

# Annual EEO, Civil Rights and Diversity Report

FISCAL YEAR 2019



**MD-715**  
**Parts A Through E**

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

Agency	Second Level Component	Address	City	State	Zip Code (xxxxx)	Agency Code (xxxx)	FIPS Code (xxxx)
Department of the Treasury	N/A	1500 Pennsylvania Ave, NW	Washington	DC	20220	TR	11001

**Part B - Total Employment**

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	90319	1520	91839

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

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

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

EEO Program Staff	Name	Title	Occupational Series (xxxx)	Pay Plan and Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
Principal EEO Director/Official	Mariam Harvey	Director (OCRD)	0260	ES	202-622-0316	<a href="mailto:Mariam.Harvey@treasury.gov">Mariam.Harvey@treasury.gov</a>
Deputy Director EEO	Snider Page	Deputy Director (OCRD)	0260	GS-15	202-622-0341	<a href="mailto:Snider.Page@treasury.gov">Snider.Page@treasury.gov</a>
Affirmative Employment Program Manager	Tina Lancaster	Manager of EEO Programs	0260	GS-15	202-622-1079	<a href="mailto:Tina.Lancaster@treasury.gov">Tina.Lancaster@treasury.gov</a>
Complaint Processing Program Manager	Guizelous (Guy) Molock	Complaints Manager	0260	GS-15	202-622-4178	<a href="mailto:Guizelous.Molock@treasury.gov">Guizelous.Molock@treasury.gov</a>
Manager of Special Emphasis Programs	Tina Lancaster	Manager of EEO Programs	0260	GS-15	202-622-1079	<a href="mailto:Tina.Lancaster@treasury.gov">Tina.Lancaster@treasury.gov</a>

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

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

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

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

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

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

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

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

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

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

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## Part E – Executive Summary

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

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

#### Introduction/Mission

This report covers the period of October 1, 2018, through September 30, 2019, and highlights the Department of the Treasury's accomplishments during Fiscal Year (FY) 2019 in attaining and maintaining a model equal employment opportunity (EEO) Program.

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

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

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

#### Organization

The Department of the Treasury (Department) 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 and overseeing the bureaus, which manage major operations.

#### Organizational Reporting Structure

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

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

Bureaus employing fewer than 1,000 employees are required to provide their individual MD-715 reports to Treasury's Office of Civil Rights and Diversity (OCRD) for inclusion in the Treasury's overall report. 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

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hiring, recruitment, and retention of employees within the broad framework of the Department's Human Capital Strategy. The OCRD, part of the Departmental Offices' organizational structure, is primarily responsible for providing guidance and oversight to the bureaus' EEO offices.

**The Office of Civil Rights and Diversity**

The Office of Civil Rights and Diversity administers the Department-wide equal employment opportunity (EEO) and diversity (EEOD) 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 OCRD's External Civil Rights Program ensures individuals are not excluded from participation in, denied the benefits of, or otherwise subjected to prohibited discrimination under programs or activities conducted or funded by the Department.

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.

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

N/A

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

**Workforce Demographics**

The following are Treasury's workforce demographic trends over the period of FY 2009 to FY 2019<sup>1</sup>. The area where participation rates have been of the most concern government-wide and at the Department have been the distribution of women and non-Whites in the General Schedule grades (GS) 13 through 15, the Senior Executive Service (SES) and equivalent pay plans (OR, TR, IR and NB), and the participation rates for Hispanics.

Additionally, for a cabinet-level agency the size of Treasury, data typically varies only by tenths of a percent from one year to the next. However, when evaluating trends over time, and as a result of the bureaus' efforts to improve diversity in those areas with lower than expected participation rates, Treasury has noted significant progress for the overall participation rate for Hispanics and people with disabilities (PWD) and people with targeted disabilities (PWTDD).

**Participation Rates in the Permanent Workforce**

At the close of FY 2019, Treasury had 90,319 permanent employees<sup>2</sup>, a decrease of 1,830 (-1.99 percent net change) employees from FY 2018. This decrease is primarily due to reduced budgets which have significantly limited or reduced hiring opportunities for many of the Treasury's bureaus in FY 2019.

Treasury and its bureaus continue to utilize the RCLF tool updated at the end of FY 2019, which provides

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

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

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a more realistic benchmark comparator. The RCLF is based off of the National Civilian Labor Force. However, rather than calculating a weighted average for all available occupations in the federal government, it calculates the expected labor force based on a weighted average of only those occupations in Treasury's workforce.

A comparison of FY 2019 participation rates in Treasury's permanent workforce for men and women shows little change from FY 2009. However, based on the RCLF availability rates, we see that women (61.56 percent compared to 64.98 percent RCLF) and men (38.44 percent compared to 35.02 percent RCLF) are participating at rates close to their RCLF availability rates. Additionally, based on the RCLF, Treasury has a better understanding as to why the participation rate for women at the Department is significantly above the CLF availability rate (48.14 percent CLF compared to 64.98 percent RCLF) and the participation rate for men is significantly below the CLF availability rate (51.86 percent CLF compared to 35.02 percent RCLF).

In FY 2009, Treasury's permanent workforce was 59.90 percent White and 40.10 percent non-White. In FY 2019, the participation rate for Whites decreased to 53.16 percent of the workforce and non-Whites increased to 46.84 percent. Thus, Treasury has noted a positive trend in the increased participation rate for non-Whites in the overall workforce. In fact, Hispanics (12.10 percent compared to 8.50 percent RCLF), Blacks (26.09 percent compared to 10.57 percent RCLF), Asians (6.45 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 (0.81 percent compared to 0.89 percent RCLF) are participating at rates very close to their availability rates. Whites (53.16 percent compared to 74.93 percent) and Two or More Races (0.42 percent compared to 0.51 percent) are the only groups participating at rates below their RCLF availability rates.

### **Distribution in the Grades**

The distribution of women and non-Whites in Treasury's workforce has been an area of focus for the Department. OCRD has closely monitored the distribution of women and non-Whites in the feeder pools (GS 13 – GS 15) that lead to SES and SES positions. From FY 2009 to FY 2015, Treasury noted an increased participation rate for women in the GS-13 and GS-15 grades as well as in SES positions. However, from FY 2015 to FY 2019, Treasury has noted a decrease in the participation rate for women at the GS-13 through GS-15 and SES level positions. It is also important to note that due to the extended furlough that occurred at the beginning of FY 2019, Treasury and many of its bureaus were unable to make significant progress towards meaningful barrier analysis in this area. However, in FY 2020, OCRD will require the bureaus to focus efforts to determine if there are barriers for women in SES positions and the feeder pools (GS-13 through GS-15 grades and equivalents).

At the GS-13 grade level, the participation rate for women increased by 0.83 percent from 49.49 percent in FY 2009 to 50.32 percent in FY 2015. However, Treasury saw a 0.43 percent decreased participation rate for women at GS-13 grade level from FY 2015 (50.32 percent) to FY 2019 (49.89 percent). At the GS-14 grade level, the participation rate for women decreased by 0.78 percent from 47.44 percent in FY 2009 to 46.66 percent in FY 2015; the rate increased 0.07 percent in FY 2019 to 46.73 percent. At the GS-15 grade level, the participation rate for women increased by 2.22 percent from 44.65 percent in FY 2009 to 46.87 percent in FY 2015, but decreased by 1.04 percent from FY 2015 to FY 2019 (45.83 percent). Furthermore, at the SES level, the participation rate for women increased by 4.72 percent from 35.71 percent in FY 2009 to 40.43 percent in FY 2015, but decreased by 2.88 percent to 37.55 percent in FY 2019.

At the GS-13 grade level, the participation rate for Hispanics increased by 0.93 percent from 6.07 percent in FY 2009 to 7.00 percent in FY 2015, and by FY 2019, it increased by an additional 0.64 percent to 7.64 percent. At the GS-14 grade level, the participation rate for Hispanics increased by 1.13 percent from 4.54 percent in FY 2009 to 5.67 percent in FY 2015, and by FY 2019, it increased an additional 0.59 percent to 6.26 percent. At the GS-15 grade level, the participation rate for Hispanics increased by 0.45 percent from 3.84 percent in FY 2009 to 4.29 percent in FY 2015, and by FY 2019, it increased an



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additional 0.41 to 4.70 percent. Similarly, at the SES level, the participation rate for Hispanics increased by 1.12 percent from 3.57 percent in FY 2009 to 4.69 percent in FY 2015. However, the participation rate decreased by 0.54 percent to 4.15 percent in FY 2019 for Hispanics at the SES level.

At the GS-13 grade level, the participation rate for Blacks increased by 1.98 percent from 18.41 percent in FY 2009 to 20.39 percent in FY 2015, and, the rate increased an additional 0.84 percent to 21.23 percent in FY 2019. At the GS-14 grade level, the participation rate for Blacks increased by 0.97 percent from 17.65 percent in FY 2009 to 18.62 percent in FY 2015 and, by FY 2019, it increased an additional 1.91 percent to 20.53 percent. At the GS-15 grade level, the participation rate for Blacks increased by 1.11 percent, from 15.34 percent in FY 2009 to 16.45 percent in FY 2015, but decreased by 0.29 percent to 16.16 percent in FY 2019. At the SES level, the participation rate for Blacks increased by 2.11 percent from 10.71 percent in FY 2009 to 12.82 percent in FY 2018, but decreased slightly by 0.37 percent in FY 2019 (12.45 percent).

At the GS-13 grade level, the participation rate for Asians increased by 1.97 percent from 7.09 percent in FY 2009 to 9.06 percent in FY 2015, and by FY 2019, it increased an additional 1.07 percent to 10.13 percent. At the GS-14 grade level, the participation rate for Asians increased by 3.38 percent from 5.81 percent in FY 2009 to 9.19 percent in FY 2015, by FY 2019, it increased an additional 1.81 percent to 11.00 percent. At the GS-15 grade level, the participation rate for Asians increased by 2.64 percent from 3.95 percent in FY 2009 to 6.59 percent in FY 2015, and by FY 2019, it increased an additional 1.36 percent to 7.95 percent. At the SES level, the participation rate for Asians increased slightly by 0.04 percent from 3.75 percent in FY 2009 to 3.79 percent in FY 2015, and by FY 2019, it increased an additional 0.54 percent to 4.33 percent.

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 4.97 percent from 67.31 percent in FY 2009 to 62.34 percent in FY 2015, and by FY 2019, the rate decreased further by 2.62 percent to 59.72 percent. At the GS-14 grade level, the participation rate for Whites decreased by 5.62 percent from 71.02 percent in FY 2009 to 65.40 percent in FY 2015, by FY 2019, the rate decreased further by 4.36 percent to 61.04 percent. At the GS-15 grade level, the participation rate for Whites decreased by 4.52 percent from 76.30 percent in FY 2009 to 71.78 percent in FY 2015, by FY 2019, the rate decreased further by 1.55 percent to 70.23 percent. Similarly, at the SES level, the participation rate for Whites decreased by 3.63 percent, from 81.61 percent in FY 2009 to 77.98 percent in FY 2015 and by 0.37 percent in FY 2019 (77.61percent).

It is important to note that when one 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 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. The bureaus 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, develop plans to eliminate identified barriers.

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

### **Disability Employment Program**

In Treasury's FY 2009 MD-715 Report submitted to EEOC, Treasury reported a permanent workforce participation rate of 8.82 percent for PWD and 1.71 percent for PWTD. At the end of FY 2019, Treasury is pleased to note that we have exceeded the goal of a 12 percent participation rate for PWD (12.67 percent) and the goal of 2 percent for PWTD (3.49 percent). Treasury also exceeded the new hire goals

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with 13.64 percent being PWD of which 3.43 percent were PWTD.

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

**FY 2019 Disability Participation Rates By Bureau**

Bureau	Total	PWD #	PWD %	PWTD #	PWTD %
BEP	1742	288	16.53%	38	2.18%
DO	1760	161	9.15%	28	1.59%
FINCEN	275	44	16.00%	10	3.64%
FS	3305	752	22.75%	140	4.24%
IRS	74646	9186	12.31%	2730	3.66%
IRS-CC	2002	181	9.04%	43	2.15%
MINT	1544	329	21.31%	72	4.15%
OCC	3622	329	9.08%	72	1.99%
OIG	149	26	17.45%	7	4.70%
SIGT	52	5	9.62%	0	0.00%
TIGTA	732	75	10.25%	6	0.82%
TTB	490	67	13.67%	10	2.04%
<b>Total</b>	<b>90319</b>	<b>11443</b>	<b>12.67%</b>	<b>3148</b>	<b>3.49%</b>

The goals for the employment of PWD and PWTD include achieving a 12 percent participation rate for PWD at both the GS-10 and below and at the GS-11 and above, as well as the goal to achieve a 2 percent participation rate for PWTD in both groups. We are pleased to note that Treasury's current participation rates for PWD (14.39%) and PWTD (4.36%) at the grades GS-10 and below exceed the goals of 12 percent and 2 percent.

The participation rate for PWTD (2.65%) currently exceeds the goal of a 2 percent participation rate at the GS-11 and above grades levels. However, the participation rates for PWD (10.86%) at the GS-11 and above is slightly below the 12 percent goal, indicating there is still work to be done.

In FY 2019, OCRD implemented a resume database for veterans to assist the Department with achieving its hiring goals for veterans and PWD. The resume database also serves as a tool to enhance the Department's "Be a Champion" initiative, which promotes the hiring of veterans and PWD in high visibility positions. In conjunction with the bureau audits, the Department's Disability Program Manager and the Veterans Employment Coordinator used this platform to promote the Department's "Be a Champion Roadshows." 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.

During FY 2019, Treasury continued to utilize OPM's Talent Portal located on USAJobs as a resume mining database for PWD and Veterans. Using the Talent Portal provided Treasury and its bureaus' hiring managers access to resumes of qualified candidates with disabilities and veterans. The use of this tool continues to assist 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.

Also in FY 2019, OCRD partnered with IRS to procure a Treasury-wide reasonable accommodation tracking system to improve the timeliness and efficiency of providing reasonable accommodations (RA) to qualified PWD. The RA tracking system will be implemented Treasury-wide in FY 2020.

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OCRCD has posted its Personal Assistance Service (PAS) policy and procedures to our internal and external websites. The external link is [https://www.treasury.gov/about/organizational-structure/offices/Mgt/Pages/eeo\\_programs.aspx](https://www.treasury.gov/about/organizational-structure/offices/Mgt/Pages/eeo_programs.aspx). In addition, the Department is pleased to announce its newest vehicle, a Treasury-wide Blanket Purchase Agreement (BPA) to facilitate the method for fulfilling requests for PAS Providers nationwide. Providing PAS promotes the assurance of full access to equal employment opportunity (EEO) to qualifying Treasury employees with targeted disabilities.

OCRCD promotes awareness on Disability topics within many of its publications: quarterly newsletters, OCRD Advisory, and Manager's Alerts. Through these varied sources, the Department ensures that hiring managers are informed of and encouraged to use various resources and tools that provide assistance with the employment of PWD, e.g., CAREERS and the disABLED, OPM's Bender Consulting Services, the Division of Rehabilitation Services (DORS), and State Vocational Rehabilitation Agencies.

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

### **Accomplishments**

The Department is proud of its accomplishments towards maintaining a model EEO program in FY 2019. The accomplishments below outline our many successes throughout the reporting period:

- Reinstated the bureau audit program, reviewed all phases of the Mint's and IRS's EEO programs, including diversity and inclusion, external civil rights, and EEO complaint process.
- Worked with Enterprise Data Management (EDM) and Monster Analytics to improve reporting capability of workforce analytics, resulting in improved data analysis capabilities around workforce demographics, as shown by meeting the new EEOC reporting requirements. Trained 100% of the bureaus in data analysis capabilities enabling bureaus to provide data on demand to leadership.
- Collaborated with the Office of the Chief Information Officer (OCIO) and EDM to develop automated diversity dashboards that will enhance 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. These dashboards will contain the individual bureau dashboards for each bureau to access. The dashboards' data will be updated each pay period and deployed in FY 2020.
- Performed analysis of off-the-shelf commercial programs designed to improve reporting on the reasonable accommodation process. Partnered with the Chief Information Officer, Procurement, and budget to procure a Treasury-wide reasonable accommodation tracking system scheduled to roll out in FY 2020.
- Held quarterly meetings with the Bureaus' EEO Officers to discuss EEO emerging issues, best practices and concerns, and the various EEO programs and activities being conducted by the Bureaus' EEO offices.
- Promoted the use of the Alternative Dispute Resolution (ADR) Process to resolve EEO disputes. Collaborated with the bureaus' ADR Coordinators to establish a Working Group to increase Treasury's ADR participation and settlement rates. Developed a list of best practices and documents that bureaus could use to improve ADR participation and settlement.
- Finalized the Blanket Purchase Agreement (BPA) for personal assistance services for all bureaus to use, enabling Treasury to meet EEOC expectations regarding personal assistance services for our severely-disabled employees.
- Closely monitored the Treasury Complaint Management System to ensure continued improvement in the timely production of final agency decisions and EEO investigations, resulting in at least 94% timeliness rate for investigations and decisions.
- Updated the Department's Sexual Harassment brochure and Procedures for Addressing Allegations of Discriminatory Harassment. These items were made available to our employees through OCRCD's internal website.
- Contracted with an additional EEO investigative services provider for back up and special circumstance services.

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- Ensured Treasury Shared Neutral (TSN) mediator trainees reach certification status and become active cadre members.
- As part of Treasury's FY 2019 ADR Program, coordinated and conducted a Dispute Prevention training session that emphasized the benefits of ADR; provided one refresher training for current TSN mediators.
- Transitioned the TSN administrator functions to BEP for FY 2020 and FY 2021.
- Continued 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.
- Conducted training sessions with bureau MD-715 preparers on the use of the new MD-715 V2 workforce data tables implemented as part of the FY 2019 reporting cycle.
- Updated the Department's "Be a Champion" leadership Message which encourages managers and hiring officials to use special hiring authorities for increasing the participation rate for qualified PWTB and disabled veterans.
- Promoted the use of Operation Warfighter Internships as a tool to increase the hiring of veterans with disabilities.
- Exceeded EEOC's goal that 12 percent of all new permanent hires be PWD (14.17 percent) and the sub goal that 2 percent of those hires be PWTB (3.15 percent).
- Established a cadre of 21 certified trainers to assist the Department in providing Civil Treatment Training to the workforce. The cadre trained 25 managers at 6 bureaus.
- Published four OCRD Advisory Newsletters to the workforce and two Manager's Alerts to managers and supervisors on information relevant to EEO complaint program matters, changes to policy and/or procedures, workforce statistics, and important upcoming agency events/activities.
- Supported Special Emphasis Programs with education and awareness through the use of newsletters, trainings, and activities such as the annual interagency Pride in Federal Service's first Lesbian Gay Bisexual Transgender and Queer Plus (LGBTQ+) and Ally Conference; Treasury Holocaust Day of Remembrance at the Lincoln Theater and Martin Luther King, Jr. Treasury-wide Breakfast.

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

### **Planned Activities/Conclusion**

The Department of the Treasury's FY 2019 MD-715 Report outlines the many successes in our equal opportunity programs and activities. The Department is proud of its accomplishments in the areas of attracting and retaining an increasingly diverse workforce. However, there is an unremitting effort to increase workforce diversity, specifically within our mission critical occupations, in senior pay levels and feeder groups, and to improve the hiring and promotion rates of women, Hispanics, individuals with disabilities/targeted disabilities. As we move forward into the next fiscal year, we will maintain our focus on developing plans to ensure Treasury and its bureaus have the broadest group of diverse, well-qualified talent from which to recruit.

OCRD's FY 2020 planned activities include the following:

- Implement the Treasury-wide Reasonable Accommodation (RA) Tracking System to improve the timeliness and efficiency of providing reasonable accommodations for qualified persons with disabilities and improve ability to track data around RA.
- Partner with the Bureau EEO Officers to develop and establish a multi-year Treasury-wide EEO Strategic Plan.
- Continue the bureau audit program, reviewing at least two bureaus in all phases of their EEO programs, including diversity and inclusion, external civil rights, and EEO complaint process.
- Partner with OCIO, Procurement, and budget to plan for acquisition of a new EEO Complaint Tracking System to produce EEO reports and transfer data between users more efficiently.
- Promote the use of the Alternative Dispute Resolution (ADR) Process to resolve EEO disputes.

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- Evaluate the effectiveness of the Treasury Shared Neutrals Program and make improvements.
- Hold quarterly meetings with the Bureau EEO Officers to discuss EEO emerging issues, best practices and concerns, and the various EEO programs and activities being conducted by the Bureau EEO offices.
- Partner with external and internal stakeholders to help generate diverse and qualified pools of candidates to fill mission-critical occupations; and, design and conduct targeted activities to promote individuals from all backgrounds, including sponsoring attendance in at least three job fairs designed to improve diversity, and veterans and disability hiring.
- Meet customer training needs by: 1) Expanding the Department's Training Cadre and Curriculum; 2) providing at least one webinar or management alert each quarter to increase awareness; 3) exploring on-line training or train-the-trainer opportunities on cultural competencies for bureau use (e.g., coordinate implementation plan for LGBTQ Cultural Competency Course and ensure an advertising campaign during the months related to LGBTQ Observances).
- Develop a communications and marketing plan that ensures managers and employees are educated on the Treasury personal assistance services (PAS) policy and procedures pursuant to the implementation of Treasury-wide PAS contract.
- Improve Treasury's external and internal websites related to EEO programs resulting in clear, accurate, informative, and user-friendly content.
- Evaluate Treasury's New Inclusion Quotient (IQ) Employee Viewpoint Survey (EVS) scores and participate in HR roundtables.
- Implement a customer satisfaction survey measuring effectiveness of EEO and D&I programs.
- Evaluate whether changes to SES processes as a result of the barrier analysis study have an impact on the diversity of the SES cadre.

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

I, **Mariam Harvey, Director, Office of Civil Rights and Diversity (ES-0260)**, am the

(Insert name above) (Insert official/title/series/grade above)

Principal EEO Director/Official for **Department of the Treasury**

(Insert Agency/Component Name above)

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

The agency has also analyzed its workforce 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 G. Harvey** Digitally signed by Mariam G. Harvey  
Date: 2020.05.14 10:28:09 -04'00'

05/14/2020

Signature of Principal EEO Director/Official

Date

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



Signature of Agency Head or Agency Head Designee

5/25/2020

Date

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## 715 - PART G Agency Self-Assessment Checklist

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

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

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





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

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

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**MD-715 - PART G**  
**Agency Self-Assessment Checklist**

<b>Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP</b>			
<b>This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.</b>			
 <b>Compliance Indicator</b>	<b>A.1 – The agency issues an effective, up-to-date EEO policy statement.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
 <b>Measures</b>			
<b>A.1.a</b>	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "yes", please provide the annual issuance date in the comments column. [see MD-715, II(A)]	No	Issued 10/2/2019
<b>A.1.b</b>	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]	Yes	Policy also covers parental status.
 <b>Compliance Indicator</b>	<b>A.2 – The agency has communicated EEO policies and procedures to all employees.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
 <b>Measures</b>			
<b>A.2.a</b>	Does the agency disseminate the following policies and procedures to all employees:		
<b>A.2.a.1</b>	Anti-harassment policy? [see MD 715, II(A)]	Yes	
<b>A.2.a.2</b>	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	Yes	
<b>A.2.b</b>	Does the agency prominently post the following information throughout the workplace and on its public website:	Yes	
<b>A.2.b.1</b>	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]	Yes	Treasury displays the name and contact information for bureau EEO officers. Bureaus display the specific bureau contact information. However, at each Treasury bureau, counseling is centralized. Therefore, bureaus post general contact information on who to contact to initiate a







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



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			Prevention of Sexual Harassment (POSH) training.
<b>A.2.c.5</b>	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If “yes”, please provide how often.	Yes	It is discussed in new employee and manager orientation sessions, included as part of the No FEAR Act training conducted every two years, and provided annually as part of the POSH training.
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>A.3 – The agency assesses and ensures EEO principles are part of its culture.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>A.3.a</b>	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.	Yes	Bureaus identified the Annual Rittenhouse Award, performance awards (mandatory diversity and inclusion (D&I) and supervisory performance goals), monetary and non-monetary group, and individual spot awards.
<b>A.3.b</b>	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Yes	
<b>Essential Element B: INTEGRATION OF EEO INTO THE AGENCY’S STRATEGIC MISSION</b> <b>This element requires that the agency’s EEO programs are structured to maintain a workplace that is free from discrimination and support the agency’s strategic mission.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.1.a</b>	Is the agency head the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]	No	
<b>B.1.a.1</b>	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If “yes,” please provide the title of the agency head designee in the comments.	Yes	OCRD’s Director reports to the Assistant Secretary for Management.
<b>B.1.a.2</b>	Does the agency’s organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes	
<b>B.1.b</b>	Does the EEO Director have a regular and	Yes	





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	effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]		
<b>B.1.c</b>	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comments column.	Yes	OCRD presented the FY 2018 State of the Agency (SOA) briefing to Agency Head designee on 04/30/2019.
<b>B.1.d</b>	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.2 – The EEO Director controls all aspects of the EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.2.a</b>	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]	<b>Yes</b>	
<b>B.2.b</b>	Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)]	<b>Yes</b>	Bureau EEO Officers are responsible for counseling in connection with their respective bureau EEO complaints of discrimination.
<b>B.2.c</b>	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	<b>Yes</b>	
<b>B.2.d</b>	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	<b>Yes</b>	
<b>B.2.e</b>	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	<b>Yes</b>	
<b>B.2.f</b>	Is the EEO Director responsible for periodically evaluating the entire EEO	<b>Yes</b>	

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





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



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



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<b>This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency's EEO Program and Plan.</b>			
 <b>Compliance Indicator</b>	<b>C.1 – The agency conducts regular internal audits of its component and field offices.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
 <b>Measures</b>			
<b>C.1.a</b>	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	Yes	Annually and before the submission of the bureau MD-715 reports to EEOC, OCRD evaluates their submissions and provides feedback on the status of deficiencies, implementation of planned activities to mitigate deficiencies, and recommends additional measures required to mitigate noted deficiencies. In FY 2019, OCRD conducted an audit review of Mint's (May - June) and IRS's (July - September) EEO, civil rights, and diversity and inclusion programs. Additionally, OCRD will conduct an Audit of FinCEN's, BEP's, and DO's EEO Programs during FY 2020.
<b>C.1.b</b>	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	Yes	Annually and before the submission of the bureau MD-715 reports to EEOC, OCRD evaluates their submissions and provides feedback on the status of deficiencies, implementation of planned activities to mitigate deficiencies and recommends additional measure required to mitigate noted deficiencies. In FY 2019, OCRD conducted an audit review of Mint's (May - June) and IRS's (July - September) EEO, civil rights, and diversity and inclusion programs. Additionally, OCRD will conduct an Audit of FinCEN's, BEP's and DO's Programs during FY 2020.
<b>C.1.c</b>	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	Yes	Following an Audit (within 6 months), bureaus are required to submit a compliance report to OCRD.

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 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.2.a</b>	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	
<b>C.2.a.1</b>	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes	
<b>C.2.a.2</b>	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	Yes	
<b>C.2.a.3</b>	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	
<b>C.2.a.4</b>	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [see Enforcement Guidance, V.C.]	Yes	
<b>C.2.a.5</b>	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <u>Complainant v. Dep't of Veterans Affairs</u> , EEOC Appeal No. 0120123232 (May 21, 2015); <u>Complainant v. Dep't of Defense (Defense Commissary Agency)</u> , EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.	No	The Bureau of Fiscal Service (FS) and Office of the Comptroller of the Currency (OCC) reported that they did not promptly conduct all inquiries within 10 days of notification. FS completed a PART H that will be submitted as part of their MD-715 report. OCC provided a comment on its PART G that the untimely initiation of inquiries was an anomaly due to extenuating circumstances for FY 2019 and no PART H would be prepared.





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<b>C.2.a.6</b>	Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR 1614.203(d)(2)]	Yes	
<b>C.2.b</b>	Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR 1614.203(d)(3)]	No	All Treasury bureaus, with the exception of IRS and TTB, reasonable accommodation (RA) policies have been updated, reviewed, and approved by OCRD. Those revisions were submitted to EEOC for review and approval. EEOC approved OCC's revised RA Policy and Procedures on 08/20/2019. In the interim, Treasury has directed bureaus to post interim policies and procedures pending EEOC's approval. Once approved, bureaus will replace their interim policies and procedures with the EEOC approved RA policies and procedures.
<b>C.2.b.1</b>	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]	Yes	
<b>C.2.b.2</b>	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	Yes	
<b>C.2.b.3</b>	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]	Yes	
<b>C.2.b.4</b>	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]	Yes	
<b>C.2.b.5</b>	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests in the comments column.	No	IRS reported that it timely processed 23% of its requests. IRS has prepared a PART H in their MD-715 report that addresses this matter.
<b>C.2.c</b>	Has the agency established procedures for	Yes	



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	processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]		
<b>C.2.c.1</b>	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.	Yes	<a href="https://www.treasury.gov/about/organizational-structure/offices/Mgt/Documents/PAS-Policy-and-Procedures-as-OCT-2018.pdf">https://www.treasury.gov/about/organizational-structure/offices/Mgt/Documents/PAS-Policy-and-Procedures-as-OCT-2018.pdf</a>
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.3.a</b>	Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	Yes	
<b>C.3.b</b>	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:		
<b>C.3.b.1</b>	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.]	Yes	
<b>C.3.b.2</b>	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	Yes	
<b>C.3.b.3</b>	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	Yes	
<b>C.3.b.4</b>	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	Yes	
<b>C.3.b.5</b>	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	Yes	
<b>C.3.b.6</b>	Provide disability accommodations when such accommodations do not cause an undue hardship? [ see 29 CFR §1614.102(a)(8)]	Yes	
<b>C.3.b.7</b>	Support the EEO program in identifying and removing barriers to equal opportunity. [see	Yes	





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	MD-715, II(C)]		
<b>C.3.b.8</b>	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]	Yes	
<b>C.3.b.9</b>	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	Yes	
<b>C.3.c</b>	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	Yes	
<b>C.3.d</b>	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.4.a</b>	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	Yes	
<b>C.4.b</b>	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	Yes	
<b>C.4.c</b>	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	Yes	
<b>C.4.d</b>	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	Yes	

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<b>C.4.e</b>	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:		
<b>C.4.e.1</b>	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	Yes	
<b>C.4.e.2</b>	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	Yes	
<b>C.4.e.3</b>	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Yes	
<b>C.4.e.4</b>	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	Yes	
<b>C.4.e.5</b>	Assist in preparing the MD-715 report? [see MD-715, II(C)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.5.a</b>	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)]	Yes	
<b>C.5.b</b>	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Yes	Three employees: two based on decisions from FAD’s and one from a civil court case.
<b>C.5.c</b>	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [see MD-715, II(C)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.6 – The EEO office advises managers/supervisors on EEO matters.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.6.a</b>	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715	Yes	The OCRD Director updates the Assistant Secretary for Management (ASM) as issues arise. The OCRD Director also participates in the ASM’s bi-weekly senior staff meetings. Additionally,





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	Instructions, Sec. I] If "yes", please identify the frequency of the EEO updates in the comments column.		diversity dashboards on Treasury and individual bureaus workforce demographics are provided to the ASM and Secretary on at least an annual basis.
<b>C.6.b</b>	Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I]	Yes	





**Essential Element D: PROACTIVE PREVENTION**

**This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.**

 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.1</b>	<b>D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.</b>		
<b>D.1.a</b>	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	Yes	
<b>D.1.b</b>	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I]	Yes	
<b>D.1.c</b>	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.2</b>	<b>D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)</b>		
<b>D.2.a</b>	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	Yes	
<b>D.2.b</b>	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR	Yes	

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	§1614.102(a)(3)]		
<b>D.2.c</b>	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	Yes	
<b>D.2.d</b>	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] If "yes", please identify the data sources in the comments column.	Yes	Complaint data through iComplaints and workforce data and exit survey data through Workforce and Monster Analytics. Information regarding Unions, reasonable accommodations, anti-harassment, as well as any other required information is provided by the bureaus' EEO and HR personnel upon request.
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.3 – The agency establishes appropriate action plans to remove identified barriers.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.3.a.</b>	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	Yes	
<b>D.3.b</b>	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	Yes	
<b>D.3.c</b>	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.4.a</b>	Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d)(4)] Please provide the internet address in the comments.	Yes	<a href="https://www.treasury.gov/about/organizational-structure/offices/Mgt/Pages/Affirmative-Action-Plan.aspx">https://www.treasury.gov/about/organizational-structure/offices/Mgt/Pages/Affirmative-Action-Plan.aspx</a>
<b>D.4.b</b>	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]	Yes	



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<b>D.4.c</b>	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]	Yes	
<b>D.4.d</b>	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)]	Yes	



**Essential Element E: EFFICIENCY**

**This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency's EEO programs and an efficient and fair dispute resolution process.**

 Compliance Indicator	<b>E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
 Measures			
<b>E.1.a</b>	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Yes	
<b>E.1.b</b>	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Yes	
<b>E.1.c</b>	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(l)?	Yes	
<b>E.1.d</b>	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(l)? If so, please provide the average processing time in the comments.	Yes	Treasury benchmark is to issue acceptance or dismissal letters no more than 30 days from file date. FY 2019 Averages: Acceptance letters were issued on average in 15 days; and Dismissal letters were issued on average in 24 days.
<b>E.1.e</b>	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	Yes	
<b>E.1.f</b>	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	Yes	
<b>E.1.g</b>	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	Yes	
<b>E.1.h</b>	When the complainant does not request a	Yes	

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	hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?		
<b>E.1.i</b>	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?	Yes	
<b>E.1.j</b>	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comments column.	Yes	OCRDC conducts bi-weekly meetings to review current status of all cases, discuss any instance where a case may be untimely and the reason for the untimeliness, and ensure there are no systemic problems in the process.
<b>E.1.k</b>	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes	
<b>E.1.l</b>	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.2 – The agency has a neutral EEO process.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.2.a</b>	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)]	Yes	
<b>E.2.b</b>	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If "yes", please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.	Yes	Legal sufficiency reviews are completed in Treasury's Office of General Counsel by an attorney who is not representing the Agency in the particular matter.
<b>E.2.c</b>	If the EEO office relies on the agency's defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]	Yes	
<b>E.2.d</b>	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	Yes	
<b>E.2.e</b>	If applicable, are processing time frames	Yes	







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	incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)]		
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.3.a</b>	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	Yes	
<b>E.3.b</b>	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Yes	
<b>E.3.c</b>	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	Yes	
<b>E.3.d</b>	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes	
<b>E.3.e</b>	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Yes	
<b>E.3.f</b>	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.4.a</b>	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:		
<b>E.4.a.1</b>	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	Yes	
<b>E.4.a.2</b>	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	Yes	
<b>E.4.a.3</b>	Recruitment activities? [see MD-715, II(E)]	Yes	
<b>E.4.a.4</b>	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-	Yes	

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	715, II(E)]		
<b>E.4.a.5</b>	The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]	Yes	Treasury recently procured a Treasury-wide system to process and track reasonable accommodation requests. The system is scheduled to go live in FY 2020.
<b>E.4.a.6</b>	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	Yes	
<b>E.4.b</b>	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.5.a</b>	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	EEOC annual reports, Complaint data, RA processing, exit survey results, FEVS results, analysis of workforce data by ERI, gender, disability, grades, occupation, hires, separations, awards, etc.
<b>E.5.b</b>	Does the agency review other agencies’ best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	Development of Workforce Analytics, Treasury’s automated data tool; Treasury-wide exit survey and analysis tool; Veteran and Disability Program “Be a Champion Roadshow”; use of internship program to establish a pipeline of diverse candidates for future employment; and, Veteran resume data base.
<b>E.5.c</b>	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Yes	
<b>Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE</b> <b>This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>

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<b>F.1.a</b>	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	Yes	
<b>F.1.b</b>	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	Yes	
<b>F.1.c</b>	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes	
<b>F.1.d</b>	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes	
<b>F.1.e</b>	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	Yes	

 <b>Compliance Indicator</b>	<b>F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
 <b>Measures</b>			
<b>F.2.a</b>	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	Yes	
<b>F.2.a.1</b>	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]	Yes	
<b>F.2.a.2</b>	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	Yes	
<b>F.2.a.3</b>	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR §1614.403(e)]	Yes	
<b>F.2.a.4</b>	Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes	

 <b>Compliance Indicator</b>	<b>F.3 - The agency reports to EEOC its program efforts and accomplishments.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>

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

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

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

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

**Statement of Model Program Essential Element Deficiency**

Type of Program Deficiency	Brief Description of Program Deficiency
C.2.b	<p>Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR 1614.203(d)(3)]</p> <p>As part OF EEOC's feedback on Treasury and it's bureaus FY 2017 affirmative action plans, EEOC identified that Treasury and some of its bureaus RA policies and procedures had not been reviewed and approved based on changes required by the updated 29 CFR 1614.203.</p>

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

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/01/2018	Ensure Treasury and its bureaus RA policies and procedures are in compliance with EEOC requirements and submitted to EEOC for final approval.	9/30/2019	9/30/2020	

**Responsible Official(s)**

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

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**Planned Activities Toward Completion of Objective**

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing? (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
08/30/2018	Require bureaus to submit updated RA policies and procedures to OCRD for review and comment.	Yes		08/24/2018
09/07/2018	OCRD will review bureau RA policies and procedures and make any recommended changes. Those RA policies and procedures requiring change will be returned to the appropriate bureau for corrections.	Yes		09/07/2018
01/30/2018	Once bureau RA policies and procedures are approved by OCRD, they will be submitted to EEOC for review and final approval.	Yes		01/30/2018
03/30/2018	Pending EEOC's final approval of bureau RA policies and procedures, Bureaus will post interim RA policies and procedures to internal and external websites.	Yes	09/30/2020	
03/30/2019	Once RA policies and procedures are approved by EEOC, bureaus post their EEOC approved RA policies and procedure to their internal and external.	Yes	09/30/2020	

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
<b>2018</b>	To date, OCRD has submitted the revised bureau RA policies and procedures to EEOC for BEP, FS, DO, IRS, Mint, OCC and TIGTA. EEOC reviewed and provided feedback to OCC on its RA policies and procedures. OCC resubmitted with revisions. OCRD continues to work with FinCEN, IRS-CC, OIG, SIGTARP, and TTB to finalize the revisions to their RA Policies and procedures.
<b>2019</b>	OCRD has submitted all bureau RA policies and procedures to EEOC with the exception of IRS. EEOC approved OCC's revisions for its RA policy and procedures. OCRD is currently working with IRS to finalize their revisions and the RA policy and procedures. Once finalized, OCRD will submit to EEOC for final review and approval. OCRD is currently waiting for EEOC's approval of the remaining bureaus.

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

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

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

**Statement of Model Program Essential Element Deficiency**

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

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

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/01/2018	Ensure initiation of inquiries processing of IRS reasonable accommodation requests.	9/30/2019	9/30/2020	
02/17/2019	Establish and implement a Treasury-wide reasonable accommodation tracking system.	9/30/2019	9/30/2020	

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

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

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<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing? (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
9/30/2019	Monitor implementation of IRS's planned activities to eliminate untimely processing of RA requests.	Yes	9/30/2020	
04/30/2019	Allocate budget for Treasury-wide RA tracking system.	Yes		04/04/2019
09/30/2019	Initiate procurement process to compete and award a RA tracking system contract.	Yes		09/24/2019
04/30/2020	Train RA Coordinators and transition bureaus to new RA Tracking system.	Yes		
05/29/2020	Implement RA tracking system.	Yes		

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
<b>2018</b>	N/A
<b>2019</b>	<p>IRS did not improve its timely processing of RA cases in FY 2019 (23% timely processed). As part of OCRD's oversight, an audit was conducted of IRS' EEO program from July to August 2019. Part of OCRD's findings was the untimely processing of RA requests. As a recommendation for corrective action, OCRD encouraged IRS to complete a Lean Sigma 6 study of its current processes to determine where process improvements need to be made to ensure the timely processing of accommodation requests.</p> <p>OCRD secured required funding for Treasury-wide RA tracking system and awarded the contract to MicroPact.</p>



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

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

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

**Statement of Model Program Essential Element Deficiency**

Type of Program Deficiency	Brief Description of Program Deficiency
<b>C.2.a.5</b>	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <u>Complainant v. Dep't of Veterans Affairs</u> , EEOC Appeal No. 0120123232 (May 21, 2015); <u>Complainant v. Dep't of Defense (Defense Commissary Agency)</u> , EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.

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

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/01/2019	Ensure Treasury and its bureaus conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process.	9/30/2020		

**Responsible Official(s)**

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

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**Planned Activities Toward Completion of Objective**

<b>Target Date</b> (mm/dd/yyyy)	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing?</b> (Yes or No)	<b>Modified Date</b> (mm/dd/yyyy)	<b>Completion Date</b> (mm/dd/yyyy)
10/01/2019	Monitor implementation of FS and OCC's planned activities to ensure prompt initiation (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process.	Yes		
10/01/2020	In FY 2020, OCRD will explore the procurement of a Treasury-wide Anti-Harassment Tracking System.	Yes		

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>

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

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

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

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

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

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
		Lower than expected participation rates for Women in the GS 13-15 and SES grade levels in the overall Treasury-wide workforce.

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

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

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

**Barrier Analysis Process**

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	<p><b>A-1:</b> Review of overall workforce participation rate for Women (61.56 percent in FY 2019) falls below the RCLF availability rate (64.98 percent).</p> <p><b>A4-1:</b> At the GS-13 grade level, the participation rate for women increased by 0.83 percent from 49.49 percent in FY 2009 to 50.32 percent in FY 2015. However, Treasury saw a 0.43 percent decreased participation rate for women at GS-13 grade level from FY 2015 (50.32 percent) to FY 2019 (49.89 percent). At the GS-14 grade level, the participation rate for women decreased by 0.78 percent from 47.44 percent in FY 2009 to 46.66 percent in FY 2015; the rate increased 0.07 percent in FY 2019 to 46.73 percent. At the GS-15 grade level, the participation rate for women increased by 2.22 percent from 44.65 percent in FY 2009 to 46.87 percent in FY 2015, but decreased by 1.04 percent from FY 2015 to FY 2019 (45.83 percent). Furthermore, at the SES level, the participation rate for women increased by 4.72 percent from 35.71 percent in FY 2009 to 40.43 percent in FY 2015, but decreased by 2.88 percent to 37.55 percent in FY 2019.</p> <p><b>A6:</b> A review of the Treasury workforce broken down by the major occupations shows that of the 13 most populous major occupations, the Women participation rate falls below the Occupational CLF (OCLF) availability rate in the following series:</p> <ul style="list-style-type: none"> <li>• 0301, Miscellaneous Administration and Program, Women participation (60.18 percent) falls below the OCLF availability rate of 63.30 percent;</li> <li>• 0340, Program Management, Women participation (58.36 percent) falls below the OCLF availability rate of 63.30 percent;</li> <li>• 0512, Internal Revenue Agent, Women participation (53.24 percent) falls below the OCLF availability rate of 64.20 percent;</li> <li>• 0570, Financial Institution Examining, Women participation (38.38 percent) falls below the OCLF availability rate of 45.30 percent;</li> <li>• 0962, Contact Representative, Women</li> </ul>

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
		<p>participation (71.71 percent) falls below the OCLF availability rate of 82.10 percent; and</p> <ul style="list-style-type: none"> <li>• 1169, Internal Revenue Officer, Women participation (57.95 percent) falls below the OCLF availability rate of 64.20 percent.</li> </ul> <p><b>A4-1:</b> Reviewing Table A4-1 for each occupation identified in the A6 Table as having lower than expected participation rates for Women:</p> <ul style="list-style-type: none"> <li>• <i>0301, Miscellaneous Administration and Program</i> At the GS-13 grade level, the participation rate for Women (61.43 percent) exceeds the availability rate (60.18 percent); however, at the GS-14, 15, and SES grade levels, the participation rate for Women (58.15 percent, 44.18 percent, and 22.94 percent respectively) fall below the availability rate of 60.18 percent.</li> <li>• <i>0340, Program Management</i> At the GS-13 grade level, the participation rate for Women (65.52 percent) exceeds the availability rate (58.36 percent); however, at the GS-14, 15, and SES grade levels, the participation rate for Women (57.46 percent, 51.58 percent, and 45.83 percent respectively) fall below the availability rate of 58.36 percent.</li> <li>• <i>0512, Internal Revenue Agent</i> At the GS-13, 15, and SES grade levels, the participation rate for Women (53.57 percent, 53.33 percent, and 100.00 percent respectively) exceeds the availability rate (53.24 percent); however, at the GS-14 grade level, Women participation (47.09 percent) falls below the availability rate of 53.24 percent.</li> <li>• <i>0570, Financial Institution Examining</i> At the GS-13 and 15 equivalent grade levels, the participation rate for Women (39.80 percent and 40.19 percent respectively) exceeds the availability rate (38.38 percent); however, at the GS-14</li> </ul>

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
		<p>and SES equivalent grade levels, the participation rate for Women (37.31 percent and 27.59 percent respectively) falls below the availability rate of 38.38 percent.</p> <ul style="list-style-type: none"> <li>• <i>0962, Contact Representative</i> There are no positions in Treasury in the 0962 series at the GS-13 and above grade level. All positions in the 0962 series are GS-11 and below.</li> <li>• <i>1169, Internal Revenue Officer</i> At the GS-13 and 14 grade levels, the participation rate for Women (54.96 percent and 47.52 percent respectively) fall below the availability rate (57.95 percent); however, at the GS-15 grade level, the participation rate for Women (60.00 percent) exceeds the availability rate of 57.95 percent. There are no positions for the 1169 series at the SES level.</li> </ul> <p><b>A7-1:</b> A review of the new A7-1 Table shows the new hire and internal competitive promotions for GS-13 through 15 and SES grade levels.</p> <p><u>GS-13</u>  <i>New Hires:</i> For GS-13 new hires, the participation rate for Women applicants was 43.19 percent, which fell to 42.50 percent at the qualified stage of the application process. The participation rate for Women continued to fall at the referred stage of the process where the participation rate for Women was 39.88 percent. The participation rate for Women increased at the interviewed stage of the process (48.59 percent), but fell again to 45.18 percent at the selected stage.</p> <p><i>Internal Competitive Promotions:</i> For GS-13 internal competitive promotions, the participation rate for Women applicants was 64.27 percent, and stayed at 64.14 percent at the qualified stage. The participation rate dropped at the referred stage to 62.17 percent, and fell again at the interviewed stage (61.47 percent) but increased at the selection stage to 62.27 percent.</p>

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
		<p><u>GS-14</u>  <i>New Hires:</i> For GS-14 new hires, the participation rate for Women applicants was 40.11 percent, which decreased slightly to 40.01 percent at the qualified stage of the application process. The participation rate for Women dropped at the referred stage of the process to 39.54 percent. The participation rate for Women increased at the interviewed stage of the process (46.76 percent), and dropped again to 40.18 percent at the selected stage.</p> <p><i>Internal Competitive Promotions:</i> For GS-14 internal competitive promotions, the participation rate for Women applicants was 56.68 percent, and slightly increased to 57.65 percent at the qualified stage. The participation rate remained at 57.25 percent at the referred stage, and increased at the interviewed stage (64.75 percent). The participation rate decreased at the selection stage to 57.81 percent.</p> <p><u>GS-15</u>  <i>New Hires:</i> For GS-15 new hires, the participation rate for Women applicants was 31.65 percent, which reduced to 31.03 percent at the qualified stage of the application process. The participation rate for Women increased at the referred stage of the process to 35.94 percent. The participation rate for Women increased at the interviewed stage of the process (50.00 percent), and dropped again to 46.50 percent at the selected stage.</p> <p><i>Internal Competitive Promotions:</i> For GS-15 internal competitive promotions, the participation rate for Women applicants was 49.55 percent, and increased to 52.73 percent at the qualified stage. The participation rate increased again to 54.07 percent at the referred stage, and decreased at the interviewed stage (35.71 percent). The participation rate increased at the selection stage to 62.50 percent.</p> <p><u>SES</u></p>

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
		<p><i>New Hires:</i> For SES new hires, the participation rate for Women applicants was 33.31 percent, which reduced to 32.63 percent at the qualified stage of the application process. The participation rate for Women continued to decrease at the referred stage of the process where the participation rate for Women was 30.35 percent. The participation rate for Women increased at the interviewed stage of the process (55.26 percent), and dropped again to 45.24 percent at the selected stage.</p> <p><b>A8:</b> A review of new hire workforce data shows that in FY 2019, 60.35 percent of Treasury new hires were Women, falling below the RCLF availability rate of 64.98 percent.</p> <p><b>A8S:</b> A review of new hire data by those major occupations identified in the A6 and A4-1 shows that:</p> <ul style="list-style-type: none"> <li>• <i>0301, Miscellaneous Administration and Program</i> At the GS-13, 14, 15, and SES grade levels, the participation rate for Women new hires (58.82 percent, 16.67 percent, 30.77 percent, and 15.00 percent respectively) fall below the OCLF availability rate of 63.30 percent.</li> <li>• <i>0340, Program Management</i> In FY 2019, all hires in the 0340 series were at the SES grade level. Of those hires, 23.08 percent were Women, falling below the OCLF availability rate of 63.30 percent.</li> <li>• <i>0512, Internal Revenue Agent</i> At the GS-13 grade level, the participation rate for Women new hires (61.40 percent) fell below the OCLF availability rate of 64.20 percent. There were no hires for the GS-14 and above grade levels.</li> <li>• <i>0570, Financial Institution Examining</i> At the GS-13 equivalent grade level, the participation rate for Women new hires (50.00 percent) exceeded the OCLF availability rate (45.30 percent). At the</li> </ul>



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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
		<p>GS-14 and 15 equivalent grade levels, the participation rate for Women new hires (20.00 percent and 0.00 percent respectively) fell below the OCLF availability rate (45.30 percent).</p> <ul style="list-style-type: none"> <li>• <i>1169, Internal Revenue Officer</i> In FY 2019, the participation rate for Women new hires (60.00 percent) fell below the OCLF availability rate of 64.20 percent.</li> </ul> <p><b>A14:</b> Review of separation data for the Treasury workforce shows that 70.59 percent of all Involuntary separations were Women, exceeding the workforce availability rate of 61.56 percent. Similarly, 64.72 percent of all voluntary separations were Women, which also exceeds the workforce availability rate (61.56 percent).</p> <p><b>A14S2:</b> A review of new separation data by those major occupations identified in the A6 and A4-1 shows that:</p> <ul style="list-style-type: none"> <li>• <i>0301, Miscellaneous Administration and Program</i> At the GS-13, 14, 15, and SES grade levels, the participation rate for Women separations (55.88 percent, 52.78 percent, 48.72 percent, and 25.00 percent respectively) fall below the availability rate of 60.18 percent.</li> <li>• <i>0340, Program Management</i> At the GS-13, 14, and SES grade levels, the participation rate for Women separations (75.00 percent, 66.67 percent, and 62.50 percent respectively) exceed the availability rate of 58.36 percent. At the GS-15 grade levels, the participation rate for Women separations (48.78 percent) falls below the availability rate (58.36 percent).</li> <li>• <i>0512, Internal Revenue Agent</i> At the GS-13 and 14 grade levels, the participation rate for Women separations (45.24 percent and 48.85 percent) fall</li> </ul>

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
		<p>below the availability rate of 53.24 percent. At the GS-15 grade level, the participation rate for Women separations (100.00 percent) exceeded the availability rate of 53.24 percent.</p> <ul style="list-style-type: none"> <li>• <i>0570, Financial Institution Examining*</i> At the GS-13, 14, 15, and SES grade levels, the participation rate for Women separations (39.68 percent, 41.38 percent, 38.89 percent, and 66.67 percent respectively) exceed the availability rate (38.38 percent).</li> <li>• <i>0962, Contact Representative</i> In FY 2019, all separations in the 1169 series were in the GS-11 and below grade levels.</li> <li>• <i>1169, Internal Revenue Officer</i> At the GS-13 grade level, the participation rate for Women separations (44.19 percent) fell below the availability rate (57.95 percent); however, at the GS-14 and 15 grade levels, the participation rate for Women separations (66.67 percent and 100.00 percent respectively) exceeded the availability rate (57.95 percent).</li> </ul>
Complaint Data (Trends)	Yes	<p>In FY 2019, 395 formal complaints were filed with the Department; of those 395, 85 (21.52 percent) identified Sex (Female) as one of the bases for the complaint.</p> <p>In FY 2019, of the 76 complaints that reached Settlement, 16 (21.05 percent) identified Sex (Female) as one of the basis for the complaint.</p>
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	No	
Focus Groups	No	

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	No	

**Status of Barrier Analysis Process**

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

**Statement of Identified Barrier(s)**

Description of Policy, Procedure, or Practice
Barrier Analysis not yet identified.

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

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Increase participation rates for Women in the GS-13 through 15 and SES grade levels.	09/01/2019	09/30/2021	Yes		

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
12/30/2019	Reach out to EEO Officers for those bureaus		12/20/2019

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<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
	(DO and IRS) with noted decrease in the participation rate of Women in SES and GS-15 feeder pools to request a barrier analysis study be implemented in FY 2020.		
06/30/2020	Review Exit Interview and FEVS data results for FY 2015 through FY 2020 to identify trends for Women perceptions in the workforce.		
07/30/2020	Reach out to Bureau EEO Officers to coordinate with their HR Offices to identify Grievance data trends for FY 2018 through FY 2020.		
09/30/2020	Identify a high level Treasury Barrier Analysis Team, a working group that leverages the expertise of members of the OCRD, Human Resources, and Bureau EEO Offices to more closely identify barriers to Women participation in the GS-13 and above grade levels.		
12/30/2020	Treasury Barrier Analysis Team will create a plan that guides critical phases (analysis, methods, resources, senior leadership support).		
03/30/2021	Treasury Barrier Analysis Team will implement plan.		
05/31/2021	Treasury Barrier Analysis Team will collect data.		
07/30/2021	Treasury Barrier Analysis Team will analyze and report data.		
09/30/2021	Treasury Barrier Analysis Team create additional action plan to eliminate identified barrier(s).		
09/30/2021	Clarify next steps.		

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>

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**MD-715 – Part J**  
**Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities**

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

**Section I: Efforts to Reach Regulatory Goals**

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

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

The participation rate for PWD at the GS-11 to SES grade cluster is 10.86% for FY 2019, which falls below the 12% goal.

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

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

The Department provides Treasury's leadership updates on the participation, grade distribution, hiring, and separations of PWD and PWTD, allowing leadership to make informed decisions on how the Department is doing towards meeting the established goals for PWD and PWTD. A Diversity Dashboard was developed with PWD and PWTD workforce data compared against the established PWD and PWTD benchmarks for Bureau leadership, as well as hiring managers and supervisors.

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

**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  No

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	77	3	24	See specific bureau PART J's.
Answering questions from the public about hiring authorities that take disability into account	59	3	13	See specific bureau PART J's.
Processing reasonable accommodation requests from applicants and employees	49	3	12	See specific bureau PART J's.
Section 508 Compliance	145	1	3	See specific bureau PART J's.
Architectural Barriers Act Compliance	20	2	379	See specific bureau PART J's.
Special Emphasis Program for PWD and PWTD	14	1	5	See specific bureau PART J's.
<b>Note:</b> Treasury provides a consolidated count where applicable; however, due to its size, a notation “See specific bureau PART J’s” was added to assist in identifying bureau responsible official.				

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- 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  No

In FY 2019, OCRD provided multiple training sessions to the bureau’s disability program staff on PARTJ and the use of the MD-715 V2 workforce data tables. OCRD and the Department’s Disability Program Managers also participated in the quarterly Federal Exchange on Employment and Disability (FEED) updates, hosted by EEOC and Department of Labor, which educate attendees on various issues and topics related to disability. Treasury HR and EEO professionals completed an annual Department of the Treasury online course, mandated by Executive Order (EO) 13518, related to veteran’s employment, with critical components on disability. Additionally, HR representatives attended a reasonable accommodation (RA) refresher course, which includes a disability component.

**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  No

**Section III: Plan to Recruit and Hire Individuals with Disabilities**

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

**A. Plan to Identify Job Applicants with Disabilities**

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

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



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- 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 PWTB for positions in the permanent workforce.**

Schedule A Hiring Authority is promoted and available for use along with Veteran Appointment Authorities to non-competitively appoint PWD/PWTB and veterans with a service-connected disability rating of 30% or more. The Treasury and Bureau Disability Program Managers (DPM) have established numerous external partnerships with private and public organizations that assist PWD/PWTB candidates in finding meaningful employment, such as Gallaudet University, Workforce Recruitment Program, State Vocational Rehabilitation Centers, Texas School for the Deaf, and Careers and the Disabled Expos. The Department promotes the "Be A Champion" initiative to remind hiring managers of the value of hiring applicants with disabilities.

- 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 utilize the Schedule A Hiring Authority, the process for eligibility and hire encompass: 1) Application qualification review process – conducted by the servicing HR Specialist who confirms that the applicants meet the qualification requirements of the announced position and have provided required proof of disability; 2) Applicant referral - individuals deemed qualified are referred to the hiring manager on a Schedule A certificate of eligibility with guidance on selection procedures, including the application of veterans' preference, when applicable. Managers have the option to interview and/or hire from the Schedule A certificate or to consider other candidates from other issued certificates (Merit Promotion, Non-Competitive, Veterans' Recruitment Appointment (VRA), etc.).

Alternatively, when individuals submit their resumes directly to the Special Placement Program Coordinator (SPPC) for vacant positions, the SPPC refers the resumes to the hiring official for review and consideration. The hiring official forwards the selected resumes to the HR Specialist to determine qualifications. If qualifications and Schedule A eligibility are met, the resumes are then 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

All Treasury managers, supervisors, and selected HR professionals are required to complete Supervisory Readiness, Annual Training on Merit System Principals, Prohibited Personnel Practices, and Whistleblower, and the Veteran's Employment Training which contain segments on the use of hiring authorities and are provided online through the Treasury's Integrated Talent Management System (ITMS). Additionally, hiring managers are offered the Americans with Disability Act: An Overview for Managers and A Manager's Guide to Diversity, Inclusion and Accommodations, along with other hiring manager tools available through ITMS.

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**B. Plan to Establish Contacts with Disability Employment Organizations**

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

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

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

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

The existing sign language interpreter contract ends in FY 19, therefore the Department is exploring a new sign language interpreter contract to provide an effective and efficient procedure for providing sign language interpreters beginning FY 20.

**C. Progression Towards Goals (Recruitment and Hiring)**

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

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

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

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

<b>FY 2019 New Hires</b>	<b>Qualified vs. New Hires</b>	<b>Qualified vs. New Hires</b>
0110 (44)	PWD: 5.48% - 2.27%***	PWTD: 3.39% - 0.00%***
0340 (13)	PWD: 4.02% - 7.69%	PWTD: 0.54% - 7.69%
0343 (76)	PWD: 7.56% - 28.95%	PWTD: 3.42% - 1.32%**
0501 (29)	PWD: 5.68% - 13.79%	PWTD: 2.36% - 3.45%
0511 (22)	PWD: 8.12% - 0.00%***	PWTD: 3.50% - 0.00%***
0570 (66)	PWD: 4.90% - 4.55%**	PWTD: 1.29% - 1.52%

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0905 (102)	PWD: 5.91% - 2.94%**	PWTD: 2.36% - 0.00%**
1169 (269)	PWD: 6.33% - 20.07%	PWTD: 3.29% - 4.09%
1811 (99)	PWD: 2.55% - 3.03%	PWTD: 1.31% - 0.97%*
2210 (755)	PWD: 7.80% - 18.81%	PWTD: 4.03% - 2.78%**

The above triggers were identified as a result of analyzing the above data for new hires by occupational series and permanent mission-critical occupations:

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

\*\*Other triggers were noted in the 0343, 0570, 0905, and 2210 occupational series when comparing the qualified applicant flow data with the new hires for PWD and PWTD. There was an overall increase in the number of 0343 new hires in the last year; and although there was a trigger for PWTD, there was a higher rate of actual selections than the prior year. A slight difference of 0.34% was noted for 0570 occupational series, however, that difference is not significant enough to be considered a critical trigger at this time. The triggers noted in the 0905 occupational series were consistent to the prior year for both PWD and PWTD. A new trigger was noted for the 2210 occupational series for PWTD. For the Treasury bureaus that noted the same triggers in their workforce evaluation, these triggers are noted in their PART J's. Plans to improve hiring for PWD/PWTD within the major occupations listed are detailed in the specific bureau PART J's. Treasury will monitor all bureaus' PART J's to ensure appropriate plans are developed to eliminate any identified barrier(s).

\*\*\* When there is limited hiring, there cannot be a realistic expectation that all groups (PWD and PWTD) would be hired at rates comparable to their qualification rates. Therefore, Treasury established a threshold of 50 new hires. Any hire rate less than 50 will not support a statistically significant outcome. Occupations with limited hiring such as the 0511 did not have enough hires to determine if there is an actual trigger. (\*1811 is an exception as stated above). However those differences are less than 1% and not considered triggers at this time.

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

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

<b>MCO</b>	<b>Relevant Applicant Pool vs. Qualified Internal Applicants</b>	<b>Relevant Internal Applicants Pool vs. Qualified Internal Applicants</b>
0110 (23)	PWD: 8.33% - 0.00%	PWTD: 0.00% - 0.00%
0340 (303)	PWD: 3.96% - 3.45%**	PWTD: 0.57% - 0.37%**
0343 (76)	PWD: 5.93% - 5.94%	PWTD: 2.74% - 2.73%**
0501 (715)	PWD: 5.90% - 5.92%	PWTD: 2.72% - 2.72%
0511 (29)	PWD: 4.00% - 4.17%	PWTD: 0.00% - 0.00%
0570 (1)	PWD: 3.48% - 3.42%**	PWTD: 0.99% - 0.92%**
0905 (4)	PWD: 0.00% - 0.00%	PWTD: 0.00% - 0.00%
1169 (343)	PWD: 5.45% - 5.41%	PWTD: 2.57% - 2.58%**
1811 (890)	PWD: 0.51% - 0.00%	PWTD: 0.51% - 0.00%*

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2210 (179)      PWD: 10.43% - 9.69%\*\*                      PWTD: 4.33% - 4.52%\*\*

The below triggers were identified when analyzing the above data for permanent mission-critical occupations among qualified internal applicants:

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

\*\*We noted differences when comparing the applicant flow data with the qualified applicants for PWD and PWTD in the 0340, 0343, 0570, 1169, and 2210 occupational series. However, those differences are less than 1% and not considered triggers at this time.

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

**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

<b>FY 2019 Promotions to MCOs</b>	<b>Qualified Internal Applicants vs. Internal Promotions</b>	<b>Qualified Internal Applicants vs. Internal Promotions</b>
0110 (23)	PWD: 0.00% - 13.04%***	PWTD: 0.00% - 4.35%***
0340 (303)	PWD: 3.45% - 10.56%	PWTD: 0.37% - 1.98%
0343 (76)	PWD: 5.94% - 8.94%	PWTD: 2.73% - 2.10%**
0501 (715)	PWD: 5.92% - 9.65%	PWTD: 2.72% - 3.36%
0511( 29)	PWD: 4.17% - 3.45%***	PWTD: 0.00% - 0.00%
0570 (1)	PWD: 3.42% - 0.00%***	PWTD: 0.99% - 0.00%***
0905 (4)	PWD: 0.00% - 0.00%	PWTD: 0.00% - 0.00%
1169 (343)	PWD: 5.41% - 8.16%	PWTD: 2.57% - 0.87%**
1811 (89)	PWD: 0.00% - 1.12%	PWTD: 0.51% - 0.00%*
2210 (379)	PWD: 9.69% - 18.73%	PWTD: 4.33% - 5.01%

The below new triggers were identified when analyzing the above data for qualified internal applicants among employees promoted to a mission-critical occupation:

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

\*\*Other triggers were noted in the 0343, 0511, 0570, and 1169 occupational series above when comparing the qualified applicant flow data with the new hires for PWD and/or PWTD. There was a significant decrease in the number of 0343 new hires compared to last year; and although there is a trigger for PWTD, the difference is less than 1% and not considered a trigger. Plans to improve hiring for PWD/PWTD within the major occupations listed are detailed in the specific bureau PART J's. Treasury will monitor all bureaus' PART J's to ensure appropriate plans are developed to eliminate any

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identified barrier(s).

\*\*\* When there is limited hiring, there cannot be a realistic expectation that all groups (PWD and PWTD) would be hired at rates comparable to their qualification rates. Therefore, Treasury established a threshold of 50 new hires. Any hire rate less than 50 will not support a statistically significant outcome. Occupations with limited hiring such as the 0110, 0511, 0570, and 0905 series did not have enough hires to determine if there is an actual trigger. (\*1811 occupational series is an exception as stated above). However those differences are less than 1% and not considered triggers at this time.

While there were internal vacancy announcements that reflect the applicant flow data, the significant difference in the percentage of the Qualified Internal Applicant Pool and the Internal Promotions are the result of existing employees who applied to not only internal vacancy announcements, but to all status vacancy announcements open to all Federal employees in FY 2019. This will also result in differences between internal/external selections and promotions rates.

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

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

### **A. Advancement Program Plan**

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

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

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

Treasury encourages diverse employee (including PWD/PWTD) participation in management, leadership and career development programs through the use of employee network groups (ENGs), such as the Adelante and the Veterans Employee Resource Group (VERG), and a variety of other communication venues throughout the agency. Developmental opportunities are broadly communicated to all employees through internal weekly and monthly newsletters, intranet website postings, and shared by ENGs.

Treasury encourages individual development plans for all employees. Managers are reminded to consider permanently assigned PWD/PWTD for development opportunities as part of their Individual Development Planning process.

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

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## **B. Career Development Opportunities**

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

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

**Bureau of Engraving and Printing (BEP)** offers a series of programs for GS 7-15. Programs include:

- **New Leaders Program (NLP)** – Targets GS 7-11 employees (or equivalent) and focuses on developing future public service leaders and includes leadership self-assessments, experiential learning, and individual development opportunities integrated into a competency-based learning approach.
- **Executive Leadership Program (ELP)** – Targets GS 12-13 employees (or equivalent), who are seeking to support their organization in meeting its mission and goals, by focusing specifically on the competency of “leading people” through developmental activities and experiences.
- **Executive Potential Program (EPP)** – A competency-based leadership program that prepares high-potential GS 14-15 employees (or equivalent) to lead effectively at the senior level. The curriculum is focused on “leading change” and transforming senior managers into change leaders.
- **Career Development (CADE) Program** – The CADE Program provides upward mobility via defined career training and opportunities that allow the selection and training of disabled veterans (and other employees) GS-11 (or equivalent) and below, whose positions offer limited promotion potential, for placement into positions in other occupational series for which they would not otherwise be qualified.
- **Electro-Machinist & Mechanical-Machinist Trainee Program** - This program is advertised as a four-year trainee program to journeyman Electro-Machinist. This position is located in the Electro-Machine Shop, Office of Security Printing. The incumbent participates in a four year training program with the Bureau of Engraving and Printing including formal, laboratory, and "on-the-job" training. The incumbent is normally assigned to maintain/support all currency printing/processing equipment, including temporary and permanent modifications and installations required to maintain production goals. The incumbent works with journeymen and other peers, while participating in "on-the-job" training.

**Departmental Offices (DO)** partners with the Treasury Executive Institute (TEI) to offer employees individual coaching services for a six-month period. TEI’s coaching services assist DO employees with achieving professional goals, solve individual leadership challenges, and develop leadership attributes.

**Fiscal Service (FS)** offers developmental programs for employees to take classes to make them eligible for promotion to higher grades in their career ladder. Fiscal Service also offers career development classes in person and online that enable employees to develop skills to help them advance and qualify for other positions in Fiscal Service.

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

**U.S. Mint** offers Manufacturer Certification and Apprenticeship Program and Operator Certification and Apprenticeship programs which are available to PWD and PWTD.

**Office of the Comptroller of the Currency (OCC)** offers professional development programs for its bank

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examiners and cross-training and developmental assignments to equip attorneys with legal skills and experiences across multiple legal practices areas through the Honors Attorney Program. Overall, training and development courses are available to all employees, in the classroom, online, virtual, and self-study. Temporary details and short-term work assignments are advertised on the agency's Opportunities Board to all employees, such as:

- The EXCEL I Program, sponsored by the Large Bank Supervision (LBS) department, provides bank examiners in pay band NB-V the opportunity to develop expertise in one of eight specialty areas.
- The EXCEL II Program expanded professional development opportunities for bank examiners in pay band NB-IV in the eight specialty areas of the EXCEL I Program.
- Midsize and Community Bank Supervision (MCBS) Pre-commission Bank Examiners Career Forums provide information about bank examiner career opportunities and explain the Uniform Commission Examination (UCE) preparatory process.
- The Honors Attorney Program is designed to provide cross-training and developmental assignments to equip attorneys with legal skills and experiences across multiple legal practices areas.
- The Leadership Exploration and Development (LEAD) Program is an enterprise-wide leadership development program targeted to employees at the NB-V to NB-VI.2 levels, to help develop specific competencies aligned to skills and abilities needed at the team leader and/or manager level.
- The MCBS NB-V Career Forum for Bank Examiners provides bank examiners exposure to the career options available in the various bank supervision lines of business, and resources and factors to consider when making career decisions. It also provides opportunities to network with senior leaders throughout the agency.
- Non-examiner Career Forums provide non-examiners exposure to the variety of career options in the non-examiner lines of business.
- Agency training and development courses are available to all employees via the classroom, online, virtual, and self-study.

**Treasury Inspector General for Tax and Alcohol (TIGTA)** programs include:

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

**Alcohol and Tobacco, Tax and Trade Bureau (TTB)** primary career development program (CDP) is the Emerging Leaders Program (ELP) – a three year centralized training program that is competitive with selections made at the Assistant Administrator level. During the 4th quarter of each fiscal year, TTB broadcasts an ELP annual opportunity announcement to request applicants for the Program. The announcement provides general information about the ELP and its three programs, identifies the three-year curriculum for each program, and explains how employees may apply. The TTB ELP framework consists of three separate and distinct programs:

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

Further:

- All TTB employees, including disabled veterans, are eligible for consideration for the ELP and may





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

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

**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 (19.25%) and PWTD (19.19%) in cash awards \$1,000 - \$1,999, was below the inclusion rate for employees with no disability (27.42%).

The inclusion rate for PWD (2.19%) and PWTD (1.56%) in cash awards \$2,000 - \$2,999, was below the inclusion rate for employees with no disability (3.51%).

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

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

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

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**D. Promotions**

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

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

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

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

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	<b>Qualified Internal Applicant</b>	<b>Internal Promotions</b>
GS-15 PWTB:	3.19%	1.16%*
SES PWTB:	0.51%	0.00%*

Triggers were identified for PWTB when analyzing Qualified Internal Applicants and Selectees for Promotion to senior grade levels, indicating the following results:

\*A trigger was identified for PWTB who were promoted to the SES and GS-15. The trigger was noted between the rate at which applicants were qualified and their rate of selection. For Treasury bureaus that noted triggers in their workforce, evaluations are noted in their PART J's. Plans to improve hiring for PWTB within the grade groupings are detailed in the specific bureau PART J's. Treasury will monitor all bureaus' PART J's to ensure appropriate plans are developed to eliminate any identified barriers.

While there were internal vacancy announcements that reflect the applicant flow data, the significant difference in the percentage of the Qualified Internal Applicant Pool and the Internal Promotions are the result of existing employees who applied to not only internal vacancy announcements, but to all status vacancy announcements open to all Federal employees in FY 2019. This will also result in differences between internal/external selections and promotions rates.

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

e. New Hires to SES (PWD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
f. New Hires to GS-15 (PWD)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
g. New Hires to GS-14 (PWD)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
h. New Hires to GS-13 (PWD)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

	<b>Qualified External Applicants</b>	<b>External Hires</b>
GS-13 PWD:	7.11%	16.89%
GS-14 PWD:	6.44%	15.59%
GS-15 PWD:	6.98%	11.49%
SES PWD:	7.48%	6.98%*

A trigger was identified for PWD when analyzing Qualified Internal Applicants and Selectees for Promotion to senior grade levels, indicating the following results:

\*We noted differences when comparing the qualified external applicants with the external hires for PWD in the SES. However the difference is less than 1% and not considered a trigger at this time.

For Treasury bureaus that noted triggers in their workforce, evaluations are noted in their PART J's. Plans to improve hiring for PWD within the grade groupings are detailed in the specific bureau PART J's. Treasury will monitor all bureaus' PART J's to ensure appropriate plans are developed to eliminate any identified barriers.

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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.

i. New Hires to SES (PWTD)	Yes 0	No X
j. New Hires to GS-15 (PWTD)	Yes 0	No X
k. New Hires to GS-14 (PWTD)	Yes X	No 0
l. New Hires to GS-13 (PWTD)	Yes X	No 0

	Qualified External Applicants	External Hires
GS-13 PWTD:	3.26%	2.14%**
GS-14 PWTD:	2.87%	2.63%*
GS-15 PWTD:	3.45%	3.45%
SES PWTD:	2.85%	6.98%

Triggers were identified for PWTD when analyzing Qualified External Applicants and Selectees for External Hires to senior grade levels, indicating the following results:

\*We noted differences when comparing the qualified external applicants with the external hires for PWTD in the GS-14 grade levels. However, the difference is less than 1% and not considered a trigger at this time.

\*\*Treasury noted a trigger between the qualified external applicants and the actual hires in the GS-13 grade level.

For Treasury bureaus that noted triggers in their workforce, evaluations are noted in their PART J's. Plans to improve hiring for PWTD within the grade groupings are detailed in the specific bureau PART J's. Treasury will monitor all bureaus' PART J's to ensure appropriate plans are developed to eliminate any identified barriers.

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.

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- a. Executives
  - i. Qualified Internal Applicants (PWD)                      Yes 0                      No X
  - ii. Internal Selections (PWD)                                      Yes 0                      No X
- b. Managers
  - i. Qualified Internal Applicants (PWD)                      Yes 0                      No X
  - ii. Internal Selections (PWD)                                      Yes 0                      No X
- c. Supervisors
  - i. Qualified Internal Applicants (PWD)                      Yes 0                      No X
  - ii. Internal Selections (PWD)                                      Yes 0                      No X

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

- a. Executives
  - i. Qualified Internal Applicants (PWTD)                      Yes 0                      No X
  - ii. Internal Selections (PWTD)                                      Yes 0                      No X
- b. Managers
  - i. Qualified Internal Applicants (PWTD)                      Yes 0                      No X
  - ii. Internal Selections (PWTD)                                      Yes 0                      No X
- c. Supervisors
  - i. Qualified Internal Applicants (PWTD)                      Yes 0                      No X
  - ii. Internal Selections (PWTD)                                      Yes 0                      No X

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

<b>Supervisory Positions</b>	<b>Qualified External Applicants</b>	<b>New Hires</b>
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Executives PWD:	6.99%	2.45%*
Managers PWD:	8.98%	7.45%*
Supervisors PWD:	5.00%	0.00%**

Triggers were identified for PWD when analyzing Qualified External Applicants and New Hires to supervisory positions, indicating the following results:

\* We noted differences when comparing the qualified external applicants with the new hires for PWD at the Executives and Managers level.

\*\* Treasury noted a trigger between the Qualified External Applicants and New Hires to the Supervisors level, however, the non-selection of 1 qualified Supervisory external applicant at 5% would not warrant further analysis at this time.

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

**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.**

m. New Hires for Executives (PWTD)	Yes X	No 0
n. New Hires for Managers (PWTD)	Yes X	No 0
o. New Hires for Supervisors (PWTD)	Yes 0	No X

<b>Supervisory Positions</b>	<b>Qualified External Applicants</b>	<b>New Hires</b>
Executives PWTD:	2.69%	1.96%*
Managers PWTD:	4.10%	3.19%*
Supervisors PWTD:	0.00%	0.00%

Triggers were identified for PWTD when analyzing Qualified External Applicants and New Hires to supervisory positions, indicating the following results:

\* We noted differences when comparing the qualified external applicants with the new hires for PWTD at the Executives and Managers level. However, for each, the difference is less than 1% and not considered a trigger at this time.

For Treasury bureaus that noted triggers in their workforce, evaluations are noted in their PART J's. Plans to improve hiring for PWTD within the grade groupings are detailed in the specific bureau PART J's. Treasury will monitor all bureaus' PART J's to ensure appropriate plans are developed to eliminate any identified barriers.

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## 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 2019, Treasury had 34 Schedule A employees with a disability who were eligible to convert into the competitive service after two years of satisfactory service. Of the 34 eligible Schedule A employees, 17 were not converted timely. This is a 29% increase in untimely conversions compared to 5 eligible employees not converted timely in FY18. Treasury bureaus indicated the following status for the 17 eligible Schedule A employees, who were not converted timely:

- Ten (10) employees’ conversions were submitted and processed late;
- One (1) employee was not converted because the employee misunderstood the conversion and declined. However, after sharing information regarding Schedule A conversion, the conversion is now pending in HR;
- One (1) employee’s conversion was still pending at the time of this report since eligibility was at the end of this FY;
- One (1) employee is pending performance improvement;
- Three (3) were based on unsatisfactory performance; and
- One (1) employee was terminated for unsatisfactory performance.

Note: The above consolidated view of data may mask the potential barrier(s) in the processes within the independent bureaus. Therefore, bureaus are required to analyze their data for trigger(s) that lead to a potential barrier and develop a separate plan(s) to address the notable deficiencies, such as bureau level conversions. The Department monitors each bureau’s progress and provides guidance (quarterly/annually) that will assure a clear path for timely conversions of all eligible Schedule A candidates with a disability into the competitive service, after two years.

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 (10.39%) exceeded the inclusion rate of persons without disability (8.74%) for voluntary separations.

The inclusion rate for PWD (0.96%) exceeded the inclusion rate of persons without disability (0.76%) for involuntary separations.

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When evaluating the types of voluntary separations, we noted that 53% were due to retirement, 8% were transfers, and 37% were resignations. The remaining 2% were due to deaths. Based on comments in the FY 19 Treasury Employee Exit Survey and the explanation cited below in question #4, Treasury does not consider the separations “due to retirement” a trigger. However, each bureau where a trigger has been identified will be asked to evaluate those voluntary separations due to retirements, transfers and resignations, along with information gleaned from their exit survey, to determine if these triggers are potential barriers.

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

The (inclusion rate) for PWTD (10.99%) exceeded the rate of persons without targeted disability (8.74%) for voluntary separations.

The (inclusion rate) for PWTD (1.16%) exceeded the rate of persons with without targeted disability (0.76%) for involuntary separations.

When evaluating the types of voluntary separations, we noted that 53% were due to retirement, 8% were transfers, and 37% were resignations. The remaining 2% were due to deaths. Based on comments in the FY 19 Treasury Employee Exit Survey and the explanation cited below in question #4, Treasury does not consider the separations “due to retirement” a trigger. However, each bureau where a trigger has been identified will be asked to evaluate those voluntary separations due to retirements, transfers and resignations, along with information gleaned from their exit survey, to determine if these triggers are potential barriers.

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

When evaluating total *voluntary* separations of PWD and PWTD, we noted that 53% were due to retirement, 8% were transfers, and 37% were resignations.

When evaluating the total *involuntary* separations, we noted that 4% were due to end of appointment.

Treasury does not consider the separations due to retirement a trigger. However, bureaus will be asked to evaluate those voluntary and involuntary separations due to transfers and resignations, along with the information gleaned from the exit survey, to determine if these triggers are potential barriers.

During the period of October 1, 2018 through September 30, 2019, 195 permanent (85%), seasonal (10%) and temporary (5%) PWD responded to the Department’s Exit Survey. The overall responses from PWD were similar to the overall permanent/seasonal employee responses, in that 33% (64) had more than 25 years of service and 46% (90) were age 60 or older. Of the respondents with disabilities, 33% (65) were disabled veterans. The most frequently cited reason for separation of PWD was retirement (110 or 56%).

The factor most frequently cited as impacting a PWD’s decision to leave was job stress 49% (97) and office morale 33% (66). Additional responses specified that 70% (136) of the respondents indicated their work experience was generally positive; 56% (109) stated nothing could have been done to prevent them from leaving; 63% (123) stated they would be interested in returning to work for Treasury; and 70% (137) stated they would recommend Treasury as a good place to work.



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**B. Accessibility of Technology and Facilities**

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

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

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

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

The following address, located on the Treasury.gov public website, provides information and explains employee and applicant rights under Section 508 of the Rehabilitation Act:

<https://section508.gov/manage/laws-and-policies>.

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

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

Regarding physical accessibility, the following address is located under the "Accessibility" page on the public Treasury.gov website: <https://home.treasury.gov/utility/accessibility/physical-accessibility>.

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

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

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

In FY 2019, OCRD conducted five accessibility reviews: two at the U.S. Mint, at Headquarters in Washington, D.C. and Fort Knox, NY facility and three at IRS Taxpayer Assistance Centers (TAC), in Washington, D.C., Austin and San Antonio, TX. Each location has taken actions to ensure compliance with Sections 501 and 504 of the Rehabilitation Act of 1973 (29 C.F.R 1614 and 31 C.F.R Part 17) to provide access to persons with disabilities, but minor improvements should be made to fully comply

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with the accessibility requirements.

Such as:

In the U.S. Mint headquarters building, the entrance and exit doors push assist buttons were not working, no van accessible parking spaces, the height of the water fountains do not meet the height standard, some grab bars did not have the required clearance space between the wall and the bar, and some bathrooms had exposed sink pipes.

In Fort Knox, there was no accessible route from the provided parking lot to the facility and main building, no accessible exit from the security post into the facility, ramp located at the entrance of the facility was not fully compliant, and water fountains clearance and spout heights do not meet the accessibility requirements.

In the IRS TAC – Landover, MD the entrance to the building, entrance door exceeds the allowed force and does not have a push assist button; access aisles assigned to van accessible parking spaces did not meet the required width; a few of the bathroom grab bars exceeded the maximum height; and some grab bars did not have the required clearance space between the wall and the bar.

In Austin, the signs marking the accessible parking spaces did not meet the required height, interior spaces lack directional signs and signs did not have Braille characters, dispensers in the bathrooms were positioned at a height that exceeded the standards, and some grab bars did not have the required clearance space between the wall and the bar.

In San Antonio, the van accessible parking spaces were not wide enough to meet the standard, the dispensers in the bathrooms were positioned at a height that exceeded the standards, some grab bars did not have the required clearance space between the wall and the bar, the turn-around clearance space in the men's bathroom did not meet the standard and in the women's bathroom, the changing table was obstructing the clearance space.

In FY 2020, OCRD was scheduled to conduct an accessibility review of office spaces at BEP and DO. However, due to COVID-19, OCRD re-adjusted its plan and rescheduled the BEP and DO accessibility reviews for FY 2021.

### **C. Reasonable Accommodation Program**

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

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

Each bureau is responsible for independently processing their requests for reasonable accommodations. The average time frame (number of days) for processing within the bureaus for FY 2019 are:

BEP	09
DO	20
FinCEN	14
FS	04
Mint	08
IRS	76
IRS CC	20
OCC	07

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TIGTA	20
TTB	13

The overall average time for processing the Departments' initial requests for reasonable accommodations is 19 days. The Department recognizes the high average for IRS which is currently reviewing its methodology for calculating "average days for providing reasonable accommodations." Treasury has acquired a Treasury-wide reasonable accommodation tracking system that will eliminate the need to manually calculate processing timeframes and increase the efficiency of processing requests.

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

The Department has an effective Disability Program, supported by various policies, procedures, and practices, as evidenced by overall timely processing requests for accommodations. Mandatory training for new managers and supervisors includes responsibilities on providing reasonable accommodations. Throughout FY 2019, bureaus provided reasonable accommodations guidance via training courses, newsletters, and postings on its intranet websites (see specific bureau submission for details). Bureaus are responsible for monitoring reasonable accommodation data for trends relating to the workforce.

#### **D. Personal Assistance Services Allowing Employees to Participate in the Workplace**

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

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

Treasury established its PAS policy and procedures during FY 2018, however, Treasury did not receive any requests for PAS in FY 2019. A Department-wide BPA was established to provide PAS to all eligible Treasury employees. Information and training is on-going to all managers, supervisors, and selected HR Professionals. PAS training has been added to orientation for all newly-hired managers and newly-promoted managers.

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

#### **A. EEO Complaint data involving Harassment**

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

Yes 0

No X

N/A 0

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- 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       No       N/A

- 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.**

The percentage of Treasury's formal complaints filed by PWDs alleging harassment was 10.94% which is significantly low when compared to the government-wide average of 19.69%. Note: EEOC's Government-wide averages on processing initial requests are available for formal complaints only.

In FY 2019, Treasury did not have any findings of discrimination involving harassment based on disability status; however, there was one complaint involving harassment based on disability status that ended in a settlement.

**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       No       N/A

- 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       No       N/A

- 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.**

The percentage of Treasury's formal complaints filed by PWDs alleging failure to accommodate was 8.54% which is low compared to the government-wide average of 13.53%. Note: EEOC's Government-wide averages on processing initial requests are available for formal complaints only.

Treasury did not have any findings of discrimination involving failure to provide a RA; however, Treasury had two complaints involving failure to provide RA that resulted in settlements.

**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       No

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**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.**

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

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<b>Fiscal Year</b>	<b>Accomplishments</b>			

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

It is important to note that when the Department looks at Treasury-wide data as a whole, the progress noted may not be an accurate reflection of the true progress of each bureau. The consolidated view of the data may mask where potential barriers still exist within some of the bureaus. Therefore, a detailed barrier analysis based on bureau specific data into possible glass ceilings, blocked pipelines and glass walls must be conducted by each of the bureaus. OCRD expressed to the bureaus requirements to complete this analyses and based on their findings, develop plans to eliminate identified barriers.

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

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

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