in FY 2017. At the GS-14 grade level, the participation rate for Whites decreased by -8.58 percent, from 71.73 percent in FY 2008 to 63.15 percent in FY 2017. At the GS-15 grade level, the participation rate for Whites decreased by -6.98 percent, from 77.32 percent in FY 2008 to 70.34 percent in FY 2017. And at the SES level, the participation rate for Whites decreased by -3.05 percent, from 83.09 percent in FY 2008 to 80.04 percent in FY 2017.

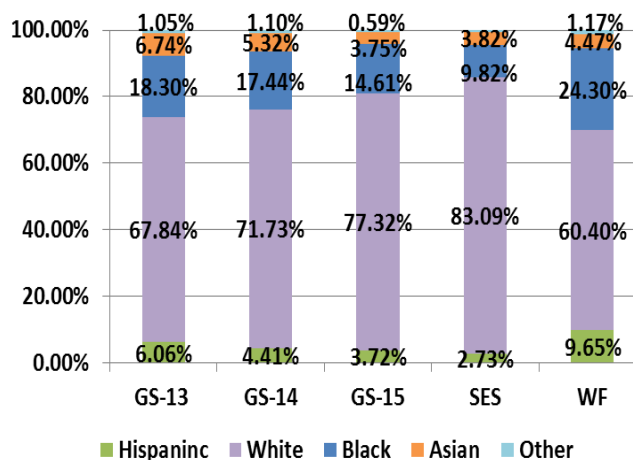
<sup>10</sup> Others includes those groups that are represented at a rate less than one percent of the Treasury workforce (AIAN, NHOPI, and two or More Races).

## FY 2017 MD-715 Report

FY 2017 Grade Distribution by White and Non-White



FY 2008 Grade Distribution by White and Non-White



It is important to note that when Treasury looks at Treasury-wide data as a whole, the progress noted may not be an accurate reflection of the true progress of each bureau. In fact, the consolidated view of the data may mask where potential barriers may 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 has expressed the expectation to the bureaus that they are required to complete detailed analysis to determine if any EEO groups are facing a potential glass ceiling, blocked pipeline or glass wall and based on their findings, complete any associated

PART I's for submission with their bureau MD-715 reports. Additionally with the release of the joint EEOC/OPM memorandum issued January 18, 2017, Treasury informed all of our bureaus that they were required to conduct a more focused barrier analysis on the participation rates for Hispanics within the major occupations distribution in the general schedule (GS) grades 12 through SES levels to identify and eradicate any barriers to equal employment opportunity (EEO), consistent with the merit system principles and applicable laws.

Additionally, in FY 2015/2016, Office of Civil Rights (OCRD) and the Deputy Assistant Secretary for Human Resources and Chief Human Capital Officer (DASHR CHCO) conduct a review of the diversity of the Department's Senior Executive Service (SES) corps and the processes for selecting new executives compared to FY 2010 and FY 2005.

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 planned activities for completion in FY 2017 had to be modified for completion in FY 2018. (See Treasury PART I for modified completion dates.)

**Disability Employment Program**

In April 2017, the OPM revised its SF-256, Identification of Disability. The revised SF-256 significantly changed the way agencies count and track persons with disabilities (PWD) and persons with targeted disabilities (PWTD) by incorporating new codes, improved definitions and broader categories of disabilities and serious health conditions.

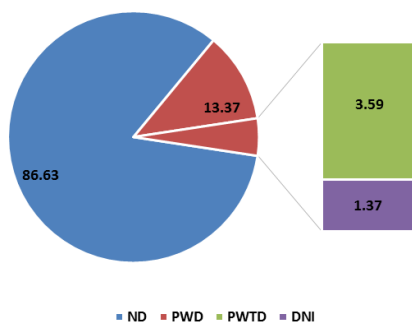
To ensure Treasury was in compliance with the new coding established with OPM's new SF-256 form for tracking PWD and PWTD in its workforce, OCRD worked closely with Enterprise Data Management (EDM) to institute a crosswalk within workforce Analytics, Treasury's data analytics system for analyzing workforce 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 identified themselves as not having a disability as a PWD.

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.

## Office of Civil Rights and Diversity

As a result of the implementation of the new coding in OPM's revised SF-256 and the Departments resurvey efforts, Treasury had a significant increase in the participation rates for both PWD and PWTD in its permanent workforce. In its FY 2016 MD-715 Report, Treasury reported a permanent workforce participation rate of 9.74 percent for PWD and 1.78 percent for PWTD. However at the end of FY 2017, Treasury is pleased to note that we have exceeded the new FY 2018 goals of a 12 percent participation rate for PWD (13.37 percent) and the sub goal of 2 percent for PWTD (3.59 percent). Many of Treasury bureaus have also either met or exceeded the new goals:

### FY 2017 Participation Rate for PWTD



## FY 2017 MD-715 Report

### FY 2017 Disability Participation Rates By Bureau (Permanent)

Bureau	TOTAL	PWD #	PWD %	PWTD #	PWTD %
BEP	1802	255	14.15%	33	1.83%
FS	3543	792	22.35%	144	4.06%
DO	1866	224	12.00%	37	1.98%
FinCEN	268	46	17.16%	13	4.85%
IRS	78240	10277	13.07%	2970	3.80%
IRS-CC	1744	217	12.44%	47	2.40%
Mint	1578	333	21.10%	58	3.68%
OCC	3930	383	9.75%	79	2.01%
OIG	167	30	17.96%	5	2.99%
SIGT <sup>11</sup>	124	17	13.70%	2	1.61%
TIGTA	789	65	8.24%	5	0.63%
TTB	483	75	15.53%	10	2.07%
<b>TOTAL</b>	<b>94751</b>	<b>12664</b>	<b>13.37%</b>	<b>3403</b>	<b>3.59%</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 sub-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 (14.15%) and PWTD (4.56%) 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

<sup>11</sup> For Treasury's IG's (OIG, SIGT, and TIGTA), an overall look at disabilities is misleading as these bureaus employ a significant number of employees in the 1811 (criminal investigating) occupation that have specific occupational employment criteria that preclude the employment some PWD and PWTD. If that occupation is excluded from the overall workforce counts for those bureaus, they would have significantly higher participation rates (OIG: 19.08% PWD, 3.82% PWTD; SIGT: 15.59% PWD, 2.60% PWTD; TIGTA: 9.58% PWD, 0.98% PWTD).



percent participation rate at the GS-11 and above grades levels. However, the participation rates for PWD (9.8%) at the GS-11 and above is slightly below the 12 percent goal, indicating there is still work to be done. (See Treasury PART J for more detailed information.)

In FY 2017, OCRD continued to conduct its “Be a Champion” 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 Representative 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 2017, OCRD conducted roadshows for managers and supervisors at the Mint, IRS, and TTB.

At the end of FY 2017, Treasury implemented the process of utilizing OPM’s Talent Portal located on USAJobs as a resume mining database for PWD and Veterans. Using the Talent Portal will provide Treasury and its bureaus’ hiring managers’ access to resumes of qualified candidates with disabilities and veterans. The use of this tool assists Treasury in meeting its participation rate goals and encourages the use of special hiring authorities such as Schedule A and the hiring authority for veterans with 30% or more compensable disability.

The Veteran and Disability Program Managers also created a “Be a Champion” video that many of Treasury’s bureaus have

incorporated into their new supervisor training curriculum.

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.

### **Veteran Employment Program**

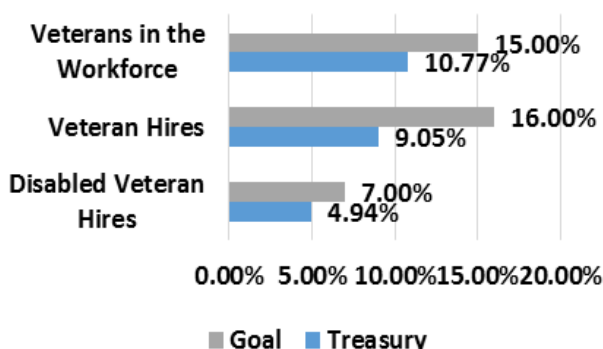
Treasury is committed to achieving a workforce that includes those who have served in the defense of our country. In FY 2017, bureaus retained a designated bureau Veteran Employment Representative (VER) to support the Treasury Veterans Employment Program Office (VEPO) with recruitment, hiring and retention of veteran employees. The Department expanded the VEPO services by establishing a Veterans Employment Program Coordinator (VEPC) position to facilitate a more interactive veteran consultation program for veterans and disabled veterans seeking employment. The IRS maintained a full-time position for a VEPO program manager, extending the Department’s program execution efforts to its largest bureau; IRS held monthly stakeholder meetings with all field components and offices.

While the Office of Personnel Management (OPM) did not establish veterans hiring or retention goals in FY 2017, Treasury maintained its prior fiscal year’s numerical goals based on OPM’s End of Year Group Results by agency size (20k -100k). The FY 2017 goals for the Department: Veterans in the Workforce (15%), Veteran Hires (16%), and Disabled Veteran Hires (7%). Though

## Office of Civil Rights and Diversity

Treasury did not meet its goals, nine bureaus exceeded the 7 percent hiring goal: the Bureau of Engraving and Printing, Financial Crimes Enforcement Network, Bureau of Fiscal Service, IRS Chief Counsel, U.S. Mint, Office of the Inspector General, the Office of the Special Inspector General for the Troubled Asset Relief Program, the Treasury Inspector General for Tax Administration and Alcohol and Tobacco Tax and Trade Bureau.

### FY 2017 New Veteran Hires



The employment of veterans, including disabled veterans, continued to be a focus of the Department's Human Capital Advisory Council (HCAC). Treasury EEO, HR, D&I, and Talent and Engagement communities met on a quarterly basis to discuss strategies to support Veteran Employment Initiatives. The Department uses numerous strategies to support the recruitment, outreach, career development, and retention of its veterans, including:

- Hiring fairs hosted by agencies including the Department of Defense and the Maryland Department of Labor, programs including Operation Warfighter, Recruit Military, Hiring Heroes, and other events held at the state level.
- Partnerships with organizations such as the Department of Veteran Affairs (VA), VA hospitals, Department of Labor Employment

## FY 2017 MD-715 Report

Service, and private veterans' assistance centers.

- Outreach to schools included partnering with Disability and Veteran student offices as well as the OCC Campus Recruitment Program, which targets potential employees for entry-level bank positions.
- The Non-Paid Work Experience Program and paid internship opportunities through the above programs were bolstered by partnering with specific military locations such as Fort Hood.
- Other outreach resources include partnerships with Employee Resource Groups, community groups such as the Pan-Pacific American Leaders and Mentors, points of contact via e-mail and telephone for veteran applicants, online portals for Schedule A hiring, and targeted postings on social media.
- Treasury Veterans Employee Resource Group (VERG) launched a three-year plan (FY 2017 – FY 2019) aligning its goals with Treasury's Inclusive Diversity goals, including the requirements of the Disabled Veterans Affirmative Action Plan. Similarly, the IRS VEPO presented an overview of its services and DVAAP commitments to the Internal Revenue Service (IRS) veteran employee organization, Military Outreach for Service, during its semi-annual virtual training conference.
- VEPO maintains an external e-mail inbox to connect with disabled veterans to provide resume consultations to assist with their federal employment search at

Treasury and other agencies. In addition, bureaus participated in other fairs and recruitment activities.

- The Internal Revenue Service (IRS) maintains an external e-mail inbox, veteran telephone hotline, and public career website to highlight opportunities. As the Department's largest bureau, the IRS VEPO increases the Department's outreach to veterans.
- A Veteran's Focus newsletter is issued quarterly to the workforce highlighting veteran employees' success stories. In addition, the newsletter is shared with veteran candidates providing tools and resources to assist with the federal hiring process.

The Department's bureaus instituted collaborate efforts with the Selective Placement Program, Disability Employment Program Managers, Disability Management Offices, and Human Resource Practitioners. As a result, three out of 12 bureaus saw an increase in their hiring goals from FY 2016 to FY 2017, even with the hiring freeze in effect. The Agency Human Capital Plan, FY 2014-2017 and Inclusive Diversity Strategic Plan, FY 2017-2020, incorporated strategies outlined in Executive Order (E.O.) 13518. To ensure disabled veteran applicants are aware of potential job opportunities, vacancy announcements include a statement indicating that the vacancy is open to 30% or more disabled veterans. In FY 2017, the Department participated in 25 career fairs, increasing its participation rate from 20 career fairs in FY 2016.

The Department mandates that all 9,016 hiring managers and 1,697 human resources practitioners complete annual Veterans Employment Training (VET) and Uniformed Services Employment and Reemployment Rights Act (USERRA) Training. In FY17, 94% of hiring managers and 98% of human resource practitioners completed the VET, and USERRA training was completed by 96% of both groups. Bureaus provided additional ad-hoc training and tools, including webinars, online conferences, manager's toolkit, veterans employment reference guide, and leadership briefings on veteran workforce participation.

**FY 2017 Veteran Employment Performance Activity**

	Veterans in the workforce	Veteran New Hires	Disabled Veteran New Hires
BEP	31.20%	34.45%	15.13%
DO	15.28%	15.70%	6.61%
FinCEN	19.12%	47.06%	23.53%
FS	19.61%	18.75%	11.36%
IRS	9.22%	7.31%	4.15%
IRS-CC	10.85%	22.28%	9.33%
MINT	36.45%	41.18%	24.71%
OCC	8.06%	8.02%	4.20%
OIG	23.21%	26.67%	13.33%
SIGT	15.94%	19.35%	6.45%
TIGTA	17.07%	8.70%	8/70%
TTB	20.25%	17.86%	10.70%

### External Civil Rights

OCRCD ensures the Treasury bureaus are in compliance with the external civil rights laws applicable to their federally conducted and assisted programs. Treasury's nondiscrimination policy provides that individuals have equal opportunity to participate in, and receive benefits from, all programs or activities funded by the Department. To ensure compliance, OCRCD develops policy and guidance, conducts civil rights compliance reviews of Treasury programs, provides oversight and technical



## Office of Civil Rights and Diversity

assistance, and offers training to the Treasury bureaus. OCRD also processes and investigates complaints from individuals alleging discrimination in Treasury conducted or assisted programs and activities. In addition to its Treasury-wide responsibilities, OCRD also manages the external civil rights program for the Departmental Offices.

Programs offering federal financial assistance are defined as programs providing monetary or non-monetary assistance to a recipient to support a public purpose. Federal recipients are entities or organizations that receive federal financial assistance from the federal government. Federal financial assistance includes, but is not limited to, grants and loans of federal funds, donations of federal property, training, details of federal personnel, and any agreement, arrangement or other contract which has as one of its purposes the provision of assistance. A federally conducted program or activity is, in simple terms, is anything a federal agency does. Federally conducted programs include, but are not limited to, tax preparation services and tours of Treasury buildings.

OCRD has jurisdiction to process:

- Complaints alleging race, color or national origin discrimination in programs or activities receiving Treasury financial assistance may be filed pursuant to Title VI of the Civil Rights Act of 1964.
- Complaints alleging age discrimination in Treasury assisted programs may be filed pursuant to the Age Discrimination Act of 1975.
- Complaints alleging sex discrimination in Treasury assisted educational programs may be filed pursuant to Title IX of the Education Amendments of 1972.

## FY 2017 MD-715 Report

- Complaints alleging disability discrimination in programs or activities receiving financial assistance from, or conducted by the Department, may be filed pursuant to Section 504 of the Rehabilitation Act of 1973.
- Complaints alleging denial of accessibility to electronic and information technology in use by the Department may be filed pursuant to Section 508 of the Rehabilitation Act.

In FY 2017, Treasury received 30 complaints of discrimination or inquiries pertaining to the external civil rights program, compared to 31 complaints and inquiries received during FY 2016. Of the external inquiries or complaints received during FY 2017, eleven complaints were determined to fall under the jurisdiction of the Department and were accepted for investigation. OCRD issued two findings of discrimination during FY 2017.

During FY 2017, OCRD continued the work of ensuring that Treasury regulations and policies are in place. The Department's final rule implementing Title VI of the Civil Rights Act of 1964 became effective on January 12, 2017. OCRD continues to lead the Department's work to fully implement Title VI. On January 3, 2017, the Department published a Notice of Proposed Rulemaking for its regulations implementing Section 504 of the Rehabilitation Act. The Department also published its final rule implementing the Age Discrimination Act of 1975, which became effective on November 13, 2017.

OCRD continued to provide technical assistance to the bureaus including the IRS Civil Rights Unit (CRU). In FY 2017, OCRD conducted a Basic External Civil Rights Training for Treasury employees. The training covered requirements under

## Office of Civil Rights and Diversity

Title VI of the Civil Rights Act, Title IX of the Education Amendments Act of 1972, the Age Discrimination Act and Sections 504 and 508 of the Rehabilitation Act of 1973. In FY 2017, OCRD completed the first Department-wide compliance review under Title IX, and will begin the work to improve compliance as needed in FY 2018.

### Accomplishments

The Department is proud of its accomplishments towards maintaining a model EEO program in FY 2017. The accomplishments below outline our many successes throughout the reporting period:

- Developed and issued Treasury's Strategic Inclusive Diversity plan version 2.0.
- Issued a Treasury LGBT and Gender Identity non-discrimination policy.
- Required bureaus to establish new Diversity and Inclusion Implementation Plans and conducted reviews to ensure bureaus were meeting requirements outlined in the Department's Diversity and Inclusion Plan 2.0 FY 2017 - 2020.
- In collaboration with DASHR CHCO, developed an implementation plan for recommended strategies identified in the Treasury SES barrier analysis.
- Completed a gender pay gap analysis through a partnership with the Office of Microeconomic Policy following OPM's guidance in its Detailed Analysis of Government wide Data on Gender Pay Difference for White Collar Employees (September 2014).
- Issued anti-discrimination policy statement for the new Secretary.
- Hosted 582 interns Department-wide through various paid and non-

## FY 2017 MD-715 Report

paid diversity internship programs, universities and colleges.

- Updated the Treasury and bureau specific RCLF's which provide more realistic benchmark comparators based on overall occupational workforce composition at Treasury and within each of its bureaus.
- Provided each bureau with an assessment of its FY 2016 barrier analysis submitted as part of the Annual MD-715 report submissions
- Conducted one-on-one Barrier Analysis Sessions with each bureau to determine where they were in the barrier analysis process on the employment of Hispanics as required by OPM and EEOC's joint memorandum. Provided guidance and recommendations for continued analysis.
- Published quarterly EEO and Veterans newsletters which provided Treasury's EEO practitioners, managers and supervisors, as well as employees, with information on relevant complaint issues, workforce statistics and important upcoming agency events/activities.
- Updated Disability Workforce data tables to ensure data reflected new disability codes and methodology required by OPM's new SF-256 which collects disability information from employees and applicants for employment
- Distributed bi-annual Treasury-wide dashboards to keep Bureau Heads and other Treasury leaders current on the state of Treasury's workforce and progress in meeting the established FY 2017 disability and veteran hiring goals.
- Hosted a screening and panel discussion of the film "Uniquely Nasty".

## Office of Civil Rights and Diversity

- Hosted a dynamic webinar, Untangling the Web Between White Women and Women of Color.
- Partnered with Dr. Zina Sutch, Director of Diversity and Inclusion at the Office of Personnel Management, to present a new style of seminar for the Department's senior leaders. The new series, "Understanding, Harnessing, and Leveraging the Power of Diversity & Inclusion, was launched this summer by OPM, and Treasury was one of the first agencies to participate.
- Launched Prism, a Treasury-wide Employee Resource Group focused on lesbian, gay, bisexual, transgender and queer (LGBTQ) employees and their allies.
- Participated in the 24th annual Federal Inter-Agency observance to honor the Days of Remembrance.
- Conducted three "Be a Champion Roadshows", providing coaching for managers at TTB, Mint and IRS.
- Developed a commemorative webpage to bring awareness to all Special Emphasis Program Heritage Months and activities.
- Exceeded the EEOC's new FY 2018 goal that 12 percent of all new permanent hires be PWD (13.37<sup>12</sup> percent) and the sub goal that 2 percent be PWTD (3.5 percent).
- Provided eight hours of refresher training to Treasury Shared Neutral's current mediator cadre members.
- Offered two workforce webinar trainings: *C3-Conflict Resolution Series* was conducted by the Federal Mediation and Conciliation

## FY 2017 MD-715 Report

Service (FMCS) and featured experts renowned in their field discussing trends and strategies related to conflict resolution designed to help individuals better communicate and collaborate to create solutions. The second was *Civil Treatment®: Building an Inclusive Workplace by Addressing Unconscious Bias*, which address the effects of unconscious bias in the workplace -- what unconscious bias is and its potential ramifications to individuals and organizations.

- Provided 40 hours of new mediator training for 21 employees who applied to become part of the TSN mediator cadre.
- Completed a total of 274 mediations and successfully resolved 114 (45%) of these completed mediations.
- Transitioned the TSN Administrator functions from the IRS to the US Mint.
- Issued the final rule implementing Title VI of the Civil Rights Act of 1964, effective on January 12, 2017.
- Published a Notice of Proposed Rulemaking for Treasury's rules implementing Section 504 of the Rehabilitation Act of 1973 on January 3, 2017.
- Published Treasury's final rule implementing the Age Discrimination Act of 1975, which became effective on November 13, 2017.
- Conducted Basic External Civil Rights Training for Treasury employees. The training covered requirements under Title VI of the Civil Rights Act, Title IX of the Education Amendments Act of 1972, the Age Discrimination Act and Sections 504 and 508 of the Rehabilitation Act of 1973.

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<sup>12</sup> Participation rate for PWD includes those employees (1.37 percent) who do not wish to self-identify their disability or severe health condition.

## Office of Civil Rights and Diversity

- Completed a Treasury-wide Title IX compliance review.
- Conducted an accessibility review of the DO leased spaces at 1750 Pennsylvania Avenue N.W.
- Hired an Equal Opportunity Specialist for the DO External Civil Rights Program.
- Drafted and submitted for internal comments the Treasury Title VI Guidance for Recipients.
- Reissued two civil rights complaint policies under the newly created Civil Rights and Diversity Issuance System.
- Began utilizing the Talent Portal located within OPM's USAJobs portal for managing resumes for Veterans and PWD/PWTD.

### Planned Activities/Conclusion

The Office of Civil Rights and Diversity's FY 2017 MD-715 Report outlines our successes in our equal opportunity programs and activities. The Department of Treasury is proud of its accomplishments in the areas of attracting and retaining an increasingly diverse workforce. However, we realize there is still much to be done to increase workforce diversity, specifically 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 we have the broadest group of diverse, well-qualified talent from which to recruit.

OCR'D's FY 2018 planned activities include the following:

- In collaboration with DASHR CHCO, complete the implementation plan for recommended strategies identified in the Treasury SES barrier analysis.

## FY 2017 MD-715 Report

- Establish a Treasury-wide working group to finalize the statement of work and amendment to the reasonable accommodation policy to include provisions for providing personal assistant services.
- Create new workforce data tables as required by the implementation of the EEOC's MD-715 Version 2 to be fully implemented in FY 2018 reporting period.
- Once funding is available, continue to develop automated prototype diversity dashboards with CIO that will provide key performance indicators around diversity in the workforce for Treasury managers.
- Continue to monitor the bureau plans to identify the existence of barriers to the employment of any group and strategies to eliminate any barriers that are uncovered.
- Continue to closely monitor the Treasury Complaint Management System to ensure continued improvement in the timely production of Final Agency Decisions and EEO investigations.
- Continue to conduct the "Be a Champion" Roadshow.
- Ensure the 21 new TSN mediator trainees meet their observation and co-mediation requirements.
- Provide at least one dispute prevention activity for the Department.
- Provide one refresher training for current TSN mediators.
- Provide Micro-Trigger training session to the Philadelphia Mint leadership and employees.
- Issue final rule implementing Section 504 of the Rehabilitation Act of 1973 to Treasury assisted programs (31 CFR Part 40).
- Discuss with the DO program offices the establishment of a pre-award compliance review process

and develop an implementation plan.

- Clear the draft Treasury Title VI Guidance for Recipients internally and submit to DOJ for approval.
- Develop a five year External Civil Rights Strategic Plan for the Treasury-wide and DO programs.
- Publish in the Federal Register an updated list of Treasury Title IX covered programs.
- Provide guidance to the Treasury bureaus about Title IX compliance requirements they need to implement.

## **PART F: Certification of Establishment of Continuing EEO Programs**



CERTIFICATION of ESTABLISHMENT of CONTINUING  
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMSI, 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 forThe 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 (Civil Rights and Diversity)

2/1/2018

Signature of Principal EEO Director/Official

Date

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



Kody Kinsley, Assistant Secretary for Management

2/1/2018

Signature of Agency Head or Agency Head Designee

Date

## **PART G: Agency Self-Assessment**

**PART G - Essential Element A, Demonstrated Commitment from Agency Leadership**

Element A requires the agency head to issue written policy statements ensuring a workplace free of discriminatory harassment and a commitment to equal employment opportunity.

**PART G, Essential Element A, Section 1 - Issuance of EEO Policy Statement Indicator**

Measures	Measure Met?	Comments
A.1.a. Was EEO policy statement issued within 6 - 9 months of installation of Agency Head? (Please list date of agency head installation and date of issuance in the comments column.)	Yes	Installed: February 13, 2017 Issued: May 31, 2017.
A.1.b. During current Agency Head's tenure, has EEO policy statement been re-issued annually?	N/A	Not due for re-issue until May 2018.
A.1.c. Are new employees provided a copy of the EEO policy statement during orientation?	Yes	
A.1.d. When an employee is promoted into the supervisory ranks, is s/he provided a copy of the EEO policy statement?	Yes	

**PART G, Essential Element A, Section 2 - Communication of EEO Policy Statements Indicator**

Measures	Measure Met?	Comments
A.2.a. Have the Heads of subordinate reporting components communicated support of all agency EEO policies through the ranks?	Yes	
A.2.b. Has the agency made written materials available to all employees and applicants, informing them of the variety of EEO programs and administrative and judicial remedial procedures available to them?	Yes	
A.2.c. Has the agency prominently posted such written materials in all personnel and EEO offices, and on the agency's internal website? [29 CFR 1614.102(b)(5)]	Yes	

**PART G, Essential Element A, Section 3 - Evaluation of Managers and Supervisors on Their Commitment to EEO Principles Indicator**

Measures	Measure Met?	Comments
A.3.a. Are managers and supervisors evaluated on their commitment to agency EEO policies and principles?	Yes	
A.3.b. Are managers and supervisors evaluated on their commitment to resolve problems/disagreements and other conflicts in their respective work environments as they arise?	Yes	
A.3.c. Are managers and supervisors evaluated on their commitment to address concerns, whether perceived or real, raised by employees and following up with appropriate action to correct or eliminate tension in the workplace?	Yes	
A.3.d. Are managers and supervisors evaluated on their commitment to support the agency's EEO program through allocation of mission personnel to participate in community out-reach and recruitment programs with private employers, public schools and universities?	Yes	
A.3.e. Are managers and supervisors evaluated on their commitment to ensure full cooperation of employees under his/her supervision with EEO office officials such as EEO counselors, EEO investigators, etc.?	Yes	
A.3.f. Are managers and supervisors evaluated on their commitment to ensure a workplace that is free from all forms of discrimination, harassment and retaliation?	Yes	
A.3.g. Are managers and supervisors evaluated on their commitment to ensure that subordinate supervisors have effective managerial communication and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications?	Yes	
A.3.h. Are managers and supervisors evaluated on their commitment to ensure the provision of requested religious accommodations when such accommodations do not cause an undue hardship?	Yes	

A.3.i. Are managers and supervisors evaluated on their commitment to ensure the provision of requested disability accommodations to qualified individuals with disabilities when such accommodations do not cause an undue hardship?	Yes	
A.3.j. Have all employees been informed about what behaviors are inappropriate in the workplace and that this behavior may result in disciplinary actions? If yes, describe what means were utilized by the agency to inform its workforce about penalties for unacceptable behavior in the comments column.	Yes	
A.3.k. Have the procedures for reasonable accommodation for individuals with disabilities been made readily available/accessible to all employees by disseminating such procedures during orientation of new employees and by making such procedure available on the World Wide Web or Internet?	Yes	
A.3.l. Have managers and supervisors been trained on their responsibilities under the procedures for reasonable accommodation?	Yes	

### **PART G - Essential Element B, Integration of EEO into the Agency's Strategic Mission**

Element B requires that the agency's EEO programs be organized and structured to maintain a workplace that is free from discrimination in any of the agency's policies, procedures or practices and supports the agency's strategic mission.

#### **PART G, Essential Element B, Section 1 - Reporting Structure for EEO Program Indicator**

Measures	Measure Met?	Comments
B.1.a. Is the EEO Director under the direct supervision of the Agency Head? [See 29 CFR 1614.102(b)(4)]	Yes	
B.1.b. For subordinate level reporting components, is the EEO Director/Officer under the immediate supervision of the lower level component's head official? (For example, does the Regional EEO Officer report to the Regional Administrator?)	Yes	BEP and Mint corrected the deficiency in FY 2017.
B.1.c. Are the duties and responsibilities of the EEO officials clearly defined?	Yes	

B.1.d. Do the EEO officials have the knowledge, skills, and abilities to carry out the duties and responsibilities of their positions?	Yes	
B.1.e. If the agency has 2nd level reporting components, are there organizational charts that clearly define the reporting structure for EEO programs? (If yes, attach them to this report.)	Yes	
B.1.f. If the agency has 2nd level reporting components, does the agency-wide EEO Director have authority for EEO programs within the subordinate reporting components? (If no, please describe how EEO program authority is delegated to subordinate reporting components, in Part H.)	No	Each Treasury bureau has its own distinct reporting structure for its EEO programs. However, the Director of OCRD has oversight authority as well as input into their annual performance rating.

**PART G, Essential Element B, Section 2 - EEO Communication with Senior Leaders Indicator**

Measures	Measure Met?	Comments
B.2.a. Does the EEO Director/Officer have a regular, effective means of informing the Agency Head and other top management of the effectiveness, efficiency, and legal compliance of the agency's EEO program?	Yes	
B.2.b. After submission of the previous Form 715, did the EEO Director/Officer present a State of the Agency briefing to the Agency Head and other senior officials, including a performance assessment in each of the 6 elements of the Model EEO program, and report agency progress in completing its barrier analysis - including barriers identified, eliminated, or impact reduced?	Yes	January 2017



B.2.c. Are EEO officials present during agency pre-decisional deliberations regarding recruitment strategies, vacancy projections, succession planning, selections for training/career development opportunities, and other workforce changes?	Yes	
B.2.d. 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 re-alignments?	Yes	
B.2.e. Are management/personnel policies, procedures and practices examined at regular intervals to assess whether there are any hidden impediments to the realization of equality of opportunity for any group(s) of employees or applicants? [See 29 C.F.R. 1614.102(b)(3)]	Yes	
B.2.f. Is the EEO Director included in the agency's strategic planning, especially the agency's human capital plan, regarding succession planning, training, etc., to ensure that EEO concerns are integrated into the agency's strategic mission?	Yes	

**PART G, Essential Element B, Section 3 - Sufficient EEO Program Staffing Indicator**

Measures	Measure Met?	Comments
B.3.a. Does the EEO Director have the authority and funding to ensure implementation of agency EEO action plans to improve EEO program efficiency and/or eliminate identified barriers to the realization of equality of opportunity?	Yes	
B.3.b. Are sufficient personnel resources allocated to the EEO Program to ensure that agency self-assessments and self-analyses prescribed by EEO MD-715 are conducted annually and to maintain an effective complaint processing system?	Yes	
B.3.c. Are statutory/regulatory EEO related Special Emphasis Programs sufficiently staffed?	Yes	
B.3.d. Is the Federal Women's Program sufficiently staffed - 5 U.S.C. 7201; 38 U.S.C. 4214; Title 5 CFR, Subpart B, 720.204?	Yes	
B.3.e. Is the Hispanic Employment Program sufficiently staffed - Title 5 CFR, Subpart B, 720.204?	Yes	

B.3.f. Is the People With Disabilities Program Manager; Selective Placement Program for Individuals With Disabilities sufficiently staffed - Section 501 of the Rehabilitation Act; Title 5 U.S.C. Subpart B, Chapter 31, Subchapter I-3102: 5 CFR 213.3102(u); 5 CFR 315.709?	Yes	
B.3.g. Are other agency Special Emphasis Programs monitored by the EEO Office for coordination and compliance with EEO guidelines and principles, such as: FEORP - 5 CFR 720; Veterans Employment Programs; Black/African American; American Indian/Alaska Native; Asian; and Native Hawaiian/Other Pacific Islander Programs?	Yes	

**PART G, Essential Element B, Section 4 - Sufficient EEO Program Funding Indicator**

Measures	Measure Met?	Comments
B.4.a. Are there sufficient resources to enable the agency to conduct a thorough barrier analysis of its workforce, including the provision of adequate data collection and tracking systems?	Yes	
B.4.b. Is there sufficient budget allocated to all employees to utilize, when desired, all EEO programs, including the complaint processing program and ADR, and to make a request for reasonable accommodation? (Including subordinate level reporting components?)	Yes	
B.4.c. Has funding been secured for publication and distribution of EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures, etc.)?	Yes	
B.4.d. Is there a central funding or other mechanism for funding supplies, equipment and services necessary to provide disability accommodations?	No	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.

B.4.e. Does the agency fund major renovation projects to ensure timely compliance with Uniform Federal Accessibility Standards?	Yes	
B.4.f. Is the EEO Program allocated sufficient resources to train all employees on EEO Programs, including administrative and judicial remedial procedures available to employees?	Yes	
B.4.g. Is there sufficient funding to ensure the prominent posting of written materials in all personnel and EEO offices? [See 29 CFR 1614.102(b)(5)]	Yes	
B.4.h. Is there sufficient funding to ensure that all employees have access to the training and information identified in B.4.f?	Yes	
B.4.i. Is there sufficient funding to provide all managers/supervisors with training and periodic up-dates on their EEO responsibilities for ensuring a workplace that is free from all forms of discrimination, including harassment and retaliation?	Yes	
B.4.j. Is there sufficient funding to provide all managers/supervisors with training and periodic up-dates on their EEO responsibilities to provide religious accommodations?	Yes	
B.4.k. Is there sufficient funding to provide all managers/supervisors with training and periodic up-dates on their EEO responsibilities to provide disability accommodations in accordance with the agency's written procedures?	Yes	
B.4.l. Is there sufficient funding to provide all managers/supervisors with training and periodic up-dates on their EEO responsibilities in the EEO discrimination complaint process?	Yes	
B.4.m. Is there sufficient funding to provide all managers/supervisors with training and periodic up-dates on their EEO responsibilities to participate in ADR?	Yes	

### **PART G - Essential Element C, Management and Program Accountability**

Element C 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.

#### **PART G, Essential Element C, Section 1 - EEO Communication with Managers & Supervisors Indicator**

<b>Measures</b>	<b>Measure Met?</b>	<b>Comments</b>
C.1.a. Are regular (monthly/quarterly/semi-annually) EEO updates provided to management/supervisory officials by EEO program officials?	Yes	

C.1.b. Do EEO program officials coordinate the development and implementation of EEO Plans with all appropriate agency managers to include Agency Counsel, Human Resource Officials, Finance, and the Chief Information Officer?	Yes	
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**PART G, Essential Element C, Section 2 - EEO & Human Resources Collaboration & Coordination Indicator**

Measures	Measure Met?	Comments
C.2.a. Have time-tables or schedules been established for the agency to review its Merit Promotion Program Policy and Procedures for systemic barriers that may be impeding full participation in promotion opportunities by all groups?	Yes	
C.2.b. Have time-tables or schedules been established for the agency to review its Employee Recognition Awards Program and Procedures for systemic barriers that may be impeding full participation in promotion opportunities by all groups?	Yes	
C.2.c. Have time-tables or schedules been established for the agency to review its Employee Development/Training Programs for systemic barriers that may be impeding full participation in training opportunities by all groups?	Yes	

**PART G, Essential Element C, Section 3 - Disciplinary Action Taken Indicator**

Measures	Measures Met?	Comments
C.3.a. Does the agency have a disciplinary policy and/or a table of penalties that covers employees found to have committed discrimination?	Yes	
C.3.b. Have all employees, supervisors, and managers been informed as to the penalties for being found to perpetrate discriminatory behavior or for taking personnel actions based upon a prohibited basis?	Yes	
C.3.c. Has the agency, when appropriate, disciplined or sanctioned managers/supervisors or employees found to have discriminated over the past two years? If yes, in the Comment column, cite the number found to have discriminated and list penalty/disciplinary action for each type violation.	Yes	See below

**FY 2016:** The Department of the Treasury had nine (9) findings of discrimination, six (6) of which were FAD's. The seventh and eighth were OFO decisions; and the ninth was an EEOC Administrative Judge's decision which was implemented.

FAD's: (1) disability discrimination for failure to provide reasonable accommodation – training on the Rehabilitation Act for managers was ordered and was provided; consideration of discipline was not ordered; (2) disability discrimination and reprisal for non-selection of former bureau employee – training on EEO law with emphasis on disability discrimination and reprisal, and consideration of discipline for manager, were ordered; training was provided; discipline was considered but found not to be warranted; (3) hostile work environment based on gender (LGBT) - training for managers on EEO law with emphasis on prohibition of gender discrimination, and consideration of discipline for manager and co-workers, were ordered; training was provided; disciplinary action was considered but found not to be warranted; (4) *per se* reprisal for manager's comments that could reasonably deter an employee from pursuing the EEO process – training on EEO law and the rights of employees to express opposition to discrimination and file EEO complaints, and consideration of disciplinary action for manager, were ordered but were not provided because manager was no longer employed at the time of finding; (5) hostile work environment based on sex - no training or consideration of discipline was ordered because the responsible management official was no longer employed by the bureau at time of finding; and (6) failure to approve religious compensatory time based on religion and national origin; training on EEO law with emphasis on prohibition of religious discrimination, and consideration of disciplinary action for managers, were ordered - training was provided; disciplinary action was considered but found not to be warranted.

OFO Decision: age and race discrimination for failure to select for trainee position – training on the ADEA and Title VII for managers, and consideration of discipline, were ordered; training on the ADEA and Title VII was provided for one manager, and disciplinary action was considered but found not to be warranted; the other manager had retired prior to OFO's finding of discrimination.

OFO Decision: disability and reprisal discrimination for failure to provide reasonable accommodation and deterring complainant from requesting reasonable accommodation – training on reasonable accommodation for involved supervisor, EEO official, and others, and consideration of disciplinary action, were ordered; training was provided; disciplinary action was not taken because the EEO official upon whose advice other managers relied had retired by time of finding.

Final Order on EEOC Administrative Judge's Decision (judgment without a hearing): disability discrimination for failure to provide reasonable accommodation for intern – training on ADA for manager, and consideration of disciplinary action, were ordered; training was provided; upper management determined that no disciplinary action would be taken because the manager believed he was following the appropriate policy.

**FY 2017:** The Department of the Treasury had eleven (11) findings of discrimination, six (6) of which were FAD's. The seventh, eighth and ninth were OFO decisions; and the tenth and eleventh were EEOC Administrative Judges' decisions which were implemented.

FAD's: (1) discrimination based on sex (female) when complainant was sexually harassed by a co-worker and management failed to take prompt and appropriate action, and *per se* retaliation when a manager asked her to put the EEO process on hold while management determined whether a suggested resolution was successful – training on EEO law with emphasis on sex discrimination and reprisal was ordered and was provided; (2) disability discrimination for failure to provide reasonable accommodation; training was ordered for all responsible management officials in office where complainant worked; training is pending; (3) 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; (4) 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; (5) 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; (6) discrimination based on sex (female) when complainant was sexually harassed by male co-worker and management failed to take prompt and appropriate action; training and disciplinary action were ordered; both are pending; (7) hostile work environment based on disability and reprisal when, among other things, complainant was denied reasonable accommodation and issued a counseling memorandum; training and consideration of disciplinary action were ordered; training was provided; disciplinary action was considered but found not to be warranted; (8) 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; (9) 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; and (10) improper disclosure of medical information in violation of the Rehabilitation Act; training was ordered and is pending; and (11) improper storage of medical information in violation of the Rehabilitation Act; no training or consideration of discipline was ordered.

C.3.d. Does the agency promptly (within the established time frame) comply with EEOC, Merit Systems Protection Board, Federal Labor Relations Authority, labor arbitrators, and District Court orders?

Yes



C.3.e. Does the agency review disability accommodation decisions/actions to ensure compliance with its written procedures and analyze the information tracked for trends, problem, etc.?	Yes	
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### **PART G - Essential Element D, Proactive Prevention of Unlawful Discrimination**

Element D requires that the Agency Head makes early efforts to prevent discriminatory actions and eliminate barriers to Equal Employment Opportunity in the workplace.

#### **PART G, Essential Element D, Section 1 - Barrier Analysis Process Indicator**

<b>Measures</b>	<b>Measure Met?</b>	<b>Comments</b>
D.1.a. Do senior managers meet with and assist the EEO Director and/or other EEO Program Officials in the identification of barriers that may be impeding the realization of equal employment opportunity?	Yes	
D.1.b. When barriers are identified, do senior managers develop and implement, with the assistance of the agency EEO office, agency EEO Action Plans to eliminate said barriers?	Yes	
D.1.c. Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans?	Yes	
D.1.d. Are trend analyses of workforce profiles conducted by race, national origin, sex, and disability?	Yes	
D.1.e. Are trend analyses of the workforce's major occupations conducted by race, national origin, sex, and disability?	Yes	
D.1.f. Are trend analyses of the workforce's grade level distribution conducted by race, national origin, sex, and disability?	Yes	
D.1.g. Are trend analyses of the workforce's compensation and reward system conducted by race, national origin, sex, and disability?	Yes	
D.1.h. Are trend analyses of the effects of management/personnel policies, procedures and practices conducted by race, national origin, sex, and disability?	Yes	

**PART G, Essential Element D, Section 2 - Alternative Dispute Resolution (ADR) is Encouraged Indicator**

Measures	Measures Met?	Comments
D.2.a. Are all employees encouraged to use ADR?	Yes	
D.2.b. Is the participation of supervisors and managers in the ADR process required?	Yes	

**PART G - Essential Element E, Efficiency**

Element E requires that the Agency Head ensure that there are effective systems in place for evaluating the impact and effectiveness of the agency's EEO programs as well as an efficient and fair dispute resolution process.

**PART G, Essential Element E, Section 1 - Sufficient Resources to Evaluation EEO Program Indicator**

Measures	Measure Met?	Comments
E.1.a. Does the EEO office employ personnel with adequate training and experience to conduct the analyses required by MD-715 and these instructions?	Yes	
E.1.b. Has the agency implemented an adequate data collection and analysis systems that permit tracking of the information required by MD-715 and these instructions?	Yes	
E.1.c. Have sufficient resources been provided to conduct effective audits of field facilities' efforts to achieve a model EEO program and eliminate discrimination under Title VII and the Rehabilitation Act?	Yes	
E.1.d. Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations in all major components of the agency?	Yes	
E.1.e. Are 90 percent of accommodation requests processed within the time frame set forth in the agency's procedures for reasonable accommodation?	No	OCC and IRS both reported no. See Bureau PART H's outlining plans to correct untimely processing.

**PART G, Essential Element E, Section 2 - Effective Complaint Tracking and Monitoring System Indicator**

Measures	Measure Met?	Comments
E.2.a. Does the agency use a complaint tracking and monitoring system that allows identification of the location and status of complaints and length of time elapsed at each stage of the agency's complaint resolution process?	Yes	
E.2.b. Does the agency's tracking system identify the issues and bases of the complaints, the aggrieved individuals/complainants, the involved management officials and other information to analyze complaint activity and trends?	Yes	
E.2.c. Does the agency hold contractors accountable for delay in counseling and investigation processing times? If yes, in the comments column, briefly describe how.	Yes	
E.2.d. Does the agency monitor and ensure that new investigators, counselors, including contract and collateral duty investigators, receive the 32 hours of training required in accordance with EEO Management Directive MD-110?	Yes	
E.2.e. Does the agency monitor and ensure that experienced counselors, investigators, including contract and collateral duty investigators, receive the 8 hours of refresher training required on an annual basis in accordance with EEO Management Directive MD-110?	Yes	

**PART G, Essential Element E, Section 3 - Timeliness in EEO Complaint Process Indicator**

Measures	Measure Met?	Comments
E.3.a. Are benchmarks in place that compares the agency's discrimination complaint processes with 29 CFR Part 1614?	Yes	
E.3.b. Does the agency provide timely EEO counseling within 30 days of the initial request or within an agreed upon extension in writing, up to 60 days?	No	FS, IRS-CC and DO reported no. See Bureau PART H's for plans to correct deficiency.
E.3.c. Does the agency provide an aggrieved person with written notification of his/her rights and responsibilities in the EEO process in a timely fashion?	Yes	

E.3.d. Does the agency complete the investigations within the applicable prescribed time frame?	Yes	Treasury PART H closed in FY 2017.
E.3.e. When a complainant requests a final agency decision; does the agency issue the decision within 60 days of the request?	Yes	
E.3.f. When a complainant requests a hearing, does the agency immediately upon receipt of the request from the EEOC AJ forward the investigative file to the EEOC Hearing Office?	Yes	
E.3.g. When a settlement agreement is entered into, does the agency timely complete any obligations provided for in such agreements?	Yes	
E.3.h. Does the agency ensure timely compliance with EEOC AJ decisions which are not the subject of an appeal by the agency?	Yes	

**PART G, Essential Element E, Section 4 - Efficient and Fair ADR Process Indicator**

Measures	Measure Met?	Comments
E.4.a. In accordance with 29 CFR 1614.102(b), has the agency established an ADR Program during the pre-complaint and formal complaint stages of the EEO process?	Yes	
E.4.b. Does the agency require all managers and supervisors to receive ADR training in accordance with EEOC (29 CFR Part 1614) regulations, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR?	Yes	
E.4.c. Does the responsible management official directly involved in the dispute have settlement authority?	Yes	

**PART G, Essential Element E, Section 5 - Effectiveness of EEO Data Collection Systems Indicator**

Measures	Measure Met?	Comments
E.5.a. Does the agency have a system of management controls in place to ensure the timely, accurate, complete and consistent reporting of EEO complaint data to the EEOC?	Yes	

E.5.b. Does the agency provide reasonable resources for the EEO complaint process to ensure efficient and successful operation in accordance with 29 CFR 1614.102(a)(1)?	Yes	
E.5.c. Does the agency EEO office have management controls in place to monitor and ensure that the data received from Human Resources is accurate, timely received, and contains all of the required data elements for submitting annual reports to the EEOC?	Yes	
E.5.d. Do the agency's EEO programs address all of the laws enforced by the EEOC?	Yes	
E.5.e. Does the agency identify and monitor significant trends in complaint processing to determine whether the agency is meeting its obligations under Title VII and the Rehabilitation Act?	Yes	
E.5.f. Does the agency track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD-715 standards?	Yes	
E.5.g. Does the agency consult with other agencies of similar size on the effectiveness of their EEO programs to identify best practices and share ideas?	Yes	

**PART G, Essential Element E, Section 6 - Elimination of Conflict of Interest with Legal Defense Function Indicator**

Measures	Measure Met?	Comments
E.6.a. Are legal sufficiency reviews of EEO matters handled by a functional unit that is separate and apart from the unit which handles agency representation in EEO complaints?	Yes	
E.6.b. Does the agency discrimination complaint process ensure a neutral adjudication function?	Yes	
E.6.c. If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints?	Yes	

**PART G - Essential Element F, Responsiveness and Legal Compliance**

Element F requires that federal Agencies are in full compliance with EEO statutes and EEOC regulations, policy guidance, and other written instructions.

**PART G, Essential Element F, Section 1 - Timely Compliance With Administrative Judge Orders Indicator**

Measure	Measure Met?	Comments
F.1.a. Does the agency have a system of management control to ensure that the agency officials timely comply with any orders or directives issued by EEOC Administrative Judges?	Yes	

**PART G, Essential Element F, Section 2 - Timely Completion of Ordered Corrective Action Indicator**

Measures	Measure Met?	Comments
F.2.a. Does the agency have control over the payroll processing function of the agency? If yes, answer the two questions below.	Yes	
F.2.b. Are there steps in place to guarantee responsive, timely, and predictable processing of ordered monetary relief?	Yes	
F.2.c. Are procedures in place to promptly process other forms of ordered relief?	Yes	

**PART G, Essential Element F, Section 3 - Staff Accountability for Legal Compliance Indicator**

Measures	Measure Met?	Comments
F.3.a. Is compliance with EEOC orders encompassed in the performance standards of any agency employees? If yes, please identify the employees by title in the comments column, and state how performance is measured.	Yes	An OCRD EEO Specialist has standard Performance Commitment to ensure compliance with the Department's and the EEOC's orders.



F.3.b. Is the unit charged with the responsibility for compliance with EEOC orders located in the EEO office? If no, please identify the unit in which it is located in the comments column.	Yes	
F.3.c. Have the involved employees received any formal training in EEO compliance?	Yes	
F.3.d. Does the agency promptly provide the EEOC Attorney Fee documentation for completing compliance, such as a copy of the check issued for attorney fees and/or a narrative statement by an appropriate agency official, or agency payment order dating the dollar amount of attorney fees paid?	Yes	
F.3.e. Does the agency promptly provide the EEOC awards documentation for completing compliance, such as a narrative statement by an appropriate agency official stating the dollar amount and the criteria used to calculate the award?	Yes	
F.3.f. Does the agency promptly provide the EEOC documentation of back pay and interest for completing compliance, such as computer print-outs or payroll documents outlining gross back pay and interest, copy of any checks issued, or narrative statement by an appropriate agency official of total monies paid?	Yes	
F.3.g. Does the agency promptly provide the EEOC documentation regarding compensatory damages for completing compliance, such as the final agency decision and evidence of payment, if made?	Yes	
F.3.h. Does the agency promptly provide the EEOC training documentation for completing compliance, such as the attendance roster at training session(s), or a narrative statement by an appropriate agency official confirming that specific persons or groups of persons attended training on a certain date?	Yes	
F.3.i. Does the agency promptly provide the EEOC personnel action documentation for completing compliance (e.g., reinstatement, promotion, hiring, reassignment), such as copies of SF-50s?	Yes	
F.3.j. Does the agency promptly provide the EEOC documentation of the posting of Notice of Violation for completing compliance, such as the original, signed and dated notice, reflecting the dates of posting? (A copy will suffice if original is not available.)	Yes	

F.3.k. Does the agency promptly provide the EEOC documentation of supplemental investigation, such as: (1) a copy of the letter to complainant acknowledging receipt from EEOC of remanded case; (2) a copy of the letter to complainant transmitting the Report of Investigation (not the ROI itself, unless specified); and (3) a copy of the request for a hearing (complainant's request or agency's transmittal letter)?	Yes	
F.3.l. Does the agency promptly provide the EEOC the Final Agency Decision (FAD), such as the FAD or a copy of the complainant's request for a hearing?	Yes	
F.3.m. Does the agency promptly provide the EEOC documentation of restoration of leave, such as a print-out or statement identifying the amount of leave restored, if applicable? If no, provide an explanation or statement in the comments column.	Yes	
F.3.n. Does the agency promptly provide the EEOC documentation of civil actions, such as a complete copy of the civil action complaint demonstrating same issues raised as in compliance matter?	Yes	
F.3.o. Does the agency promptly provide the EEOC settlement agreements, such as the signed and dated agreement with specific dollar amounts, and appropriate documentation of relief provided?	Yes	

# **PART H: Attaining the Essential Elements of a Model EEO Program**

<b>EEOC FORM 715-01 PART H</b>		<b>U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>	
<b>Department of the Treasury</b>		<b>For period covering October 1, 2013 to September 30, 2014</b>	
<b>STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:</b>	<p>Timeliness of Treasury Complaint Center (TCC) investigations completed.</p> <p>In its MD-715 reports for FY 2006-2011, the Department included a "PART H, Essential Element E: Efficiency – Timeliness of Treasury Complaint Center (TCC) investigations completed," which was designated as PART H-7. That PART H was closed in FY 2010 as a result of process improvements which continuously raised the percentage of timely completed investigations from a low of 20 percent (2006) to 81 percent in FY 2010, reaching 95 percent in FY 2011. In FY 2013, the Department's timely completed investigations rate fell to 65 percent and the Department therefore has been taking steps to eliminate this deficiency.</p> <p>At the start of FY 2015 (as of October 1, 2014), the Office of Civil Rights and Diversity (OCRD) assumed responsibility for processing all newly filed formal complaints; the former Treasury Complaint Center (TCC) was responsible for processing formal complaints filed through September 30, 2014. The TCC wound down operations as processing was completed and closed in the summer of 2015. Accordingly, the Statement of Model Program Essential Element Deficiency has been updated to remove the reference to TCC.</p>		
<b>OBJECTIVE:</b>	To complete investigations within the applicable timeframes.		
<b>RESPONSIBLE OFFICIAL:</b>	Amelia Demopulos, Complaints Manager, OCRD		
<b>DATE OBJECTIVE INITIATED:</b>	06/30/2013		
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	09/30/2014 Revised completion date <b>September 30, 2017.</b>		
<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b>			
Evaluate and analyze timeframes and overall process TARGET DATE: 06/28/2013 <b>Completed</b>			
Provide training to TCC Investigators. TARGET DATE: 04/30/2013 <b>Completed</b>			
Make recommendations to increase compliance within the prescribed timeframes. TARGET DATE: 07/31/2013 <b>Completed</b>			
Monitor accomplishments of recommendations to assess progress. TARGET DATE: 09/30/2014 <b>Completed</b>			

**PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE CONTINUED:**

Eliminate the overage case inventory.

TARGET DATE: 09/30/2014 **Modified:** 09/30/2015 **Completed**

Designate new Acting TCC Director; end prior detail of the Operations Director and return to TCC role.

TARGET DATE: 12/31/2013 **Completed**

Reassign responsibility for issuing acceptances and dismissals from the TCC to the Office of Civil Rights and Diversity (OCRD), allowing additional TCC staff to focus on completing investigations.

TARGET DATE: 12/31/2013 **Completed**

Closely monitor Investigator progress in completing each investigation; require weekly status updates of each investigation.

TARGET DATE: 09/30/2014 **Completed**

Weekly meeting of TCC and OCRD management to review weekly status updates and identify areas for improvement.

TARGET DATE: 09/30/2014 **Completed**

Determine whether TCC structure should be redesigned.

TARGET DATE: 09/30/2014 **Completed**

Continued focus on improving the timeliness of investigations with the goal of ensuring that 85% are completed timely.

TARGET DATE: 09/30/2017 **Completed**

Initiate process of directly download investigative reports from the "cloud" that USPS offers to its clients.

TARGET DATE: 09/30/2017 **Completed**

**REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:****FY 2014 Accomplishments:**

OCRD successfully completed all FY 2014 plans outlined in the PART H; however, while the overage case inventory was substantially reduced, it was not eliminated. Accordingly, it was determined that the TCC structure will be redesigned in FY 2015.

**REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE CONTINUED:****FY 2015 Modifications to Objectives:**

Beginning October 1, 2014, all newly filed formal complaints will be processed by OCRD. To accomplish this mission, OCRD will establish a Complaint Operations Branch composed of:

One (1) GS-15 EEO Specialist to serve as the Complaint Operations Manager. The Complaints Manager will be responsible for overseeing the processing of formal EEO complaints and overseeing the drafting of acceptance letters, dismissals and final agency decisions, and report to the Deputy Director of OCRD.

Two (2) GS-14 EEO Specialists: The EEO Specialists will be responsible for meeting regularly with USPS (and such other contract investigators whom OCRD may engage) to ensure that investigations are of high quality and are completed within designated timeframes. They also will serve as points of contact between the Treasury bureau where the complaint originated and the contract investigator.

One (1) GS-14 EEO Specialist: The EEO Specialist will be reassigned from the OCRD EEO Program staff to oversee performance under the Interagency Agreement with USPS (and any other service provider), approve payments, monitor complaint status within the Department's complaint tracking system (iComplaints) and prepare the 462 Report.

Three (3) GS-11/ GS-12 EEO Specialists will be selected to supplement OCRD's existing team of final agency decision writers, all of whom will draft acceptances, dismissals, and final agency decisions, as well as review Investigative Plans and Reports of Investigation as needed.

One (1) GS-7 EEO Assistant will be selected to provide administrative assistance.

During FY 2015, the TCC will complete the processing of all formal complaints filed in FY 2014 (i.e., on or before September 30, 2014). As processing is completed, the staffing level at TCC will be reduced from its original 51 FTE slots (not all of which were filled) to none. As of October 1, 2015, the TCC will no longer exist.

**FY 2015 Accomplishments:**

During FY 2015, 79% of the Department's investigations were timely completed, a significant increase from 66% in FY 2014. The Department will continue to strive to improve the timely completion rate, which is expected to improve now that all investigations are the responsibility of OCRD, and as a result of the selection of a Complaints Manager (who assumed the position in September 2015) and the anticipated selection of another Complaint Operations employee in the 2<sup>nd</sup> quarter of FY 2016.

**FY 2016 Accomplishments:**

During FY 2016, 78% of the Department's investigations were timely completed, a modest decrease of 1% from the 79% in FY 2015. However, OCRD is pleased as there was a 12.8% increase in the number of completed investigations and the projected hire of an additional employee in OCRD's Complaint Operations Division did not onboard until late in the 3<sup>rd</sup> quarter of FY 2016.

**FY 2017 Accomplishments:**

In FY 2017, OCRD made the decision to directly download investigative reports from the "cloud" that USPS offers to its clients. The decision to download directly from the cloud has vastly improved the timeliness of our investigations and has reduced costs. In FY 2017, 90 percent of all investigations were timely processed, a 13 percent increase from FY 2016. **Treasury is closing this PART H.**



<b>EEOC FORM 715-01 PART H</b>		<b>U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>	
<b>Department of the Treasury</b>		<b>For period covering October 1, 2013 to September 30, 2014</b>	
<b>STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:</b>	In Treasury's EEOC Technical Assistance Feedback Letter, dated May 22, 2017, EEOC identified that the percentage of dismissals reversed by OFO increased from 22% in FY 2014 to 33% in FY 2016.		
<b>OBJECTIVE:</b>	To decrease the rate of Treasury reversals by OFO.		
<b>RESPONSIBLE OFFICIAL:</b>	Gail Demers, Deputy Director, OCRD		
<b>DATE OBJECTIVE INITIATED:</b>	May 22, 2017		
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	February 15, 2018		
<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b>	<b>Target Completion Date:</b>	<b>Date Completed</b>	
Review FY 2017 data to determine the reversal rate of dismissals appealed to EEOC and adjudicated by EEOC in FY 2017.	November 30, 2017	<b>November 30, 2017</b>	
If reversal rate has not decreased by at least 5%, conduct an analysis of its reversed decisions during FY 2017 to determine whether there are common errors.	January 31, 2018	<b>November 30, 2017</b>	
Provide training to Complaint staff on any common errors identified during the analysis.	February 15, 2018	<b>December 6, 2017</b>	
<b>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE</b>			
<p>During FY 2017, the EEOC issued appellate decisions on 14 dismissals issued by the Department. Four (4) of the 14 dismissals were reversed (a 28% dismissal rate). Although this dismissal rate is a decrease of 5% from the FY 2016 rate, the four (4) reversals were reviewed to determine whether there are common errors.</p> <p>Two of the complaints involved egregious claims (use of the "N" word and sexual harassment): (1) The complainant refused to participate in the counseling process and his subsequent formal complaint was dismissed under 29 C.F.R. § 1614.107(a) (2) on the basis that because complainant refused to identify his claims in the informal stage, his formal complaint could not raise claims that were "like or related" to</p>			

**REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE CONTINUED:**

any claims brought to an EEO Counselor. The Commission found that the EEO Counselor failed to give Complainant notice in writing of the effect of his refusal to participate at the informal stage. (2) The Department dismissed the sexual harassment complaint for untimely EEO contact. The EEOC decision stated that: "Based on the specific circumstances of this case, we exercise our discretion [to] waive the applicable time limits."

In a third case, (3) the formal complaint was filed one (1) day late and the EEOC found that sufficient justification for the delay in the filing based on "these particular circumstances, Complainant's good faith effort to timely file... and the short amount of time ... (one day)..."

In the fourth case, (4) complainant sought EEO counseling on July 21, 2014, after he was informed that his temporary position would end effective March 7, 2015 and he would be returned to his permanent position. The Department dismissed the complaint as alleging a proposed personnel action since the challenged personnel action had not yet occurred and also, in the alternative, for untimeliness, since during an earlier contact with an EEO Counselor in February 2013, complainant had been advised to initiate the EEO process within 45 days of being informed that his temporary position would end effective March 7, 2015. EEOC found that, since the agency had made the decision to return the complainant to his permanent position, complainant was not challenging a proposed action. EEOC further found that complainant "timely initiated EEO counseling since he did so prior to the effective date of the personnel action."

OCRd has carefully reviewed these decisions. With respect to the first decision (1), the Department will instruct the bureau EEO Counselors to clearly inform complainants of the effect of refusal to participate in the EEO process. With respect to the next two decisions (2 and 3), EEOC exercised its judgement to waive the time limits. The Department believes that there was no justification to do so. The last decision (4) involved an error by OCRd in not accepting the claim and was discussed with our intake staff.

Training outlining common errors identified during the analysis of reversal rate of dismissals appealed to EEOC was conducted with complaint processing staff on December 6, 2017.

**Closed**

## **PART I: EEO Plans to Eliminate Identified Barrier**

<p><b>EEOC FORM 715-01 PART I</b></p> <p><b>Department of the Treasury</b></p>	<p><b><i>U.S. Equal Employment Opportunity Commission</i></b>  <b>FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>  <b>EEO Plans to Eliminate Identified Barrier</b></p> <p><b>For period covering October 1, 2015 to September 30, 2016</b></p>
<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>In August FY 2015, Treasury received a feedback letter from the EEOC based on the Department and its bureaus' responses to the EEOC's Federal Complement Plan (FCP) Questionnaire and a follow up meeting with EEOC staff members on June 12, 2015. 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>
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>Reviewed bureau policies, MD-715 reports, and 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, applicant data, and bureau SES Career Development Program (CDP) participation and application processes.</p> <p>Reviewed bureau HR/EEO responses to the following questions:</p> <ol style="list-style-type: none"> <li>1. How are SES vacancies announced?</li> <li>2. Are all SES announcements processed through CareerConnector/Monster?</li> <li>3. Are all SES announcements Public? Or Status? If not, can they be restricted to internal?</li> <li>4. What is the required length of time for posting SES vacancies?</li> <li>5. How do you recruit for SES vacancies?</li> <li>6. Do you conduct targeted recruitment and outreach? And if so, what does that mean/look like? (for any ERI, gender or occupational series)</li> <li>7. Is the application process resume only? Or does it allow for ECQ's?</li> <li>8. What is the selection process? (Be specific)</li> <li>9. How do you rate/rank?</li> <li>10. If you use a selection panel, is there a policy pertaining to the diversity of the panel?</li> <li>11. If there is a policy pertaining to the diversity of the panel, how do you enforce the policy?</li> <li>12. Who determines the criteria for the vacancy announcement?</li> <li>13. Are your interviewers trained in interviewing techniques?</li> <li>14. Are your interviewers trained in unconscious bias?</li> <li>15. Provide a list of the occupations that feed into your SES ranks.</li> </ol>

**STATEMENT OF IDENTIFIED BARRIER:**

Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.

The working group found that the Department as a whole has made significant strides in the increased 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 SESCO program, whereas 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 SESCO 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.

<b>OBJECTIVE:</b>  State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.	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.	
<b>RESPONSIBLE OFFICIAL:</b>	<b>Mariam Harvey</b> , Director of the Office of Civil Rights and Diversity <b>Trevor Norris</b> , Deputy Assistant Secretary for Human Resources and Chief Human Capital Officer	
<b>DATE OBJECTIVE INITIATED:</b>	September 30, 2016	
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	September 30, 2018	
<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b>		<b>TARGET DATE (Must be specific)</b>
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. (OCD) <b>Completed.</b>		June 28, 2016
Brief Departmental Executive Resources Board on the report and get endorsement for the recommendations in the report. (OCD/DASHR CHCO) <b>Completed.</b>		August 15, 2016
Submit to ASM for approval and dissemination to Bureau Heads. Disseminated final report to EEO Officers. (OCD) <b>Completed.</b>		September 15, 2016
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/OCD) <b>Modified: September 30, 2018</b>		September 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. (OCD) <b>Modified: September 30, 2018</b>		September 30, 2018
Establish policy to require all bureaus to track applicant flow data for all SESCDP programs to enhance barrier analysis capabilities on the SESCDP programs. (DASHR CHCO) <b>Modified: September 30, 2018</b>		September 30, 2018



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) <b>Modified: September 30, 2018</b>	September 30, 2018
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) <b>Modified: September 30, 2018</b>	September 30, 2018
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) <b>Modified: September 30, 2018</b>	September 30, 2018
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) <b>Modified: September 30, 2018</b>	September 30, 2018
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) <b>Modified: September 30, 2018</b>	September 30, 2018
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. (OCRD) <b>Modified: September 30, 2018</b>	September 30, 2018
Incorporate a discussion of EEO and diversity into all SES orientation and training for new executives. (DASHR CHCO/OCRD) <b>Modified: September 30, 2018</b>	September 30, 2018

**REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE****FY 2016 Accomplishments:**

OCRDR 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 DRB 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)

In August 2015, OCRDR 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, OCRDR and Monster are working together to implement the new requirements in FY 2017.

**FY 2017 Accomplishments:**

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.

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 changes before making any further revisions to the existing MD-715 data tables.

## **PART J - Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals with Targeted Disabilities**

## EEOC FORM

*U.S. Equal Employment Opportunity Commission*

## FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

**MD-715 – Part J****Department of the Treasury****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.

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)	Yes 0	No 15.61%
b. Cluster GS-11 to SES (PWD)	Yes 11.09%	No 0

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

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)	Yes 0	No 4.56%
b. Cluster GS-11 to SES (PWTD)	Yes 0	No 2.68%

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 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

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

Yes X      No 0

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.

#### 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

### 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.

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.

Yes X                      No 0                      N/A 0

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)	Yes 0	No 16.32%
b. New Hires for Permanent Workforce (PWTD)	Yes 0	No 3.02%

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below.

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

<b>FY 2017 Hires</b>	<b>Applicants vs. Hires</b>	<b>Applicants vs. Hires</b>
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 PWTD 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 PWTD among the qualified *internal* applicants for any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below.

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

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

Applicants vs. Promotions	Applicants vs. Promotions
0340 - PWD: 4.56% - 2.40%	PWTD: 1.90% - 1.20%
0343 - PWD: 3.90% - 1.72%	PWTD: 1.62% - 0.86%
0501 - PWD: 4.69% - 4.90%	PWTD: 1.80% - 2.94%
0570 - PWD: 2.48% - 1.84%	PWTD: 1.30% - 0.74%
0905 - PWD: 1.00% - 0.00%	PWTD: 0.00% - 0.00%
1169 - PWD: 1.94% - 1.25%	PWTD: 0.88% - 0.31%
2210 - PWD: 4.85% - 1.72%	PWTD: 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 PWTD 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 PWTD within the major occupations listed see specific bureau PART J's.

#### **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.

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. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate. [Collection begins with the FY 2018 MD-715 report, which is due on February 28, 2019.]

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						

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 0	N/A X
b. Selections (PWD)	Yes 0	No 0	N/A X

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



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 0	N/A X
b. Selections (PWTD)	Yes 0	No 0	N/A X

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

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)	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.

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

See specific bureau PART J's.

## D. Promotions

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

## a. SES

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

## b. Grade GS-15

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

## c. Grade GS-14

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

## d. Grade GS-13

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

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 PWTB 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 (PWTB)	Yes	0	No	0	N/A	X
ii. Internal Selections (PWTB)	Yes	0	No	0	N/A	X

b. Grade GS-15

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

c. Grade GS-14

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

d. Grade GS-13

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

Relevant Pool Applicants/Promotions

GS-13 - PWTB: 3.53% - 0.97% - 0.18%

GS-14 - PWTB: 2.48% - 2.02% - 1.49%

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

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

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

## b. Managers

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

## c. Supervisors

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

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

## b. Managers

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

## c. Supervisors

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



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

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

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

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

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 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.

- 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.

#### 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.

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 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 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?

Yes X      No 0      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

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 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



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.

Trigger 1	Treasury bureaus that noted triggers in their workforce evaluation are required to address these triggers in their bureau PART J. For plans to address and remove identified barriers for PWD and PWTD see specific bureau PART J's.			
Barrier(s)				
Objective(s)				
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)		
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.

See specific bureau PART J's

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

See specific bureau PART J's

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.

See specific bureau PART J's

# **Appendix A: Department of the Treasury FY 2017 EEO Policy**



DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C.

SECRETARY OF THE TREASURY

May 31, 2017

**MEMORANDUM FOR ALL TREASURY EMPLOYEES**

**FROM:** Steven T. Mnuchin *Steven T. Mnuchin*

**SUBJECT:** Equal Opportunity Policy

Early in my service as Treasury Secretary, I wanted to take an opportunity to share my personal commitment to creating and maintaining a talented workforce, where diversity and inclusion are a valued business principle. I also expect that Treasury staff will continue to provide programs and services to the American public in a manner that demonstrates our commitment to fairness, integrity, and equality.

I am committed to providing and promoting equal employment opportunity (EEO) in the Treasury Department, regardless of race, color, sex (including gender identity, sexual orientation, and pregnancy), national origin, religion, age, disability, parental status, and protected genetic information, for all employees and applicants for employment. I believe employees are accountable for adhering to EEO laws and policies and should always treat colleagues with respect, dignity, and professionalism. I fully support the Department's prohibition against discrimination in all of our policies, programs, and operations and affirm a zero tolerance standard for all types of discrimination and harassment, including sexual harassment, in the workplace.

All Department employees, including supervisors and other management personnel, are expected to uphold all applicable laws, regulations, and Treasury policies that bar discrimination and harassment immediately and appropriately. Finally, retaliation against individuals participating in the EEO process or against individuals reporting unlawful discrimination is prohibited. For more information regarding the Department's anti-discrimination and EEO policies, I encourage you to visit [https://www.treasury.gov/about/organizational-structure/offices/Mgt/Pages/eoo\\_policy.aspx](https://www.treasury.gov/about/organizational-structure/offices/Mgt/Pages/eoo_policy.aspx) or contact your servicing EEO office.

As I messaged to you on my first day in office, I have been consistently impressed by your dedication and professionalism. While there are inevitable challenges ahead, I am confident that together, we will do great things for Treasury and for the American public we serve.



# DIVERSITY & INCLUSION

# *Commitment*

I am committed to diversity, inclusion, and dignity for all people.  
I value the many ways people are different, including their social identity,  
training, experiences, and interests.

I contribute to a workplace environment within Treasury where all people  
feel their unique talents, ideas, perspectives, and contributions are  
valued, respected, and fully utilized.

